

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

SECURE HOME HOLDINGS LLC, *et al.*,

Debtors.¹

Chapter 11

Case No. 21-10745 (JKS)

(Jointly Administered)

**AMENDED² NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING
ON MAY 25, 2021 AT 1:30 P.M. (PREVAILING EASTERN TIME)**

**PLEASE NOTE THAT THE HEARING WILL BE CONDUCTED ENTIRELY VIA ZOOM AND
REQUIRES ALL PARTICIPANTS TO REGISTER IN ADVANCE NO LATER THAN 4:00 P.M.
(PREVAILING EASTERN TIME) ON MAY 24, 2021.**

COURTCALL WILL NOT BE USED TO DIAL IN

PLEASE USE THE FOLLOWING LINK TO REGISTER FOR THE HEARING:

<https://debuscourts.zoomgov.com/meeting/register/vJlscOmvqDIqHcliyKcVtZtKXn01CTM-fgl>

**I. MATTERS FILED UNDER CERTIFICATION OF COUNSEL/CERTIFICATE OF NO
OBJECTION:**

1. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Continued Use of Existing Cash Management System, Bank Accounts, and Business Forms and Payment of Related Prepetition Obligations; (II) Modifying Certain Deposit Requirements; and (III) Authorizing Continuance of Intercompany Transactions and Honoring Certain Related Prepetition Obligations, filed on May 25, 2021 [[Docket No. 8](#)].

Objection Deadline: May 18, 2021 at 4:00 p.m. (*prevailing* Eastern Time).

Responses Received: None.

¹ The Debtors in these chapter 11 cases, along with the last four digits of their respective tax identification numbers, are as follows: Secure Home Holdings LLC (1583); ACA Security Systems GP, LLC (5674); ACA Security Systems LP (3613); Hawk Creation, LLC (3525); and My Alarm Center, LLC (0273). The address of the Debtors' corporate headquarters is 3803 West Chester Pike, Suite 100, Newtown Square, Pennsylvania 19073.

² All amended items appear in **bold**.



Related Pleadings:

- A. *Interim Order (i) Authorizing Continued Use of Existing Cash Management System, Bank Accounts, and Business Forms and Payment of Related Postpetition Obligations; (ii) Modifying Certain Deposit Requirements and (iii) Authorizing Continuance of Intercompany Transactions and Honoring Certain Related Prepetition Obligations*, entered on April 27, 2021 [[Docket No. 56](#)].
- B. Notice of Motions and Hearing, filed on April 28, 2021 [[Docket No. 69](#)].
- C. Certificate of No Objection, filed on May 19, 2021 [Docket No. 107].
- D. ***Final Order (i) Authorizing Continued Use of Existing Cash Management System, Bank Accounts, and Business Forms and Payment of Related Postpetition Obligations; (ii) Modifying Certain Deposit Requirements and (iii) Authorizing Continuance of Intercompany Transactions and Honoring Certain Related Prepetition Obligations***, entered on May 24, 2021 [[Docket No. 135](#)].

Status: **The order has been entered.**

- 2. Debtors' Motion for Entry of Interim and Final Orders Authorizing Debtors to Pay Prepetition Wages, Compensation, and Employee Benefits, filed on April 25, 2021 [[Docket No. 9](#)].

Objection Deadline: May 18, 2021 at 4:00 p.m. (*prevailing* Eastern Time).

Responses Received: None.

Related Pleadings:

- A. *Interim Order Authorizing Debtors to Pay Prepetition Wages, Compensation, and Employee Benefits*, entered on April 27, 2021 [[Docket No. 57](#)].
- B. Notice of Motions and Hearing, filed on April 28, 2021 [[Docket No. 69](#)].
- C. Certification of Counsel Regarding *Final Order Authorizing Debtors to Pay Prepetition Wages, Compensation, and Employee Benefits*, filed on May 19, 2021 [[Docket No. 108](#)].
- D. ***Final Order Authorizing Debtors to Pay Prepetition Wages, Compensation, and Employee Benefits***, entered on May 24, 2021 [[Docket No. 136](#)].

Status: **The order has been entered.**

- 3. Debtors' Motion for Entry of Interim and Final Orders Authorizing Debtors to Pay Certain Prepetition Taxes and Related Obligations, filed on April 25, 2021 [[Docket No. 10](#)].

