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*Counsel for GUC Recovery Trustee*

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

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In re:	:	Chapter 11
	:	
JCK LEGACY COMPANY, <i>et al.</i> ,	:	Case No. 20-10418 (MEW)
	:	
Debtors. <sup>1</sup>	:	(Jointly Administered)
	:	
-----	x	<b>Related Docket No. 1162</b>

**AMENDED NOTICE OF MOTION**

**THE HEARING TIME ORIGINALLY NOTICED FOR 10:00 A.M. (ET) HAS BEEN CORRECTED TO 11:00 A.M. (ET), AND THE JOINT MOTION SHALL BE HELD TELEPHONICALLY VIA COURT SOLUTIONS LLC.**

**PLEASE TAKE NOTICE** that on April 7, 2021, William A. Brandt, Jr., in his capacity as trustee (the “**GUC Recovery Trustee**”) for the GUC Recovery Trust established under the Trust Agreement and the Plan, and prospective class representatives Lorianne Sawin, Monica Gallardo, Robert Langford, Kimberly Holliman, Billy Trahim, and Merle Renslow (“**Class Representatives**”), on their own behalf and similarly situated prospective class members (and together with the GUC Recovery Trustee, the “**Parties**”), filed the *Joint Motion Seeking to (I) Approve the Settlement Agreement, (II) Certify a Class of Former Newspaper Carriers for Settlement Purposes Only, (III) Appoint Class Counsel and Class Representatives, (IV) Preliminarily Approve the Settlement Agreement, (V) Approve the Form and Manner of Notice to Class Members of the Class Certification and the Settlement Agreement, (VI) Schedule a Fairness Hearing to Consider Final Approval of the Settlement Agreement, (VII) Finally Approve the*

<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.kcccllc.net/McClatchy>. The location of the Debtors’ service address for purposes of these chapter 11 cases is: 2100 Q Street, Sacramento, California 95816.



*Settlement Agreement After Fairness Hearing, and (VIII) Grant Related Relief (the “Joint Motion”)* [Docket No. 1162].

**PLEASE TAKE FURTHER NOTICE** that any objections to the Joint Motion must be filed on or before **April 21, 2021 at 4:00 p.m. (ET)** (the “**Objection Deadline**”) with the United States Bankruptcy Court for the Southern District of New York, Courtroom 617, One Bowling Green, New York, New York 10004. At the same time, you must serve a copy of any objection by the Objection Deadline upon the undersigned counsel to the respective Parties and to:

- (a) The Debtors, JCK Legacy Company, c/o FTI Consulting, Inc., 1201 W. Peachtree Street, NW, Suite 500, Atlanta, Georgia 30309, Attn.: Sean M. Harding ([sean.harding@fticonsulting.com](mailto:sean.harding@fticonsulting.com));
- (b) Counsel for the Plan Administration Trustee, Skadden, Arps, Slate, Meagher & Flom LLP, One Manhattan West, New York, New York 10001, Attn.: Shana A. Elberg ([shana.elberg@skadden.com](mailto:shana.elberg@skadden.com)) and Bram A. Strohlic ([bram.strohlic@skadden.com](mailto:bram.strohlic@skadden.com)), 300 South Grand Avenue, Suite 3400, Los Angeles, California 90071, Attn.: Van C. Durrer, II ([van.durrer@skadden.com](mailto:van.durrer@skadden.com)), and Destiny N. Almogue ([destiny.almogue@skadden.com](mailto:destiny.almogue@skadden.com)) and 525 University Avenue, Palo Alto, California 94301 Attn.: Jennifer Madden ([jennifer.madden@skadden.com](mailto:jennifer.madden@skadden.com));
- (c) Co-counsel for the Plan Administration Trustee, Togut, Segal & Segal LLP, One Penn Plaza, Suite 3335, New York, New York 10119, Attn.: Albert Togut ([altogut@teamtogut.com](mailto:altogut@teamtogut.com)) and Kyle J. Ortiz ([kortiz@teamtogut.com](mailto:kortiz@teamtogut.com));
- (d) The Office of the United States Trustee, U.S. Federal Office Building, 201 Varick Street, Room 1006, New York, New York 10014, Attn.: Benjamin J. Higgins and Brian S. Masumoto; and
- (e) Any party that has requested notice pursuant to Bankruptcy Rule 2002;

**PLEASE TAKE FURTHER NOTICE THAT, UNLESS THE TELEPHONIC HEARING PROCEDURES SET FORTH IN GENERAL ORDER M-543 (Morris, C.J.) IS AMENDED, HEARING TO CONSIDER THE MOTION SHALL BE HELD TELEPHONICALLY VIA COURT SOLUTIONS LLC ON APRIL 28, 2021 AT 11:00 A.M. (ET) BEFORE THE HONORABLE MICHAEL E. WILES IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF NEW YORK, ONE BOWLING GREEN, COURTROOM 617, NEW YORK, NEW YORK 10004. INSTRUCTIONS TO REGISTER FOR COURT SOLUTIONS LLC ARE ATTACHED TO GEN. ORD. M-543.**

**PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND  
IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF  
REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR A HEARING.**

New York, New York  
Dated: April 8, 2021

Respectfully submitted,

PILLSBURY WINTHROP SHAW PITTMAN LLP

/s/ Leo T. Crowley-----  
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*Counsel for GUC Recovery Trustee*

Dated: April 8, 2021

CALLAHAN & BLAINE

/s/ Michael J. Sachs-----  
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*Proposed Class Counsel*