

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

Chapter 11

HRI HOLDING CORP., *et al.*<sup>1</sup>

Case No. 19-12415 (MFW)

Debtors.

(Jointly Administered)

**Hearing Date: December 5, 2019 at 2:00 p.m. (ET)**

**Objection Deadline: December 2, 2019 at 4:00 p.m. (ET)**

**Ref. Nos. 4, 5, 6, 7, 8, 9, 10 & 12**

**OMNIBUS NOTICE OF CERTAIN SECOND DAY HEARING MOTIONS**

**PLEASE TAKE NOTICE** that on November 14, 2019, the above-captioned debtors and debtors-in-possession (the “Debtors”) filed the following motions (the “Motions”) with the United States Bankruptcy Court for the District of Delaware (the “Court”):

1. Motion of the Debtors for Entry of Interim and Final Orders (A) Authorizing the Maintenance of Bank Accounts and Continued Use of Existing Business Forms and Checks, (B) Authorizing the Continued Use of Existing Cash Management System and (C) Granting Limited Relief from the Requirements of Bankruptcy Code Section 345(b) and the United States Trustee Operating Guidelines [D.I. 4]
2. Motion of the Debtors for Entry of Interim and Final Orders (A) Prohibiting Utilities from Altering, Refusing or Discontinuing Service, (B) Deeming Utilities Adequately Assured of Future Performance and (C) Establishing Procedures for Determining Adequate Assurance of Payment [D.I. 5]
3. Motion of the Debtors for Interim and Final Orders Authorizing the Debtors to (I) Maintain Existing Insurance Policies and Pay All Policy Premiums Arising Thereunder and Renew or Enter into New Policies and (II) Continue Insurance Premium Financing Program, Pay Insurance Premium Financing Obligations Arising in Connection Therewith and Renew or Enter into New Premium Financing Arrangements [D.I. 6]

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: HRI Holding Corp. (4677), Houlihan’s Restaurants, Inc. (8489), HDJG Corp. (3479), Red Steer, Inc. (2214), Sam Wilson’s/Kansas, Inc. (5739), Darryl’s of St. Louis County, Inc. (7177), Darryl’s of Overland Park, Inc. (3015), Houlihan’s of Ohio, Inc. (6410), HRI O’Fallon, Inc. (4539), Algonquin Houlihan’s Restaurant, L.L.C. (0449), Geneva Houlihan’s Restaurant, L.L.C. (3156), Hanley Station Houlihan’s Restaurant, LLC (4948), Houlihan’s Texas Holdings, Inc. (5485), Houlihan’s Restaurants of Texas, Inc. (4948), JGIL Mill OP LLC (0741), JGIL Millburn, LLC (6071), JGIL Millburn Op LLC (N/A), JGIL, LLC (5485), JGIL Holding Corp. (N/A), JGIL Omaha, LLC (5485), HOP NJ NY, LLC (1106), HOP Farmingdale LLC (7273), HOP Cherry Hill LLC (5012), HOP Paramus LLC (5154), HOP Lawrenceville LLC (5239), HOP Brick LLC (4416), HOP Secaucus LLC (5946), HOP Heights LLC (6017), HOP Bayonne LLC (7185), HOP Fairfield LLC (8068), HOP Ramsey LLC (8657), HOP Bridgewater LLC (1005), HOP Parsippany LLC (1520), HOP Westbury LLC (2352), HOP Weehawken LLC (2571), HOP New Brunswick LLC (2637), HOP Holmdel LLC (2638), HOP Woodbridge LLC (8965), and Houlihan’s of Chesterfield, Inc. (5073). The Debtors’ corporate headquarters and the mailing address is 8700 State Line Road, Suite 100, Leawood, Kansas 66206. {1247.002-W0058814.}