Objection Deadline: May 18, 2021 at 4:00 p.m. (*prevailing* Eastern Time).

Responses Received: None.

Related Pleadings:

- A. *Interim* Order Authorizing Debtors to Pay Certain Prepetition Taxes and Related Obligations, entered on April 27, 2021 [[Docket No. 58](#)].
- B. Notice of Motions and Hearing, filed on April 28, 2021 [[Docket No. 69](#)].
- C. Certification of Counsel Regarding *Final* Order Authorizing Debtors to Pay Certain Prepetition Taxes and Related Obligations, filed on May 19, 2021 [[Docket No. 109](#)].
- D. *Final* Order Authorizing Debtors to Pay Certain Prepetition Taxes and Related Obligations, entered on May 24, 2021 [[Docket No. 137](#)].**

Status: **The order has been entered.**

- 4. Debtors' Motion for Entry of Interim and Final Orders (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment; (II) Establishing Procedures for Resolving Objections by Utility Companies; and (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, filed on April 25, 2021 [[Docket No. 11](#)].

Objection Deadline: May 18, 2021 at 4:00 p.m. (*prevailing* Eastern Time).

Responses Received: None.

Related Pleadings:

- A. *Interim* Order (i) Approving Debtors' Proposed Form of Adequate Assurance of Payment; (ii) Establishing Procedures for Resolving Objections by Utility Companies; and (iii) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, entered on April 27, 2021 [[Docket No. 59](#)].
- B. Notice of Motions and Hearing, filed on April 28, 2021 [[Docket No. 69](#)].
- C. Certification of Counsel Regarding *Final* Order (i) Approving Debtors' Proposed Form of Adequate Assurance of Payment; (ii) Establishing Procedures for Resolving Objections by Utility Companies; and (iii) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, filed on May 19, 2021 [[Docket No. 110](#)].
- D. *Final* Order (i) Approving Debtors' Proposed Form of Adequate Assurance of Payment; (ii) Establishing Procedures for Resolving Objections by Utility Companies; and (iii) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, entered on May 24, 2021 [[Docket No. 138](#)].**

Status: **The order has been entered.**

5. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Honor Certain Prepetition Obligations to Customers and Continue Certain Customer Programs in the Ordinary Course of Business, and (II) Granting Related Relief, filed on April 25, 2021 [[Docket No. 12](#)].

Objection Deadline: May 18, 2021 at 4:00 p.m. (*prevailing* Eastern Time).

Responses Received: None.

Related Pleadings:

- A. *Interim* Order (i) Authorizing the Debtors to Honor Certain Prepetition Obligations to Customers and Continue Certain Customer Programs in the Ordinary Course of Business, and (ii) Granting Related Relief, entered on April 27, 2021 [[Docket No. 60](#)].
- B. Notice of Motions and Hearing, filed on April 28, 2021 [[Docket No. 69](#)].
- C. Certification of Counsel Regarding *Final* Order (i) Authorizing the Debtors to Honor Certain Prepetition Obligations to Customers and Continue Certain Customer Programs in the Ordinary Course of Business, and (ii) Granting Related Relief, filed on May 19, 2021 [[Docket No. 111](#)].
- D. ***Final* Order (i) Authorizing the Debtors to Honor Certain Prepetition Obligations to Customers and Continue Certain Customer Programs in the Ordinary Course of Business, and (ii) Granting Related Relief, entered on May 24, 2021 [[Docket No. 139](#)].**

Status: **The order has been entered.**

6. Debtors' Motion for Entry of Interim and Final Orders Authorizing Debtors to (I) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder and (II) Continue to Honor Premium Financing Obligations, and (III) Renew, Revise, Extend, Supplement, Change, or Enter into New Insurance Policies and Insurance Premium Financing Agreements, filed on April 25, 2021 [[Docket No. 13](#)].

Objection Deadline: May 18, 2021 at 4:00 p.m. (*prevailing* Eastern Time).

Responses Received: None.

