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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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| ----- | X | |
| <i>In re</i> | : | Chapter 11 |
| | : | |
| THE McCLATCHY COMPANY, <i>et al.</i> , | : | Case No. 20-10418 (MEW) |
| | : | |
| Debtors. ¹ | : | (Jointly Administered) |
| | : | |
| ----- | X | |

**NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR TELEPHONIC HEARING ON MARCH 25, 2020
AT 11:00 A.M. (EASTERN TIME)**

¹ 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' 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.



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

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|------------------------------------|---|
| Courtcall Information: | Parties wishing to participate in the Telephonic Hearing must make arrangements through CourtCall by telephone at 1-888-882-6878. |
| 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 , (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). |

I. STATUS REPORT

II. UNCONTESTED MATTERS

1. 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]

Objection Deadline: March 2, 2020 at 4:00 p.m.; Objection Deadline Extended to March 18, 2020 at 4:00 p.m. for the Creditors' Committee and the Office of the United States Trustee only.

Related Documents: Interim Order (I) Authorizing Continued Use of Existing Cash Management System, Bank Accounts, and Business Forms and Payment of Related Prepetition Obligations; (II) Modifying Certain Deposit Requirement and (III) Authorizing Continuance of Intercompany Transactions and Honoring Certain Related Prepetition Obligations [Docket No. 66]

Certificate of No Objection With Respect to Order (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. 208]

Responses Filed: None.

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

2. 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]

Objection Deadline: March 2, 2020 at 4:00 p.m.; Objection Deadline Extended to March 18, 2020 at 4:00 p.m. for the Creditors' Committee and the Office of the United States Trustee only.

Related Documents: Interim Order Establishing Notice and Hearing Procedures for Trading in, or Treating as Becoming Worthless, Equity Securities in the Debtors [Docket No. 78]

Certificate of No Objection With Respect to Final Order Establishing Notice and Hearing Procedures for Trading In, or Treating as Becoming Worthless, Equity Securities in the Debtors [Docket No. 215]

Responses Filed: None.

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

3. Debtors' Motion for Entry of Interim and Final Orders Authorizing Debtors to Pay Prepetition Wages, Compensation, and Employee Benefits [Docket No. 15]

Objection Deadline: March 2, 2020 at 4:00 p.m.

Related Documents: Interim Order Authorizing Debtors to Pay Certain Prepetition Wages, Compensation, and Employee Benefits [Docket No. 65]

Notice of Filing of Revised Proposed Order Authorizing Debtors to Pay Prepetition Wages, Compensation, and Employee Benefits [Docket No. 145]

Declaration of Sean M. Harding in Support of Debtors' Motion for Entry of an Order

Approving Continuation of and Payment of
Prepetition Obligations Under the 2019
Retention Plans [Docket No. 172]

Final Order Authorizing Debtors to Pay
Prepetition Wages, Compensation, and
Employee Benefits [Docket No. 184]

Notice of Filing of Order Authorizing Debtors
to Maintain and Pay Prepetition Obligations
Under the 2019 Retention Plans [Docket No.
216]

Responses Filed:

Response of P. Anthony Ridder, George Riggs,
and the Former Knight Ridder and McClatchy
Salaried Employees Association to the Debtors'
Motion for Entry of Interim and Final Orders
Authorizing Debtors to Pay Prepetition Wages,
Compensation, and Employee Benefits [Docket
No. 134]

Reply:

Debtors' Reply to Response of P. Anthony
Ridder, George Riggs, and the Former Knight
Ridder and McClatchy Salaried Employees
Association to the Debtors' Motion for Entry of
Interim and Final Orders Authorizing Debtors to
Pay Prepetition Wages, Compensation, and
Employee Benefits [Docket No. 144]

Status:

**The hearing on this matter is going forward
only with regards to the 2019 Non-Executive
Retention Plan.**

4. Debtors' Application for an Order Authorizing Employment and Retention of Kurtzman Carson Consultants LLC as Administrative Advisor to the Debtors *Nunc Pro Tunc* to the Petition Date [Docket No. 95]

Objection Deadline:

March 2, 2020 at 4:00 p.m.; Objection Deadline
Extended to March 18, 2020 at 4:00 p.m. for the
Creditors' Committee and the Office of the United
States Trustee only.

