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

In re:

Vewd Software USA, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 21-12065 (MEW)

(Joint Administration Requested)

**NOTICE OF COMMENCEMENT
OF CHAPTER 11 CASES AND HEARING ON FIRST DAY MOTIONS**

PLEASE TAKE NOTICE that on December 15, 2021 (the “Petition Date”), Vewd Software USA, LLC and certain of its affiliates, as debtors and debtors in possession (each a “Debtor” and collectively, the “Debtors”), each filed a voluntary petition for relief under

¹ The Debtors in these chapter 11 cases, for which joint administration has been requested, along with the last four digits of their tax identification numbers, are as follows: Vewd Software USA, LLC (9013); Vewd Software AS (8011); and Last Lion Holdco AS (4926).



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chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of New York (the “Court”).

PLEASE TAKE FURTHER NOTICE that on the Petition Date, in addition to their chapter 11 petitions, the Debtors have filed the following first day motions and related pleadings (collectively, the “First Day Pleadings”):

I. Motions and Applications to be Heard at the First Day Hearing.

1. ***Joint Administration Motion.*** Debtors’ Motion for Entry of an Order (A) Directing Joint Administration of Related Chapter 11 Cases and (B) Granting Related Relief [Docket No. 2].
2. ***Noticing Agent 156(c) Application.*** Debtors’ Application for Entry of an Order Appointing Kurtzman Carson Consultants LLC as Claims and Noticing Agent for the Debtors [Docket No. 3].
3. ***Cash Management Motion.*** Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue Intercompany Transactions, (II) Waiving Compliance with Restrictions Imposed by Section 345 of the Bankruptcy Code, and (III) Granting Related Relief [Docket No. 7].
4. ***Insurance Motion.*** Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue Insurance Coverage Entered into Prepetition and Satisfy Prepetition Obligations Related Thereto and (B) Renew, Amend, Supplement, Extend, or Purchase Insurance Policies and (II) Granting Related Relief [Docket No. 8].
5. ***Wages Motion.*** Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, Benefit Obligations, and Reimbursable Expenses and (B) Continue Employee Compensation and Benefits Programs and (II) Granting Related Relief [Docket No. 6].
6. ***DIP Motion.*** Debtors’ Motion for Entry of Interim and Final Orders (A) Authorizing the Debtors to (I) Obtain Postpetition Financing, (II) Use Cash Collateral, (III) Grant Senior Secured Liens and Provide Claims with Superpriority Administrative Expense Status and (IV) Grant Adequate Protection to the Prepetition Secured Parties, (B) Modifying the Automatic Stay, (C) Scheduling a Final Hearing, and (D) Granting Related Relief [Docket No. 14].

7. ***Non-U.S. Vendors Motion.*** Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing the Debtors to Pay Certain Prepetition Claims of Non-U.S. Vendors and Service Providers; (B) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests; and (C) Granting Related Relief [Docket No. 11].
8. ***Stay Enforcement Motion.*** Debtors' Motion for Entry of an Order Enforcing and Restating Automatic Stay and Non-Discrimination Provisions of the Bankruptcy Code [Docket No. 12].
9. ***Creditor Matrix Motion.*** Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to File a Consolidated List of Creditors in Lieu of Submitting a Separate Mailing Matrix for Each Debtor, (II) Approving the Form and Manner of Notifying Creditors of Commencement of the Bankruptcy Cases, and (III) Granting Related Relief [Docket No. 9].
10. ***Motion to Seal Creditor Matrix.*** Debtors' Motion Pursuant to 11 U.S.C. §§ 107(c) and 105(a) for an Order Authorizing the Debtors to Redact and File under Seal Certain Personally Identifiable Information on the Creditor Matrix and Schedules and Statements [Docket No. 10].
11. ***Schedules Extension Motion.*** Debtors' Motion for Entry of an Order (I) Extending Deadline for Debtors to File Their Schedules of Assets and Liabilities, Schedules of Current Income and Expenditures, Schedules of Executory Contracts and Unexpired Leases and Statements of Financial Affairs and (II) Granting Related Relief [Docket No. 13].
12. ***Scheduling Motion.*** Debtors' Motion for Entry of an Order (I) Scheduling a Combined Disclosure Statement Approval and Plan Confirmation Hearing, (II) Establishing Plan and Disclosure Statement Objection and Reply Deadlines and Related Procedures, (III) Approving the Solicitation Procedures, (IV) Approving the Combined Hearing Notice, and (V) Granting Related Relief [Docket No. 17].

II. Related Pleadings

1. ***First Day Declaration.*** Declaration of Aneesh Rajaram, Chief Executive Officer of Vewd Software AS, in Support of Chapter 11 Petitions and First Day Motions [Docket No. 18].
2. ***First Day Declaration.*** Declaration of Richard W. Morgner, Proposed Investment Banker of the Debtors, in Support of Chapter 11 Petitions and Debtors' Motion to Obtain Postpetition Debtor-In-Possession Financing [Docket No. 19].
3. ***Plan.*** Joint Prepackaged Chapter 11 Plan of Reorganization of Vewd Software USA, LLC, and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 15].

4. ***Disclosure Statement.*** Disclosure Statement for the Joint Prepackaged Chapter 11 Plan of Reorganization of Vewd Software USA, LLC, and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 16].

PLEASE TAKE FURTHER NOTICE that a hearing to consider these motions (the “First Day Hearing”) has been scheduled by the Court for **December 17, 2021, at 12:00 p.m. (prevailing Eastern Time)**, with such hearing to be held before the Honorable Michael E. Wiles, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004 in accordance with the Court’s schedule. In accordance with General Order M-543 (“General Order M-543”), dated March 20, 2020, the First Day Hearing will only be conducted telephonically. Any parties wishing to participate in the First Day Hearing must make arrangements through CourtSolutions LLC. Instructions to register for CourtSolutions LLC are attached to General Order M-54.

PLEASE TAKE FURTHER NOTICE that copies of the First Day Pleadings and other pleadings for subsequent hearings may be obtained free of charge by visiting the website of Kurtzman Carson Consultants LLC at <http://www.kccllc.net/vewd>. You may also obtain copies of any pleadings by visiting the Court’s website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

PLEASE TAKE FURTHER NOTICE that your rights may be affected. The Debtors have requested that the Court consider the relief requested in the First Day Pleadings on a final basis, in certain cases, or on an interim basis pending a final hearing to be scheduled at a later date. You should read the First Day Pleadings carefully and discuss them with your attorney, if you have one in connection with the chapter 11 cases (if you do not have an attorney, you may wish to consult with one).

PLEASE TAKE FURTHER NOTICE that if you do not want the Court to grant the relief requested in the First Day Pleadings, or if you want the Court to consider your views on the First Day Pleadings, then you, or your attorney, must attend the First Day Hearing. If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the First Day Pleadings and may enter orders granting the relief requested in the First Day Pleadings.

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Dated: December 16, 2021
New York, New York

ROPES & GRAY LLP

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