Related Pleadings:

- A. *Interim Order Authorizing Debtors to (i) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder, (ii) Continue to Honor Premium Financing Obligations, and (iii) Renew, Revise, Extend, Supplement, Change, or Enter into New Insurance Policies and Insurance Premium Financing Agreements, entered on April 27, 2021 [Docket No. 61].*
- B. Notice of Motions and Hearing, filed on April 28, 2021 [[Docket No. 69](#)].
- C. Certification of Counsel Regarding *Final Interim Order Authorizing Debtors to (i) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder, (ii) Continue to Honor Premium Financing Obligations, and (iii) Renew, Revise, Extend, Supplement, Change, or Enter into New Insurance Policies and Insurance Premium Financing Agreements, filed on May 19, 2021 [Docket No. 112].*
- D. ***Final Order Authorizing Debtors to (i) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder, (ii) Continue to Honor Premium Financing Obligations, and (iii) Renew, Revise, Extend, Supplement, Change, or Enter into New Insurance Policies and Insurance Premium Financing Agreements, entered on May 24, 2021 [Docket No. 140].***

Status: **The order has been entered.**

- 7. Application of the Debtors for Entry of an Order Authorizing the Retention and Employment of Chipman Brown Cicero & Cole, LLP as Counsel to the Debtors Effective as of the Petition Date, filed on May 4, 2021 [[Docket No. 78](#)].

Objection Deadline: May 18, 2021 at 4:00 p.m. (*prevailing* Eastern Time).

Responses Received: Informal inquiry of the U.S. Trustee.

Related Pleadings:

- A. Certificate of No Objection, filed on May 19, 2021 [[Docket No. 113](#)].
- B. **Order Authorizing the Retention and Employment of Chipman Brown Cicero & Cole, LLP as Counsel to the Debtors Effective as of the Petition Date, entered on May 24, 2021 [[Docket 141](#)].**

Status: **The order has been entered.**

- 8. Debtors' Motion Pursuant to 11 U.S.C. §§ 105(a) and 363(b) to (I) Retain M3 Partners, LP to Provide the Debtors Chief Restructuring Officers and Certain Additional Personnel and (II) Designate Mohsin Meghji and Keshav Lall as Co-Chief Restructuring Officers for the Debtors Effective as of the Petition Date, filed on May 4, 2021 [[Docket No. 79](#)].

Objection Deadline: May 18, 2021 at 4:00 p.m. (*prevailing* Eastern Time).

Responses Received:

A. Informal comments of the U.S. Trustee.

Related Pleadings:

- A. *Supplemental* Declaration of Mohsin Meghji in Support of the Debtors' Motion Pursuant to 11 U.S.C. §§ 105(a) and 363(b) to (I) Retain M3 Partners, LP to Provide the Debtors Chief Restructuring Officers and Certain Additional Personnel and (II) Designate Mohsin Meghji and Keshav Lall as Co-Chief Restructuring Officers for the Debtors Effective as of the Petition Date (the "**Supplemental Declaration**"), filed on May 17, 2021 [[Docket No. 98](#)].
- B. Certification of Counsel Regarding Debtors' Motion Pursuant to 11 U.S.C. §§ 105(a) and 363(b) to (I) Retain M3 Partners, LP to Provide the Debtors Chief Restructuring Officers and Certain Additional Personnel and (II) Designate Mohsin Meghji and Keshav Lall as Co-Chief Restructuring Officers for the Debtors Effective as of the Petition Date, filed on May 19, 2021 [[Docket No. 114](#)].
- C. **Order Authorizing the Debtors, Pursuant to 11 U.S.C. §§ 105(a) and 363(b) to (I) Retain M3 Partners, LP to Provide the Debtors Chief Restructuring Officers and Certain Additional Personnel and (II) Designate Mohsin Meghji and Keshav Lall as Co-Chief Restructuring Officers for the Debtors Effective as of the Petition Date, entered on May 24, 2021 [[Docket No. 147](#)].**

Status: **The order has been entered.**

9. Debtors' Application for Entry of an Order (i) Authorizing the Employment and Retention of Raymond James & Associates, Inc. as Investment Banker for the Debtors, Effective as of the Petition Date, (ii) Waiving Certain Reporting Requirements Pursuant to Local Bankruptcy Rule 2016-2, and (iii) Granting Related Relief, filed on May 4, 2021 [[Docket No. 81](#)].

