ROPES & GRAY LLP Gregg M. Galardi Lucas W. Brown Katharine E. Scott 1211 Avenue of the Americas New York, New York 10036 Telephone: (212) 596-9000 Facsimile: (212) 596-9090

- and -

ROPES & GRAY LLP Stephen Iacovo (admitted pro hac vice) 191 North Wacker Drive Chicago, Illinois 60606 Telephone: (312) 845-1200 Facsimile: (312) 596-5500

Proposed Counsel to Debtors and Debtors in Possession

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)

(Jointly Administered)

NOTICE OF AMENDED AGENDA OF MATTERS SCHEDULED FOR FIRST DAY HEARING ON DECEMBER 17, 2021 AT 12:00 P.M. (EASTERN)

Set forth below are the matters scheduled to be heard before the Honorable Michael E. Wiles, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on December 17, 2021 beginning at 12:00 p.m. (prevailing Eastern Time).

The Debtors in these chapter 11 cases, for which joint administration has been granted, 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).



In accordance with General Order M-543 ("<u>General Order M-543</u>"), 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.

Copies of the First Day Pleadings and other pleadings for subsequent hearings may be obtained free of charge by visiting the website of KCC 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.

CHAPTER 11 PETITIONS:

- 1. Vewd Software USA, LLC (21-12065)
- 2. Vewd Software AS (21-12066)
- 3. Last Lion Holdco AS (21-12067)

FIRST DAY DECLARATIONS:

- 1. 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. 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].

FIRST DAY MOTIONS:

- 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].
 - a. Status: The order granting this motion was entered at Docket No. 23.
- 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].
 - a. Status: This matter is going forward. No objections have been filed.
- 3. Schedules and SOFAs Extension. 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].
 - a. Status: This matter is going forward. No objections have been filed.

- 4. *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].
 - a. Status: This matter is going forward. No objections have been filed.

Related Documents:

- a. Notice of Revised Proposed Order Enforcing and Restating Automatic Stay and Non-Discrimination Provisions of the Bankruptcy Code [Docket No. 29].
- 5. 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, (V) Approving Bid Procedures, (VI) Scheduling Certain Dates with Respect Thereto, (VII) Approving the Form and Manner of Notice Thereof, and (VIII) Granting Related Relief [Docket No. 17].
 - a. Status: This matter is going forward. No objections have been filed.
- 6. *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].
 - a. Status: This matter is going forward. No objections have been filed.
- 7. *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].
 - a. Status: This matter is going forward. No objections have been filed.
- 8. 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].
 - a. Status: This matter is going forward. No objections have been filed.

- 9. *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].
 - a. Status: This matter is going forward. No objections have been filed.
- 10. *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].
 - a. Status: This matter is going forward. No objections have been filed.

Related Documents:

- a. Notice of Revised Proposed Interim Order (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. 30].
- 11. *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].
 - a. Status: No Objection from the U.S. Trustee.

Related Documents:

- a. Notice of Revised Proposed Interim Order (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) Perform Intercompany Transactions, (II) Waiving Compliance with Restrictions Imposed by Section 345 of the Bankruptcy Code, and (III) Granting Related Relief [Docket No. 31].
- 12. *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].
 - a. Status: This matter is going forward. No objections have been filed.

Related Documents:

a. Notice of Revised Proposed Interim Order (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. 31].

Dated: December 16, 2021 New York, New York

ROPES & GRAY LLP

/s/ Gregg M. Galardi

Gregg M. Galardi Lucas W. Brown Katharine E. Scott 1211 Avenue of the Americas New York, New York 10036 Telephone: (212) 596-9000

Facsimile: (212) 596-9090

Email: gregg.galardi@ropesgray.com lucas.brown@ropesgray.com kothorina.scott@ropesgray.com

katharine.scott@ropesgray.com

- and -

Stephen Iacovo (admitted *pro hac vice*) 191 North Wacker Drive Chicago, Illinois 60606 Telephone: (312) 845-1200

Facsimile: (312) 596-5500

Email: stephen.iacovo@ropesgray.com

Proposed Counsel to the Debtors and Debtors in Possession