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*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>(Jointly Administered)</b>
	:	
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**NOTICE OF AGENDA OF MATTERS SCHEDULED  
FOR TELEPHONIC HEARING ON AUGUST 4, 2020  
AT 3:00 P.M. (EASTERN TIME)**

<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 jointly administered chapter 11 cases, 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’ 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.



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**\*\*AT THE REQUEST OF THE COURT THIS HEARING  
WILL BE TELEPHONIC ONLY\*\***

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Hearing Attendance Instructions:	Parties wishing to participate in the Telephonic Hearing must make arrangements through Court Solutions at their website: <a href="https://www.court-solutions.com">https://www.court-solutions.com</a> .
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 <a href="http://www.nysb.uscourts.gov">www.nysb.uscourts.gov</a> , (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' notice and claims agent, Kurtzman Carson Consultants LLC, at <a href="http://www.kccllc.net/McClatchy">http://www.kccllc.net/McClatchy</a> ; (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. ADJOURNED MATTER**

1. Motion of Official Committee of Unsecured Creditors for (I) Leave, Standing and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of Debtors Estates and (II) Exclusive Settlement Authority [Docket No. 546]

Objection Deadline: June 26, 2020 at 4:00 p.m.

Related Documents: *Ex Parte* Motion to File Under Seal Certain Portions of the Motion of Official Committee of Unsecured Creditors for (I) Leave, Standing and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of Debtors Estates and (II) Exclusive Settlement Authority [Docket No. 547]

*Ex Parte* Motion to Shorten Notice of the Motion of Official Committee of Unsecured Creditors for (I) Leave, Standing and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of Debtors Estates and (II) Exclusive Settlement Authority [Docket No. 548]

Order Authorizing *Ex Parte* Motion to Shorten Notice of the Motion of Official Committee of Unsecured Creditors For Leave, Standing and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of

Debtors' Estates and Exclusive Settlement  
Authority [Docket No. 549]

Notice of Motion of the Official Committee of  
Unsecured Creditors for (I) Leave, Standing and  
Authority to Commence and Prosecute Certain  
Claims and Causes of Action on Behalf of the  
Debtors Estates and (II) Exclusive Settlement  
Authority [Docket No. 551]

Responses Filed:

Objection of Brigade Capital Management, LP to  
the Motion of the Official Committee of  
Unsecured Creditors for (I) Leave, Standing and  
Authority to Commence and Prosecute Certain  
Claims and Causes of Action on Behalf of  
Debtors Estates and (II) Exclusive Settlement  
Authority [Docket No. 564]

*Ex Parte* Motion to File Under Seal Certain  
Portions of the Objection of Chatham Asset  
Management, LLC to Motion of Official  
Committee of Unsecured Creditors for (I) Leave,  
Standing and Authority to Commence and  
Prosecute Certain Claims and Causes of Action  
on Behalf of Debtors Estates and (II) Exclusive  
Settlement Authority [Docket No. 565]

Debtors' Objection To Motion Of Official  
Committee of Unsecured Creditors For (I) Leave,  
Standing and Authority to Commence and  
Prosecute Certain Claims and Causes of Action  
on Behalf of Debtors' Estates and (II) Exclusive  
Settlement Authority [Docket No. 566]

Objection of Chatham Asset Management, LLC  
to Motion of Official Committee of Unsecured  
Creditors For (I) Leave, Standing and Authority  
To Commence and Prosecute Certain Claims and  
Causes of Action on Behalf of Debtors' Estates  
and (II) Exclusive Settlement Authority [Docket  
No. 567]

Declaration of James C. Tecce in Support of  
Objection of Chatham Asset Management, LLC  
to Motion of Official Committee of Unsecured  
Creditors For (I) Leave, Standing and Authority to  
Commence and Prosecute Certain Claims and  
Causes of Action on Behalf Of Debtors' Estates

and (II) Exclusive Settlement Authority [Docket No. 568]