Objection Deadline: May 18, 2021 at 4:00 p.m. (*prevailing* Eastern Time).

Responses Received:

A. Informal comments of the U.S. Trustee.

Related Pleadings:

- A. Notice of Filing of Amended and Restated Declaration of Geoffrey Richards in Support of the Debtors' Application for Entry of an Order (i) Authorizing the Employment and Retention of Raymond James & Associates, Inc. as Investment Banker for the Debtors, Effective as of the Petition Date, (ii) Waiving Certain Reporting Requirements Pursuant to Local Bankruptcy Rule 2016-2, and (iii)

Granting Related Relief (the “**Amended Declaration**”), filed on May 14, 2021 [[Docket No. 97](#)].

- B. *Second Amended and Restated Declaration of Geoffrey Richards in Support of the Debtors’ Application for Entry of an Order (i) Authorizing the Employment and Retention of Raymond James & Associates, Inc. as Investment Banker for the Debtors, Effective as of the Petition Date, (ii) Waiving Certain Reporting Requirements Pursuant to Local Bankruptcy Rule 2016-2, and (iii) Granting Related Relief (the “**Second Amended Declaration**”), filed on May 18, 2021 [[Docket No. 106](#)].*
- C. Certification of Counsel Regarding Debtors’ Application for Entry of an Order (i) Authorizing the Employment and Retention of Raymond James & Associates, Inc. as Investment Banker for the Debtors, Effective as of the Petition Date, (ii) Waiving Certain Reporting Requirements Pursuant to Local Bankruptcy Rule 2016-2, and (iii) Granting Related Relief, filed on May 19, 2021 [[Docket No. 115](#)].
- D. **Order (i) Authorizing the Employment and Retention of Raymond James & Associates, Inc. as Investment Banker for the Debtors, Effective as of the Petition Date, (ii) Waiving Certain Reporting Requirements Pursuant to Local Bankruptcy Rule 2016-2, and (iii) Granting Related Relief, entered on May 24, 2021 [[Docket No. 152](#)].**

Status: **The order has been entered.**

- 10. Motion of Debtors for Entry of an Order Approving Procedures for the Retention and Compensation of Ordinary Course Professionals Effective as of the Petition Date, filed on May 4, 2021 [[Docket No. 82](#)].

Objection Deadline: May 18, 2021 at 4:00 p.m. (*prevailing Eastern Time*).

Responses Received:

- A. Informal comments of the U.S. Trustee.

Related Pleadings:

- A. Certification of Counsel Regarding Motion of Debtors for Entry of an Order Approving Procedures for the Retention and Compensation of Ordinary Course Professionals Effective as of the Petition Date, filed on May 19, 2021 [[Docket No. 116](#)].
- B. **Order Approving Procedures for the Retention and Compensation of Ordinary Course Professionals Effective as of the Petition Date, entered on May 24, 2021 [[Docket No. 142](#)].**

Status: **The order has been entered.**

II. MATTERS GOING FORWARD:

11. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Post-Petition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 364(c)(1), 364(c)(2), 364(c)(3), 364(d) and 364(e), (B) Granting Senior Liens and Superpriority Administrative Expense Status; (II) Scheduling Final Hearing; and (III) Granting Related Relief, filed on April 26, 2021 [[Docket No. 14](#)].

Objection Deadline: May 18, 2021 at 4:00 p.m. (*prevailing* Eastern Time).

Responses Received:

- A. Informal comments received from Bank of America, N.A.
- B. Informal comments received from Goldman Sachs Special Lending Group, L.P., as agent for the Prepetition Second Lien Lenders.