Related Documents:

Notice of Hearing on Debtors' Application for
an Order Authorizing Employment and
Retention of Kurtzman Carson Consultants LLC
as Administrative Advisor to the Debtors *Nunc
Pro Tunc* to the Petition Date [Docket No. 96]

Notice of Adjournment of Hearing [Docket No. 128]

Supplemental Declaration of Evan Gershbein in Support of Debtors' Application for an Order Authorizing Employment and Retention of Kurtzman Carson Consultants LLC as Administrative Advisor to the Debtors *Nunc Pro Tunc* to the Petition Date [Docket No. 195]

Certificate of No Objection to Debtors' Application for an Order Authorizing Employment and Retention of Kurtzman Carson Consultants LLC as Administrative Advisor to the Debtors *Nunc Pro Tunc* to the Petition Date, together with Exhibits A and B [Docket No. 213]

Responses Filed: None.

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

5. Debtors' Application for an Order Authorizing Employment and Retention of Groom Law Group, Chartered as Special Employee Benefits Counsel to the Debtors *Nunc Pro Tunc* to the Petition Date [Docket No. 99]

Objection Deadline: March 2, 2020 at 4:00 p.m.; Objection Deadline Extended to March 18, 2020 at 4:00 p.m. for the Creditors' Committee and the Office of the United States Trustee only.

Related Documents: Notice of Hearing [Docket No. 103]

Notice of Adjournment of Hearing [Docket No. 128]

Certificate of No Objection With Respect to Order Authorizing Employment and Retention of Groom Law Group, Chartered as Special Employee Benefits Counsel to the Debtors *Nunc Pro Tunc* to the Petition Date [Docket No. 209]

Responses Filed: None.

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

6. Debtors' Application for Order (I) Authorizing the Employment and Retention of Evercore Group L.L.C. as Investment Banker and Financial Advisor to the Debtors Effective *Nunc Pro Tunc* to the Petition Date, (II) Approving the Terms

of the Evercore Agreement, (III) Waiving Certain Time Keeping Requirements, and (IV) Granting Related Relief [Docket No. 100]

Objection Deadline: March 2, 2020 at 4:00 p.m.; Objection Deadline Extended to March 18, 2020 at 4:00 p.m. for the Creditors' Committee and the Office of the United States Trustee only.

Related Documents: Notice of Hearing [Docket No. 103]

Notice of Adjournment of Hearing [Docket No. 128]

Responses Filed: None.

Status: The Debtors are addressing informal comments from the Creditors' Committee which will be incorporated in the proposed order. The hearing on this matter is going forward.

7. Debtors' Motion for Entry of an Order Authorizing Rejection of Unexpired Lease of Nonresidential Real Property Located at 401 I Street, Suite 200, Sacramento, California 95814 [Docket No. 111]

Objection Deadline: March 18, 2020 at 4:00 p.m.

Related Documents: Certificate of No Objection to Debtors' Motion for Entry of an Order Authorizing Rejection of Unexpired Lease of Nonresidential Real Property Located at 401 I Street, Suite 200, Sacramento, California 95814, together with Exhibits A and B [Docket No. 217]

Responses Filed: None.

Status: The hearing on this matter is going forward.

8. Debtors' Second Omnibus Motion for Entry of an Order Authorizing and Approving the Rejection of Certain Leases and Related Agreements [Docket No. 182]

Objection Deadline: March 18, 2020 at 4:00 p.m.

Related Documents: Certificate of No Objection to Debtors' Second Omnibus Motion for Entry of an Order Authorizing and Approving the Rejection of Certain Leases and Related Agreements, together with Exhibits A and B [Docket No. 214]

Responses Filed: None.

Status: **The hearing on this matter is going forward except with respect to RYLB FW Properties LP.**

9. Debtors' Application for an Order (I) Authorizing the Employment and Retention of FTI Consulting, Inc. Effective *Nunc Pro Tunc* to the Petition Date, (II) Approving the Terms of FTI's Employment and Retention, (III) Designating Sean M. Harding as Chief Restructuring Officer, and (IV) Granting Related Relief [Docket No. 116]

Objection Deadline: March 18, 2020 at 4:00 p.m.

Related Documents: Certificate of No Objection to Debtors' Application for an Order (I) Authorizing the Employment and Retention of FTI Consulting, Inc. Effective *Nunc Pro Tunc* to the Petition Date, (II) Approving the Terms of FTI's Employment and Retention, (III) Designating Sean M. Harding as Chief Restructuring Officer, and (IV) Granting Related Relief, together with Exhibits A and B [Docket No. 212]

Responses Filed: None.