Debtors' Motion For Leave To File Under Seal Certain Portions Of: Debtors' Objection To Motion Of Official Committee Of Unsecured Creditors For (I) Leave, Standing And Authority To Commence And Prosecute Certain Claims And Causes Of Action On Behalf Of Debtors' Estates And (II) Exclusive Settlement Authority [Docket No. 569]

Objection of The Bank of New York Mellon Trust Company, N.A. to the Motion of the Official Committee of Unsecured Creditors for (I) Leave, Standing and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of Debtors' Estates and (II) Exclusive Settlement Authority [Docket No. 571]

Declaration of Sean M. Harding in Support of the Debtors' Objection to Motion of Official Committee of Unsecured Creditors for (I) Leave, Standing and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of Debtors Estates and (II) Exclusive Settlement Authority [Docket No. 573]

Debtors' Motion for Leave to File Under Seal Certain Portions of the Declaration of Sean M. Harding in Support of the Debtors' Objection to Motion of Official Committee of Unsecured Creditors for (I) Leave, Standing and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of Debtors Estates and (II) Exclusive Settlement Authority [Docket No. 574]

Order Authorizing *Ex Parte* Motion To File Under Seal Certain Portions Of The Objection Of Chatham Asset Management, LLC To Motion Of Official Committee Of Unsecured Creditors For Leave, Standing And Authority To Commence And Prosecute Certain Claims And Causes Of Action On Behalf Of Debtors' Estates And Exclusive Settlement Authority [Docket No. 579]

Order Granting Debtors' Motion For Leave To File Under Seal Certain Portions Of The

Declaration Of Sean M. Harding In Support Of Debtors' Objection To Motion Of Official Committee Of Unsecured Creditors For Leave, Standing, And Authority To Commence And Prosecute Certain Claims And Causes Of Action On Behalf Of Debtors' Estates And Exclusive Settlement Authority [Docket No. 580]

Order Granting Debtors' Motion For Leave To File Under Seal Certain Portions Of Debtors' Objection To Motion Of Official Committee Of Unsecured Creditors For Leave, Standing And Authority To Commence And Prosecute Certain Claims And Causes Of Action On Behalf Of Debtors' Estates And Exclusive Settlement Authority [Docket No. 581]

Letter from Van C. Durrer, II to the Honorable Michael E. Wiles regarding Intercompany Claims and Solvency [Docket No. 627]

Reply:

Omnibus Reply In Further Support Of Motion Of Official Committee Of Unsecured Creditors For (I) Leave, Standing And Authority To Commence And Prosecute Certain Claims And Causes Of Action On Behalf Of Debtors Estates And (II) Exclusive Settlement Authority [Docket No. 585]

Status:

**The hearing on this matter has been adjourned on consent of all parties to August 26, 2020 at 11:00 a.m.**

## II. UNCONTESTED MATTER

2. Debtors' Motion for Order Authorizing Abandonment of Equity Interests in Quad County Publishing, Inc. [Docket No. 589]

Objection Deadline: July 6, 2020 at 9:00 a.m.

Status: **The hearing on this matter is going forward.**

## III. CONTESTED MATTER

3. Debtors' Motion for Orders: (A)(I) Establishing Bidding Procedures Relating to the Sale of Substantially All of the Debtors' Assets; (II) Establishing Procedures for the Debtors to Enter Into Stalking Horse Agreement With Bid Protections in Connection With a Sale of Substantially All of the Debtors Assets; (III) Approving Procedures for the Assumption and Assignment of Certain

Executory Contracts and Unexpired Leases, (IV) Approving Form and Manner of Notice of All Procedures, Protections, Schedules and Agreements, and (V) Scheduling a Hearing to Consider the Proposed Sale, and (B)(I) Approving the Sale of the Debtors Assets Free and Clear of All Liens, Claims, Encumbrances and Interests; (II) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (III) Granting Certain Related Relief [Docket No. 418]

Objection Deadline: July 29, 2020 at 4:00 p.m.