Related Pleadings:

- A. Declaration of Geoffrey Richards in Support of the Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Post-Petition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 364(c)(1), 364(c)(2), 364(c)(3), 364(d) and 364(e), (B) Granting Senior Liens and Superpriority Administrative Expense Status; (II) Scheduling Final Hearing; and (III) Granting Related Relief, filed on April 26, 2021 [[Docket No. 15](#)].
- B. Debtors' Motion for Entry of an Order Authorizing the Filing Under Seal of the Proposed Debtor-in-Possession Financing Fee Letter, filed on April 26, 2021 [[Docket No. 16](#)].
- C. Notice of Filing Sealed Version of the Debtor in Possession Financing Fee Letter, filed on April 26, 2021 [[Docket No. 17](#)].
- D. *Interim* Order (i) Authorizing the Debtors to Obtain Postpetition Financing; (ii) Granting Adequate Protection to Prepetition Secured Parties; and (iii) Granting Related Relief, entered on April 28, 2021 [[Docket No. 67](#)].
- E. Notice of Motions and Hearing, filed on April 28, 2021 [[Docket No. 69](#)].
- F. Order Pursuant to 11 U.S.C. §§ 105 and 107, Fed. R. Bankr. P. 9019, and Del. Bankr. L.R. 9017-1 Authorizing the Debtors to File Under Seal the Proposed Debtor In Possession Financing Fee Letter [[Docket No. 70](#)].
- G. Notice of Filing Proposed *Final* Order (I) Authorizing the Debtors to Obtain Postpetition Financing; (II) Granting Adequate Protection to Prepetition Secured Parties; and (III) Granting Related Relief, filed on May 24, 2021 [[Docket No. 154](#)].**

Status: The Debtors and the DIP Lender are working to incorporate language in the form of Final Order to address the informal comments received from Bank of America and Goldman Sachs. This matter will go forward.

12. 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 Prepetition Solicitation Procedures, (IV) Approving the Combined Hearing Notice, (V) Approving Notice and Objection Procedures for the Assumption of Executory Contracts and Unexpired Leases, (VI) Waiving the Requirement of Filing Schedules, Statements of Financial Affairs, Rule 2015.3 Reports and Section 341 Meeting of Creditors and (VII) Granting Related Relief, filed on April 26, 2021 [[Docket No. 20](#)].

Objection Deadline: May 18, 2021 at 4:00 p.m. (*prevailing* Eastern Time), extended to May 20, 2021 for the U.S. Trustee.

Responses Received:

- A. Informal comments from the U.S. Trustee.
- B. Informal Limited Objection and Comments from the State of Texas taxing entities.
- C. Informal response from the International Fidelity Insurance Company
- D. Objection of Woodforest National Bank to the Disclosure Statement for the Joint Prepackaged Chapter 11 Plan of Reorganization of Secure Home Holdings LLC and its Affiliated Debtors and Debtors in Possession and Objection to the Confirmation of the Joint Prepackaged Chapter 11 Plan of Reorganization of Secure Home Holdings LLC and its Affiliated Debtors and Debtors in Possession, filed on May 18, 2021 [[Docket No. 103](#)].
- E. Objection by the United States to the Adequacy of the Debtors' Disclosure Statement and to the Joint Prepackaged Chapter 11 Plan of Reorganization of Secure Home Holdings, LLC and its Affiliated Debtors and Debtors in Possession, filed on May 18, 2021 [[Docket No. 105](#)].
- F. **Limited Objection of Automotive Rentals, Inc. and ARI Fleet LT to the Terms of Assumption of Executory Contracts or Unexpired Leases and of the Proposed Confirmation Order for the Prepackaged Joint Plan [Docs. No. 18, 19 and 133-1], filed on May 24, 2021 [[Docket No. 151](#)].**

Related Pleadings:

- A. Declaration of Amy V. Kothari in Support of Chapter 11 Petitions and First Day Papers, filed on April 25, 2021 [[Docket No. 5](#)].