4. Motion of the Debtors for Entry of Interim and Final Orders (A) Authorizing the Debtors to Pay All or a Portion of the Prepetition Claims of Certain Critical Vendors and (B) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers [D.I. 7]
5. Motion of the Debtors for Entry of Interim and Final Orders, Pursuant to 11 U.S.C. §§ 105(a), 363, 507(a)(2), 541, 1107(a), and 1108 (I) Authorizing the Payment of Prepetition Claims Arising Under (A) the Perishable Agricultural Commodities Act and (B) the Packers and Stockyards Act and (II) Authorizing Banks to Honor and Process Checks and Electronic Transfer Requests Related to the Foregoing [D.I. 8]
6. Motion of the Debtors for Entry of an Order (I) Authorizing the Debtors to Pay Certain Prepetition Tax and Fee Obligations and (II) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers [D.I. 9]
7. Motion for Entry of Interim and Final Orders Authorizing the Debtors to Pay Prepetition Wages, Compensation, Employee Benefits and Other Associated Obligations [D.I. 10]
8. Motion of the Debtors and Debtors-in-Possession for Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Post-Petition Financing, (B) Grant Liens and Superpriority Administrative Expense Claims to Post-Petition Lenders and (C) Utilize Cash Collateral, (II) Providing Adequate Protection to the Pre-Petition Secured Parties, (III) Modifying the Automatic Stay, (IV) Granting Related Relief, Pursuant to 11 U.S.C. Sections 105, 361, 362, 363, 364 and 507, and (V) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001 and Local Rule 4001-2 [D.I. 12]

**PLEASE TAKE FURTHER NOTICE** that a hearing on the Motions was held on November 15, 2019, after which the Court entered orders granting the Motions on an interim basis [53, 55, 57, 58, 59, 60, 61, & 63] (the “First Day Orders”). Concurrently herewith, you are being served with certain of these Motions and the First Day Orders.

**PLEASE TAKE FURTHER NOTICE** that a hearing to consider the Motions on a final basis is scheduled for **December 5, 2019 at 2:00 p.m. (ET)** before the Honorable Mary F. Walrath, United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 5<sup>th</sup> Floor, Courtroom No. 4, Wilmington, Delaware 19801.

**PLEASE TAKE FURTHER NOTICE** that responses or objections, if any, to the relief requested in the Motions must be filed with the United States Bankruptcy Court, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before **December 2, 2019, at 4:00 P.M. (ET)**. At the same time, you must also serve a copy of the objection upon the following parties so as to be received no later than **December 2, 2019, at 4:00 P.M. (ET)**: (a) proposed counsel to the Debtors, (i) Landis Rath & Cobb LLP, 919 Market Street, Suite 1800, Wilmington, Delaware 19801, Attn: Adam G. Landis and Kimberly A. Brown; (b) counsel for the DIP Agent and Pre-Petition Agent, (i) Katten Muchin Rosenman LLP, 575 Madison Ave, New York, New York 10022, Attn: William B. Freeman Esq. and Karen B. Dine Esq. and (ii) Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, Delaware 19801 Attn: Sean Beach, Esq. and Jaime Luton Chapman, Esq.; and (c) the Office of The United States Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801, Attn: Jane Leamy, Esq.

**PLEASE TAKE FURTHER NOTICE** that copies of the Motions and the First Day Orders can be obtained through the website of the Debtors' notice and claims agent, Kurtzman Carson Consultants LLC ("KCC") at [www.kccllc.net/hri](http://www.kccllc.net/hri); from the Bankruptcy Court's website, [www.deb.uscourts.gov](http://www.deb.uscourts.gov), for a fee; or by request by calling KCC at (877) 725-7530 (toll free) or via electronic mail at [HoulihansInfo@kccllc.com](mailto:HoulihansInfo@kccllc.com) or upon request from the undersigned proposed counsel to the Debtors.

A FINAL HEARING ON THE MOTIONS WILL BE HELD ON **DECEMBER 5, 2019, AT 2:00 P.M. (ET)**. BEFORE THE HONORABLE MARY F. WALRATH, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, 5<sup>TH</sup> FLOOR, COURTROOM NO. 4 WILMINGTON, DELAWARE 19801.

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

Dated: November 15, 2019  
Wilmington, Delaware

**LANDIS RATH & COBB LLP**



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Adam G. Landis (No. 3407)  
Kimberly A. Brown (No. 5138)  
Matthew R. Pierce (No. 5946)  
Nicolas E. Jenner (No. 6554)  
919 Market Street, Suite 1800  
Wilmington, Delaware 19801  
Telephone: (302) 467-4400  
Facsimile: (302) 467-4450  
Email: [landis@lrclaw.com](mailto:landis@lrclaw.com)  
[brown@lrclaw.com](mailto:brown@lrclaw.com)  
[pierce@lrclaw.com](mailto:pierce@lrclaw.com)  
[jenner@lrclaw.com](mailto:jenner@lrclaw.com)

*Proposed Counsel for the Debtors  
and Debtors-In-Possession*