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

III. CONTESTED MATTERS

10. 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]

Objection Deadline: March 2, 2020 at 4:00 p.m.; Objection Deadline Extended to March 18, 2020 at 4:00 p.m. for all parties

Related Documents: Declaration of Bo S. Yi in Support of the 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. 12]

Declaration of Sean M. Harding in Support of the 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. 13]

Interim Order (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Use Cash Collateral, (II) Granting (A) Liens and Providing Superpriority Administrative Expense Status and (B) Adequate Protection to Certain Prepetition Lenders, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [Docket No. 64]

Notice of Filing of Redacted Portions of the Payoff Letter Related to Proposed Postpetition Financing Facilities [Docket No. 86]

Responses Filed:

Pension Benefit Guaranty Corporation's Limited Objection to 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. 58]

Limited Objection of the United States Trustee to the Debtors' Motion for Entry of 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. 199]

Replies:

Debtors' Reply in Support of Debtors' Motion for Entry of 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. 210]

Status:

The hearing on this matter is going forward.

11. Debtors' Application for Order Authorizing Employment and Retention of Skadden, Arps, Slate, Meagher & Flom LLP as Counsel to the Debtors *Nunc Pro Tunc* to the Petition Date [Docket No. 117]

Objection Deadline:

March 18, 2020 at 4:00 p.m.

Related Documents:

Supplemental Declaration of Van C. Durrer II in Support of Debtors' Application for Order Authorizing Employment and Retention of Skadden, Arps, Slate, Meagher & Flom LLP as Counsel to the Debtors *Nunc Pro Tunc* to the Petition Date [Docket No. 203]

Responses Filed:

Objection of the United States Trustee to Debtors' Application for Order Authorizing Employment and Retention of Skadden, Arps, Slate, Meagher & Flom LLP as Counsel to the Debtors *Nunc Pro Tunc* to the Petition Date [Docket No. 202]

Replies:

Debtors' Reply to Objection of the United States Trustee to Debtors' Application for Order Authorizing Employment and Retention of Skadden, Arps, Slate, Meagher & Flom LLP as Counsel to the Debtors *Nunc Pro Tunc* to the Petition Date [Docket No. 206]

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

12. Debtors' Application for Order Pursuant to Bankruptcy Code Sections 327(a) and 328 Authorizing the Employment and Retention of Togut, Segal & Segal LLP as Co-Counsel to the Debtors and Debtors in Possession, *Nunc Pro Tunc* to the Petition Date [Docket No. 101]

Objection Deadline: March 2, 2020 at 4:00 p.m.; Objection Deadline Extended to March 18, 2020 at 4:00 p.m. for the Creditors' Committee and the Office of the United States Trustee only.

Related Documents: Notice of Adjournment of Hearing [Docket No. 128]

Responses Filed: Limited Objection of the United States Trustee to Debtors' Application for Order Pursuant to Bankruptcy Code Sections 327(a) and 328 Authorizing the Employment and Retention of Togut, Segal & Segal LLP as Co-Counsel to the Debtors and Debtors in Possession, *Nunc Pro Tunc* to the Petition Date [Docket No. 201]

Replies: Debtors' Reply to the Limited Objection of the United States Trustee to the Debtors' Application for Order Pursuant to Bankruptcy Code Sections 327(a) and 328 Authorizing the Employment and Retention of Togut, Segal & Segal LLP as Co-Counsel to the Debtors and Debtors in Possession, *Nunc Pro Tunc* to the Petition Date [Docket No. 207]

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

13. *Ex Parte* Application of the Former Knight Ridder and McClatchy Salaried Employees Association for Entry of an Order Pursuant to Federal Rules of Bankruptcy Procedure 2004 and 9016 Authorizing the Debtors' Production of Documents [Docket No. 171]

Objection Deadline: N/A

Related Documents: Notice of Presentment of *Ex Parte* Application of the Former Knight Ridder and McClatchy Salaried Employees Association for Entry of an Order Pursuant to Federal Rules of Bankruptcy Procedure 2004 and 9016 [Docket No. 191]

Responses Filed: Debtors' Objection to *Ex Parte* Application of the Former Knight Ridder and McClatchy

Salaried Employees Association for Entry of an Order Pursuant to Federal Rules of Bankruptcy Procedure 2004 and 9016 Authorizing the Debtors' Production of Documents [Docket No. 181]

Replies:

Reply to Debtors' Objection to *Ex Parte* Application of Former Knight Ridder and McClatchy Salaried Employees Association for Entry of an Order Pursuant to Federal Rules of Bankruptcy Procedure 2004 and 9016 Authorizing the Debtors' Production of Documents [Docket No. 196]

Status:

The hearing on this matter is going forward.

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Dated: New York, New York
March 24, 2020

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

/s/ Van C. Durrer, II

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