

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

CBC RESTAURANT CORP., et al.,¹

Debtors.

Chapter 11

Case No. 23-10245 (KBO)
(Jointly Administered)

Hearing Date:
June 1, 2023 at 1:30 p.m. (ET)

Re: Docket Nos. 289, 361, 551

**NOTICE OF SUBMISSION OF ORDER AUTHORIZING CBC RESTAURANT CORP.
AND ITS AFFILIATED DEBTORS TO (I) SELL SUBSTANTIALLY ALL OF THE
DEBTORS' ASSETS FREE AND CLEAR OF ALL LIENS, CLAIMS, PERMITTED
LIENS, AND INTERESTS, (II) AUTHORIZING AND APPROVING THE DEBTORS'
PERFORMANCE UNDER THE APA, (III) AUTHORIZING AND APPROVING THE
ASSUMPTION AND ASSIGNMENT OF CERTAIN OF THE DEBTORS' EXECUTORY
CONTRACTS, UNEXPIRED LEASES, AND PERMITS RELATED THERETO,
AND (IV) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE THAT attached hereto as **Exhibit A** is a proposed form of order with respect to the *Debtors' Motion for Entry of Orders: (I)(A) Approving Bidding Procedures for the Sale of All or Substantially All of the Debtors' Assets; (B) Authorizing the Debtors to Enter Into a Stalking Horse Agreement; (C) Scheduling an Auction and Approving the Form and Manner of Notice Thereof; (D) Approving Assumption and Assignment Procedures; and (E) Scheduling a Sale Hearing and Approving the Form and Manner of Notice Thereof; (II)(A) Approving the Sale of the Debtors' Assets Free and Clear of Liens, Claims, Interests and Encumbrances and (B) Approving the Assumption and Assignment of Executory Contracts and*

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include CBC Restaurant Corp. (0801) (the "Debtor"), Corner Bakery Holding Company (3981), and CBC Cardco, Inc. (1938) (together with Corner Bakery Holding Company, the "Debtor Affiliates" and additionally with the Debtor, the "Debtors"). The Debtors' service address is 121 Friends Lane, Suite 301, Newtown PA 18940.



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Unexpired Leases; and (III) Granting Related Relief [D.I. No. 289] and the *Notice of Filing of Proposed Asset Purchase Agreement* [D.I. No. 552].

PLEASE TAKE FURTHER NOTICE that the attached, proposed form of order has been circulated in draft form to various parties including the United States Trustee, certain taxing agencies, and various lease and contract counterparties. While it reflects many comments that have been received, it is subject to further revision and to further comment from all parties, including further review and revision by the debtors and the proposed buyer.

Dated: June 1, 2023
Wilmington, Delaware

/s/ Mette H. Kurth

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