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*Proposed Counsel for Debtors and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<i>In re</i>	:	<b>Chapter 11</b>
	:	
<b>THE McCLATCHY COMPANY, et al.,</b>	:	<b>Case No. 20-10418 (MEW)</b>
	:	
<b>Debtors.<sup>1</sup></b>	:	<b>(Joint Administration Pending)</b>
	:	
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**AGENDA FOR HEARING ON FIRST DAY  
APPLICATIONS AND MOTIONS**

<sup>1</sup> The last four digits of Debtor The McClatchy Company's tax identification number are 0478. Due to the large number of debtor entities in these chapter 11 cases, for which the Debtors have requested joint administration, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' proposed claims and noticing agent at <http://www.kccllc.net/McClatchy>. The location of the Debtors' service address for purposes of these chapter 11 cases is: 2100 Q Street, Sacramento, California 95816.



Time and Date of Hearing: February 14, 2020 at 11:00 a.m. (Prevailing Eastern Time)

Location of Hearing: Honorable Michael E. Wiles, Courtroom 617, United States Bankruptcy Court, Southern District of New York, One Bowling Green, New York, New York 10004

Copies of Motions and Applications Copies of each pleading identified below can be viewed and/or obtained by: (i) accessing the Court's website at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov), (ii) contacting the Office of the Clerk of the Court at United States Bankruptcy Court, Southern District of New York, or (iii) from the Debtors' proposed notice and claims agent, Kurtzman Carson Consultants LLC, at <http://www.kccllc.net/McClatchy>; (b) contacting Kurtzman Carson Consultants LLC directly at 866-810-6898 (toll free for callers within the United States) and 424-236-7215 (for international callers).

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## **I. INTRODUCTION**

With the Court's permission, the Debtors respectfully request consideration of items 7 and 8 out of order after item 2 in order to ensure a prompt closing of the DIP Financing.

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1. Declaration of Sean M. Harding in Support of Chapter 11 Petitions and First Day Papers [Docket No. 23]

## **II. FIRST DAY APPLICATIONS AND MOTIONS**

### **A. Administrative Matters**

2. Debtors' Motion for Entry of Order (I) Directing Joint Administration of Cases and (II) Waiving Requirements of Bankruptcy Code Section 342(c)(1) and Bankruptcy Rules 1005 and 2002(n) [Docket No. 3]
3. Debtors' Motion for Entry of Order (I) Waiving Certain List Filing Requirements; (II) Authorizing the Filing of a Consolidated List of Top 30 Unsecured Creditors; (III) Authorizing Debtors to Redact Certain Personal Identification Information for Individual Creditors; (IV) Authorizing Debtors to Establish Procedures for Notifying Parties of the Commencement of These Cases; and (V) Waiving the Requirements to File the List of Equity Security Holders and Provide Notice of Commencement to Equity Security Holders [Docket No. 5]
4. Debtors' Motion for Entry of an Order (I) Extending Time for Debtors to File Schedules and Statements; (II) Granting Additional Time to File Reports of Financial Information Required Under Bankruptcy Rule 2015.3; and (II) Authorizing Debtors to File Consolidated Monthly Operating Reports [Docket No. 7]

5. Debtors' Motion for Order Authorizing the Establishment of Certain Notice, Case Management, and Administrative Procedures [Docket No. 8]
6. Debtors' Application for Order Appointing Kurtzman Carson Consultants LLC as Claims and Noticing Agent *Nunc Pro Tunc* to the Petition Date [Docket No. 9]

**B. Business Operations**

7. Debtors' Motion for Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Docket No. 11]
8. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Continued Use of Existing Cash Management System, Bank Accounts, and Business Forms, and Payment of Related Prepetition Obligations, (II) Modifying Certain Deposit Requirements, and (III) Authorizing Continuance of Intercompany Transactions and Honoring Certain Related Prepetition Obligations [Docket No. 14]
9. Debtors' Motion for Entry of Interim and Final Orders Authorizing Debtors to Pay Prepetition Wages, Compensation, and Employee Benefits [Docket No. 15]
10. Debtors' Motion for Entry of Interim and Final Orders Authorizing Debtors to Pay Certain Prepetition Taxes and Related Obligations [Docket No. 16]
11. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Claims of (A) Critical Vendors, and (B) Section 503(b)(9) Claimants, and (II) Granting Related Relief [Docket No. 17]
12. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Honor Certain Prepetition Obligations to Customers and Continue Customer Programs in the Ordinary Course of Business, and (II) Granting Related Relief [Docket No. 18]
13. Debtors' Motion for Entry of Interim and Final Orders Establishing Notice and Hearing Procedures for Trading In, or Claims of Worthlessness With Respect to, Equity Securities in the Debtors [Docket No. 19]

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Dated: New York, New York  
February 13, 2020

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

/s/Van C. Durrer, II

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