- B. Joint Prepackaged Chapter 11 Plan of Reorganization of Secure Home Holdings LLC and its Affiliated Debtors and Debtors in Possession, filed on April 26, 2021 [[Docket No. 18](#)].
- C. Disclosure Statement for the Joint Prepackaged Chapter 11 Plan of Reorganization of Secure Home Holdings LLC and its Affiliated Debtors and Debtors in Possession, filed on April 26, 2021 [[Docket No. 19](#)].
- D. Certification of Jeffrey R. Miller with Respect to the Tabulation of Votes on the Joint Prepackaged Chapter 11 Plan of Reorganization of Secure Home Holdings LLC and its Affiliated Debtors and Debtors in Possession, filed on April 26, 2021 [[Docket No. 39](#)].
- E. 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 Prepetition Solicitation Procedures, (IV) Approving the Combined Hearing Notice, (V) Approving Notice and Objection Procedures for the Assumption of Executory Contracts and Unexpired Leases, (VI) Waiving the Requirement of Filing Schedules, Statements of Financial Affairs, Rule 2015.3 Reports and Section 341 Meeting of Creditors and (VII) Granting Related Relief, entered on April 28, 2021 [[Docket No. 66](#)].
- F. Notice of (I) Commencement of Prepackaged Chapter 11 Bankruptcy Case, (II) Combined Hearing on the Disclosure Statement, Confirmation of the Prepackaged Joint Chapter 11 Plan, and Related Matters, and (III) Objection Deadline, filed on April 28, 2021 [[Docket No. 71](#)].
- G. Affidavit of Publication Re: Notice of (I) Commencement of Prepackaged Chapter 11 Bankruptcy Case, (II) Combined Hearing on the Disclosure Statement, Confirmation of the Prepackaged Joint Chapter 11 Plan, and Related Matters, and (III) Objection Deadline, filed on April 30, 2021 [[Docket No. 73](#)].
- H. Certificate of Service, filed on April 30, 2021 [[Docket No. 74](#)].
- I. Certificate of Service, filed on May 1, 2021 [[Docket No. 75](#)].
- J. Supplemental Certificate of Service, filed on May 3, 2021 [[Docket No. 76](#)].
- K. Notice of Filing of Plan Supplement with Respect to the Joint Prepackaged Chapter 11 Plan of Reorganization of Secure Home Holdings LLC and its Affiliated Debtors and Debtors in Possession, filed on May 11, 2021 [[Docket No. 89](#)].
- L. Supplemental Certificate of Service, filed on May 14, 2021 [[Docket No. 96](#)].
- M. **Certification of Counsel Regarding Order Approving Stipulation By and Between the Debtors and Genecov DMLT, Ltd., filed on May 21, 2021 [[Docket No. 121](#)]**

- N. **Declaration of Keshav Lall in Support of Confirmation of the Modified Joint Prepackaged Chapter 11 Plan of Reorganization of Secure Home Holdings LLC and its Affiliated Debtors and Debtors in Possession, filed on May 21, 2021 [[Docket No. 125](#)].**
- O. **Declaration of Geoffrey Richards in Support of Confirmation of the Modified Joint Prepackaged Chapter 11 Plan of Reorganization of Secure Home Holdings LLC and its Affiliated Debtors and Debtors in Possession, filed on May 21, 2021 [[Docket No. 126](#)].**
- P. **Memorandum of Law in Support of Entry of an Order (I) Approving the Adequacy of the Disclosure Statement and (II) Confirming the Modified Joint Prepackaged Chapter 11 Plan of Reorganization of Secure Home Holdings LLC and its Affiliated Debtors and Debtors in Possession Pursuant to Chapter 11 of the Bankruptcy Code, filed on May 21, 2021 [[Docket No. 130](#)].**
- Q. **Statement of the DIP Agents and Prepetition First Lien Co-Agents in Support of Confirmation of the Debtors' Prepackaged Chapter 11 Plan, filed on May 21, 2021 [[Docket No. 131](#)].**
- R. **Notice of Filing of Modified Joint Prepackaged Chapter 11 Plan of Reorganization of Secure Home Holdings LLC and its Affiliated Debtors and Debtors in Possession, filed on May 23, 2021 [[Docket No. 132](#)].**
- S. **Notice of Proposed Filing of Findings of Fact, Conclusions of Law, and Order (I) Approving the Adequacy of the Disclosure Statement and (II) Confirming the Modified Joint Prepackaged Chapter 11 Plan of Reorganization of Secure Home Holdings LLC and its Affiliated Debtors and Debtors in Possession, filed on May 23, 2021 [[Docket No. 133](#)].**
- T. **[UNDER SEAL] Certificate of Service of Cure Notices, filed on May 24, 2021 [[Docket 145](#)].**
- U. **Motion for Entry of an Order Authorizing the Filing Under Seal of the Certificate of Service of Cure Notices, filed on May 24, 2021 [[Docket No. 146](#)].**
- V. **Notice of Filing of Proposed Redacted Version of the Certificate of Service of Cure Notices, filed on May 24, 2021 [[Docket No. 148](#)].**

Status: The Debtors are working to resolve the above objections. This matter will go forward.

