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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)
(Jointly Administered)

**AMENDED AGENDA OF MATTERS SCHEDULED FOR HEARING ON
JANUARY 31, 2022 AT 11:00 A.M. (PREVAILING EASTERN TIME)²**

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 January 31, 2022 beginning at 11:00 a.m. (prevailing Eastern Time) (“Hearing”).

¹ 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).

² **New material added since the filing of the original agenda [Docket No. 96] is listed in bold in this amended agenda.**



In accordance with General Order M-543 (“General Order M-543”), dated March 20, 2020, the January 31, 2022 hearing (the “Hearing”) will only be conducted telephonically. Any parties wishing to participate in the Hearing must make arrangements through CourtSolutions LLC. Instructions to register for CourtSolutions LLC are attached to General Order M-54.

Copies of the 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.

FINAL ORDERS ON FIRST DAY MATTERS:

1. ***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. Related Documents:

- i. Interim Order (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. 38]
- ii. Certificate of No Objection to 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. 86]

- b. Objections Filed: None.

Status: As the form of proposed order has been submitted to the Court, no hearing on this matter is required, unless the Court has any questions.

2. ***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. Related Documents:

- i. 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]
- ii. 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. 34]
- iii. Certificate of No Objection to 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. 87]
- iv. **Notice of Revised Proposed Final 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. 109]**

b. Objections Filed: None.

Status: As the form of proposed order has been submitted to the Court, no hearing on this matter is required, unless the Court has any questions.

3. ***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. Related Documents:

- i. 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. 31]

- ii. 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. 41]
- iii. Certificate of No Objection to 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. 88]
- iv. **Notice of Revised Proposed Final 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. 107]**

b. Objections Filed: None.

Status: As the form of proposed order has been submitted to the Court, no hearing on this matter is required, unless the Court has any questions.

4. **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. Related Documents:

- i. 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. 27]
- ii. 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. 35]

- iii. Certificate of No Objection to 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 [Docket No. 89]

b. Objections Filed: None.

Status: As the form of proposed order has been submitted to the Court, no hearing on this matter is required, unless the Court has any questions.

COMBINED HEARING:

1. ***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]

a. Related Documents:

- i. 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. 37]

b. Objections: None.

Status: This matter is going forward.

2. ***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]

a. Related Documents:

- i. Declaration of Jeffrey R. Miller of Kurtzman Carson Consultants LLC Regarding Solicitation of Votes and Tabulation of Ballots Cast on the Debtors' 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. 24]
- ii. Notice of Filing of Plan Supplement [Docket No. 70]

- iii. Amended 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. 75]
- iv. Revised Amended 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. 95]
- v. **Notice of Filing of Amended Plan Supplement [Docket No. 97]**
- vi. **Debtors' (I) Memorandum of Law in Support of an Order (A) Approving the Adequacy of the Disclosure Statement and (B) Confirming the Amended Joint Prepackaged Chapter 11 Plan of Reorganization of Vewd Software USA, LLC, and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code and (II) Omnibus Reply to Objections Thereto [Docket No. 98]**
- vii. **Declaration of Dan Brandt in Support of Confirmation of the Amended 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. 99]**
- viii. **Declaration of Colin Adams in Support of Confirmation of the Amended 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. 100]**
- ix. **Declaration of Richard W. Morgner in Support of Confirmation of the Amended 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. 101]**
- x. **Notice of Proposed Findings of Fact, Conclusions of Law, and Order (I) Approving the Adequacy of the Disclosure Statement and (II) Confirming the Amended 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. 102]**
- xi. **Notice of Revised Proposed Findings of Fact, Conclusions of Law, and Order (I) Approving the Adequacy of the Disclosure Statement and (II) Confirming the Amended 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. 108]**
- xii. **Notice of Withdrawal of 1325 Avenue of the Americas, L.P.'s Objection to the Joint Prepackaged Chapter 11 Plan of Reorganization of Vewd Software USA, LLC, and its Debtor Affiliates [Docket No. 113]**

xiii. Notice of Further Revised Proposed Findings of Fact, Conclusions of Law, and Order (I) Approving the Adequacy of the Disclosure Statement and (II) Confirming the Amended 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. 114]

b. Objections Filed:

- i. 1325 Avenue of the Americas, L.P.'s Objection to the Joint Prepackaged Chapter 11 Plan of Reorganization of Vewd Software USA, LLC, and its Debtor Affiliates [Docket No. 84]

Status: This matter is going forward.

UNCONTESTED MATTERS:

Retention Applications

1. ***KCC Retention.*** Debtors' Application for Entry of an Order Authorizing Employment and Retention of Kurtzman Carson Consultants LLC as Administrative Advisor as of the Petition Date [Docket No. 59]

- a. Related Documents:

- i. Certificate of No Objection to Debtors' Application for Entry of an Order Authorizing Employment and Retention of Kurtzman Carson Consultants LLC as Administrative Advisor as of the Petition Date [Docket No. 90]

- b. Objections Filed: None.

Status: As the form of proposed order has been submitted to the Court, no hearing on this matter is required, unless the Court has any questions.

2. ***Jefferies Retention.*** Application of the Debtors and Debtors in Possession for Entry of an Order (I) Authorizing the Retention and Employment of Jefferies LLC as Investment Banker Pursuant to 11 U.S.C. §§ 327(a) and 328(a), Effective as of December 15, 2021 (II) Waiving Certain Information Requirements of Local Bankruptcy Rule 2016-1 and (III) Granting Related Relief [Docket No. 60]

- a. Related Documents:

- i. Certificate of No Objection to Application of the Debtors and Debtors in Possession for Entry of an Order (I) Authorizing the Retention and Employment of Jefferies LLC as Investment Banker Pursuant to 11 U.S.C. §§ 327(a) and 328(a), Effective as of December 15, 2021 (II) Waiving Certain Information Requirements of Local Bankruptcy Rule 2016-1 and (III) Granting Related Relief [Docket No. 91]

- b. Objections Filed: None.

Status: As the form of proposed order has been submitted to the Court, no hearing on this matter is required, unless the Court has any questions.

3. ***EY Retention.*** Debtors' Application for an Order Authorizing the Retention and Employment of Ernst & Young LLP as Financial Advisor to the Debtors Effective as of the Petition Date [Docket No. 61]

a. Related Documents:

- i. Certificate of No Objection to Debtors' Application for an Order Authorizing the Retention and Employment of Ernst & Young LLP as Financial Advisor to the Debtors Effective as of the Petition Date [Docket No. 92]

b. Objections Filed: None.

Status: As the form of proposed order has been submitted to the Court, no hearing on this matter is required, unless the Court has any questions.

4. ***RG Retention***. Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Ropes & Gray LLP as Attorneys for the Debtors Effective as of the Petition Date [Docket No. 62]

a. Related Documents:

- i. Certificate of No Objection to Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Ropes & Gray LLP as Attorneys for the Debtors Effective as of the Petition Date [Docket No. 93]

b. Objections Filed: None.

Status: As the form of proposed order has been submitted to the Court, no hearing on this matter is required, unless the Court has any questions.

Miscellaneous

1. ***Bar Date Application***. Debtors' Application for Entry of an Order Establishing Deadlines to File Proofs of Claim and Approving the Form and Manner of Notice Thereof [Docket No. 83]

a. Related Documents: None.

b. Objections Filed: None.

Status: This matter is going forward.

[Text Continues on the Next Page]

Dated: January 31, 2022
New York, New York

ROPES & GRAY LLP

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