Related Documents: Order (I) Establishing Bidding Procedures Relating to the Sale of Substantially All of the Debtors' Assets; (II) Establishing Procedures for the Debtors to Enter into Stalking Horse Agreement with Bid Protections in Connection with a Sale of Substantially All of the Debtors' Assets; (III) Approving Procedures for the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; (IV) Approving Form and Manner of Notice of All Procedures, Protections, Schedules and Agreements; (V) Scheduling a Hearing to Consider the Proposed Sale and (VI) Granting Certain Related Relief [Docket No. 432]

Notice of Proposed Assumption and Assignment of Certain Executory Contracts [Docket No. 511]

First Supplemental Notice Of Proposed Assumption And Assignment Of Certain Executory Contracts [Docket No. 561]

Supplemental Notice of Auction [Docket No. 657]

Notice of Successful Bid Asset Purchase Agreement [Docket No. 693]

Declaration of Jonathan Knee in Support of Entry of the Sale Order [Docket No. 694]

Declaration of Sean M. Harding in Support of Entry of the Sale Order [Docket No. 695]

Notice of Backup Bid [Docket No. 696]

Second Supplemental Notice Of Proposed Assumption And Assignment Of Certain Executory Contracts [Docket No. 714]

Notice of Filing of (A) Revised Order (I) Approving the Sale of the Acquired Assets Free and Clear of Claims, Liens, Interests and Encumbrances; (II) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (III) Granting Related Relief and (B) Stipulation Regarding Mediated Sale and Plan Settlement [Docket No. 728]

Notice of Filing of Revised Asset Purchase Agreement [Docket No. 731]

Responses Filed:

Microsoft Corporation's Objection to Cure Amount [Docket No. 557]

Objection of Cigna to Notice of Proposed Assumption and Assignment of Certain Executory Contracts [Docket No. 558]

Amended Objection of Cigna to Notice of Proposed Assumption and Assignment of Certain Executory Contracts [Docket No. 562]

Oracle's Limited Objection And Reservation Of Rights Regarding Debtors' Motion For Order (A) Approving The Sale Of The Debtors' Assets Free And Clear Of All Liens, Claims, Encumbrances And Interests; (II) Authorizing The Assumption And Assignment Of Certain Executory Contracts And Unexpired Leases; And (III) Granting Certain Related Relief; And (B) Notice Of Proposed Assumption And Assignment Of Certain Executory Contracts [Docket No. 563]

Limited Objection and Reservation of Rights of OWS CF V SPV, LLC, as Assignee of OWS BCA Funding, LLC, to Notice of Proposed Assumption and Assignment of Certain Executory Contracts [Docket No. 570]

Limited Objection Of The Chubb Companies To Debtors Motion For Orders: (A)(I) Establishing

Bidding Procedures Relating To The Sale Of Substantially All Of The Debtors Assets; (II) Establishing Procedures For The Debtors To Enter Into Stalking Horse Agreement With Bid Protections In Connection With A Sale Of Substantially All Of The Debtors Assets; (III) Approving Procedures For The Assumption And Assignment Of Certain Executory Contracts And Unexpired Leases, (IV) Approving Form And Manner Of Notice Of All Procedures, Protections, Schedules And Agreements, And (V) Scheduling A Hearing To Consider The Proposed Sale, And (B)(I) Approving The Sale Of The Debtors Assets Free And Clear Of All Liens, Claims, Encumbrances And Interests (II) Authorizing The Assumption And Assignment Of Certain Executory Contracts And Unexpired Leases; And (III) Granting Certain Related Relief [Docket No. 706]

Local Texas Tax Authorities' Objection to Debtors' Motion for Orders: (A)(I) Establishing Bid-ding Procedures . . . and (B)(I) Approving the Sale of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances and Interests . . . and (III)Granting Certain Related Relief [Docket No. 710]

**Status: The hearing on this matter is going forward.**

*[Remainder of Page Intentionally Left Blank]*



Dated: New York, New York  
August 3, 2020

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

/s/ Van C. Durrer, II

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