- 13. Debtors' Application for Entry of an Order Authorizing the Employment and Retention of Skadden, Arps, Slate, Meagher & Flom LLP as Special Counsel to the Debtors Effective as of the Petition Date, filed on May 4, 2021 [[Docket No. 80](#)].

Objection Deadline: May 18, 2021 at 4:00 p.m. (*prevailing* Eastern Time). Extended to May 20, 2021 for the U.S. Trustee.

Responses Received:

- A. Informal comments of the U.S. Trustee.

Related Pleadings:

- A. **Supplemental Declaration of Van C. Durrer, II in Support of the Debtors' Application for Entry of an Order Authorizing the Employment and Retention of Skadden, Arps, Slate, Meagher & Flom LLP as Special Counsel to the Debtors Effective as of the Petition Date (the "Supplemental Declaration), filed on May 21, 2021 [[Docket No. 123](#)].**
- B. **Certification of Counsel Regarding Debtors' Application for Entry of an Order Authorizing the Employment and Retention of Skadden, Arps, Slate, Meagher & Flom LLP as Special Counsel to the Debtors Effective as of the Petition Date, filed on May 21, 2021 [[Docket No. 124](#)].**
- C. **Order Authorizing the Employment and Retention of Skadden, Arps, Slate, Meagher & Flom LLP as Special Counsel to the Debtors Effective as of the Petition Date, entered on May 24, 2021 [[Docket No. 153](#)].**

Status: The order has been entered.

III. ADDITIONAL MATTER GOING FORWARD:

14. **Debtors' Emergency Motion for Order Authorizing Procedures for and Rule 2004 Examination of Eino Hill, Consolidated Security Industries Inc. a/k/a CSI, and Al Radi, a/k/a Al Radilaleh, filed on May 21, 2021 [[Docket No. 127](#)].**

Objection Deadline: May 25, 2021 at 11:30 a.m. (*prevailing* Eastern Time).

Responses Received: None.

Related Pleadings:

- A. **Declaration of Amy Kothari in Support of Debtors' Emergency Motion for Order Authorizing Procedures for and Rule 2004 Examination of Eino Hill, Consolidated Security Industries Inc. a/k/a CSI, and Al Radi, a/k/a Al Radilaleh, filed on May 21, 2021 [[Docket No. 128](#)].**
- B. **Motion of the Debtors for Expedited *Ex Parte* Consideration of the Debtors' Emergency Motion for Order Authorizing Procedures for and Rule 2004 Examination of Eino Hill, Consolidated Security Industries Inc. a/k/a CSI, and Al Radi, a/k/a Al Radilaleh, filed on May 21, 2021 [[Docket No. 129](#)].**
- C. **Order Authorizing Expedited *Ex Parte* Consideration of the Debtors' Emergency Motion for Order Authorizing Procedures for and Rule 2004**

Examination of Eino Hill, Consolidated Security Industries Inc. a/k/a CSI, and Al Radi, a/k/a Al Radilaleh, entered on May 24, 2021 [[Docket No. 144](#)].

- D. Notice of Debtors' Emergency Motion for Order Authorizing Procedures for and Rule 2004 Examination of Eino Hill, Consolidated Security Industries Inc. a/k/a CSI, and Al Radi, a/k/a Al Radilaleh, filed on May 24, 2021 [[Docket No. 149](#)].

Status: This matter will go forward.

DEBTORS' POTENTIAL WITNESSES:

- (a) Amy V. Kothari, Debtors' Chief Executive Officer
- (b) Mohsin Meghji, Managing Partner of M3 Advisory Partners, LP
- (c) Keshav Lall, Managing Director of M3 Advisory Partners, LP
- (d) Geoffrey Richards, Managing Director of Raymond James & Associates, Inc.
- (e) Jeffrey R. Miller, Managing Director-Corporate Restructuring of KCC
- (f) Any witness designated by any other party.

Dated: May 24, 2021
Wilmington, Delaware

CHIPMAN BROWN CICERO & COLE, LLP

/s/ Mark D. Olivere

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