

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

In re: ) Chapter 11  
 )  
FUSE, LLC, *et al.*,<sup>1</sup> ) Case No.: 19-10872 (KG)  
 )  
 )  
\_\_\_\_\_ Debtors. ) (Joint Administration Requested)

**NOTICE OF HEARING ON FIRST DAY MOTIONS**

**PLEASE TAKE NOTICE** that, on April 22, 2019 (the “Petition Date”), Fuse Media, Inc., Fuse Media, LLC, Fuse, LLC, JAAM Productions, LLC, SCN Distribution, LLC, Latino Events LLC, Fuse Holdings LLC, Fuse Finance, Inc., and FM Networks LLC, the debtors and debtors-in-possession (the “Debtors”) in the above-captioned chapter 11 cases, each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), with the Clerk of the United States Bankruptcy Court for the District of Delaware. The Debtors are continuing to operate their businesses and manage their affairs as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

**PLEASE TAKE FURTHER NOTICE** that, together with their chapter 11 petitions, the Debtors also filed the following applications and motions (collectively, the “First Day Motions”). A hearing to consider the First Day Motions (the “First Day Hearing”) will be held on **April 24, 2019 at 11:30 a.m. (prevailing Eastern Time)**, before the Honorable Kevin Gross at the United States Bankruptcy Court for the District of Delaware (the “Court”), located at 824 North Market Street, 6th Floor, Courtroom No. 3, Wilmington, Delaware 19801.

<sup>1</sup> The Debtors and the last four digits of their taxpayer identification numbers include: Fuse Media, Inc. (9721); Fuse Media, LLC (0560); Fuse, LLC (1888); JAAM Productions, LLC (5499); SCN Distribution, LLC (9656); Latino Events LLC (8204); Fuse Holdings LLC (5673); Fuse Finance, Inc. (8683); and FM Networks LLC (6500). The Debtors’ headquarters and service address is 700 North Central Avenue, Suite 600, Glendale, CA 91203.



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**First Day Declaration**

1. Declaration of Miguel Roggero in Support of First Day Motions [Filed 4/23/19] (Docket No. 3)

**First Day Administrative and Procedural Motions**

2. Debtors' Motion for Order Directing Joint Administration of Related Chapter 11 Cases for Procedural Purposes Only [Filed 4/23/19] (Docket No. 2)
3. Debtors' Motion for Order (I) Authorizing the Debtors to File (A) Consolidated List of Creditors and (B) Consolidated List of Debtors' Top Thirty Unsecured Creditors; and (II) Granting Related Relief [Filed 4/23/19] (Docket No. 4)
4. Application for an Order Appointing Kurtzman Carson Consultants LLC as Claims and Noticing Agent for the Debtors Pursuant to 28 U.S.C. § 156(C), 11 U.S.C. § 105(A) and LBR 2002-1(F) [Filed 4/23/19] (Docket No. 5)

**First Day Motions Pertaining to Operations and Related Issues**

5. Motion for Entry of an Order (I) Authorizing the Debtors to (A) Pay and Honor Prepetition Compensation, Reimbursable Business Expenses, and Employee Benefit Obligations; and (B) Maintain and Continue Certain Compensation and Benefit Programs Postpetition; and (II) Granting Related Relief [Filed 4/23/19] (Docket No. 6)
6. Debtors' Motion for Entry of an Order (A) Authorizing Debtors to Pay Prepetition Claims of Critical Vendors and (B) Granting Related Relief [Filed 4/23/19] (Docket No. 8)
7. Debtors' Motion Pursuant to Sections 105(a), 507(a)(8), and 541(d) of the Bankruptcy Code for an Order Authorizing the Payment of Prepetition Sales and Franchise Taxes and Similar Taxes and Fees [Filed 4/23/19] (Docket No. 9)
8. Debtors' Motion for Interim and Final Orders (A) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (B) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Services, (C) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, and (D) Granting Related Relief [Filed 4/23/19] (Docket No. 10)

**First Day Motion Pertaining to Financing and Cash Management**

9. Debtors' Motion for Order Under Sections 105, 345, 363, 364, 503, 1107 and 1108 of the Bankruptcy Code Authorizing (I) Maintenance of Existing Bank Accounts; (II) Continuance of Existing Cash Management System, Bank Accounts, Checks and Related Forms; (III) Continued Performance of

Intercompany Transactions; (IV) Limited Waiver of Section 345(b) Deposit and Investment Requirements and (V) Granting Related Relief [Filed 4/23/19] (Docket No. 7)

10. Motion of Debtors Pursuant to Sections 105, 361, 362, 363, 503 and 507 of the Bankruptcy Code, Bankruptcy Rules 2002, 4001 and 9014 and Local Rules 2002-1(b), 4001-2, 9013-1(m) for Entry of Interim and Final Orders, (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, and (IV) Scheduling a Final Hearing [Filed 4/23/19] (Docket No. 11)

**Solicitation Motion for Scheduling**

11. Debtors' Motion for Entry of an Order (I) Scheduling Combined Hearing On (A) Adequacy of Disclosure Statement, (B) Confirmation of Prepackaged Plan of Reorganization, and (C) the Assumption of Executory Contracts and Cure Amounts; (II) Fixing the Deadlines to Object to Disclosure Statement, Prepackaged Plan, and Proposed Assumption or Rejection of Executory Contracts and Cure Amounts; (III) Approving (A) Prepetition Solicitation Procedures and (B) Form and Manner of Notice of Commencement, Combined Hearing, Assumption of Executory Contracts and Cure Amounts Related Thereto, and Objection Deadlines; (IV) Conditionally (A) Directing the United States Trustee Not to Convene Section 341(a) Meeting of Creditors and (B) Waiving Requirement of Filing Statements of Financial Affairs And Schedules of Assets and Liabilities; and (V) Granting Related Relief [Filed 4/23/19] (Docket No. 12)

**PLEASE TAKE FURTHER NOTICE** that copies of the First Day Motions can be obtained by contacting the undersigned proposed counsel, through the Court's website at [www.deb.uscourts.gov](http://www.deb.uscourts.gov), referencing Case No. 19-10872 (KG), by contacting the Debtors' claims agent at [FuseMediaInfo@kccllc.com](mailto:FuseMediaInfo@kccllc.com), by accessing the website of the Debtors' claims agent at <http://www.kccllc.net/fuse>, or by calling (888) 647-1737 (or (310) 751-2624 (International)).

**PLEASE TAKE FURTHER NOTICE** that any and all objections to the First Day Motions may be made at the First Day Hearing.

Dated: April 23, 2019

PACHULSKI STANG ZIEHL & JONES LLP

*/s/ James E. O'Neill*

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