

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

In re:)	
)	Chapter 11
FOREVER 21, INC., <i>et al.</i> , ¹)	Case No. 19-12122 (KG)
)	
Debtors.)	(Jointly Administered)
)	

**SECOND AMENDED² NOTICE OF AGENDA ON MATTERS
SCHEDULED FOR HEARING ON OCTOBER 28, 2019,
AT 2:00 P.M. (PREVAILING EASTERN TIME) BEFORE THE
HONORABLE KEVIN GROSS, AT THE UNITED STATES
BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET
STREET, 6TH FLOOR, COURTROOM NO. 3, WILMINGTON, DELAWARE 19801³**

PLEASE TAKE NOTICE, AS THERE ARE NO MATTERS GOING FORWARD, THE COURT HAS CANCELED THIS HEARING.

I. RESOLVED MATTERS

1. **Insurance Motion.** *Debtors’ Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Their Obligations Under Insurance Policies Entered into Prepetition, (B) Continue to Pay Brokerage Fees, (C) Renew, Supplement, Modify, or Purchase Insurance Coverage, (D) Continue to Pay Workers’ Compensation Coverage Fees, (E) Maintain the Surety Bonds, and (F) Honor the Terms of the Financing Agreement and Pay Premiums Thereunder and (II) Granting Related Relief* [Filed: 9/30/19] (Docket No. 20)

Response/Objection Deadline: October 21, 2019, at 4:00 p.m. (ET). Extended to October 24, 2019, at 4:00 p.m. (ET) for the Creditors’ Committee.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, include: Forever 21, Inc. (4795); Alameda Holdings, LLC (2379); Forever 21 International Holdings, Inc. (4904); Forever 21 Logistics, LLC (1956); Forever 21 Real Estate Holdings, LLC (4224); Forever 21 Retail, Inc. (7150); Innovative Brand Partners, LLC (7248); and Riley Rose, LLC (6928). The location of the Debtors’ service address is: 3880 N. Mission Road, Los Angeles, California 90031.

² Amended items noted in bold.

³ Any party who wishes to attend telephonically is required to make arrangements through CourtCall by telephone (888-882-6878) or by facsimile (310-743-1850).

Responses/Objections Received: Informal comments from Chubb and the Creditors' Committee.

Related Documents:

- i. Interim Order (I) Authorizing the Debtors to (A) Pay Their Obligations Under Insurance Policies Entered into Prepetition, (B) Continue to Pay Brokerage Fees, (C) Renew, Supplement, Modify, or Purchase Insurance Coverage, (D) Continue to Pay Workers' Compensation Coverage Fees, (E) Maintain the Surety Bonds, and (F) Honor the Terms of the Financing Agreement and Pay Premiums Thereunder and (II) Granting Related Relief [Filed: 10/1/19] (Docket No. 111)
- ii. Notice of Entry of Interim Order and Final Hearing Regarding Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Their Obligations Under Insurance Policies Entered into Prepetition, (B) Continue to Pay Brokerage Fees, (C) Renew, Supplement, Modify, or Purchase Insurance Coverage, (D) Continue to Pay Workers' Compensation Coverage Fees, (E) Maintain the Surety Bonds, and (F) Honor the Terms of the Financing Agreement and Pay Premiums Thereunder and (II) Granting Related Relief [Filed: 10/3/19] (Docket No. 149)
- iii. Certification of Counsel Regarding Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Their Obligations Under Insurance Policies Entered into Prepetition, (B) Continue to Pay Brokerage Fees, (C) Renew, Supplement, Modify, or Purchase Insurance Coverage, (D) Continue to Pay Workers' Compensation Coverage Fees, (E) Maintain the Surety Bonds, and (F) Honor the Terms of the Financing Agreement and Pay Premiums Thereunder and (II) Granting Related Relief [Filed: 10/23/19] (Docket No. 280)
- iv. [Signed] Final Order (I) Authorizing the Debtors to (A) Pay Their Obligations Under Insurance Policies Entered into Prepetition, (B) Continue to Pay Brokerage Fees, (C) Renew, Supplement, Modify, or Purchase Insurance Coverage, (D) Continue to Pay Workers' Compensation Coverage Fees, (E) Maintain the Surety Bonds, and (F) Honor the Terms of the Financing Agreement and Pay Premiums Thereunder and (II) Granting Related Relief [Filed: 10/24/19] (Docket No. 284)

Status: The order has been entered. No hearing is necessary.

2. **Sell Down Motion.** *Debtors' Motion Seeking Entry of an Order Establishing a Record Date for Notice and Sell-Down Procedures for Trading in Certain Claims Against the Debtors' Estates* [Filed: 9/30/19] (Docket No. 16)

Response/Objection Deadline: October 21, 2019, at 4:00 p.m. (ET). Extended to October 24, 2019, at 4:00 p.m. (ET) for the Creditors' Committee.

Responses/Objections Received: Informal comments from the United States Trustee.

Related Documents:

- i. Notice of Filing of Revised Proposed Order Establishing a Record Date for Notice and Sell-Down Procedures For Trading In Certain Claims Against the Debtors' Estates [Filed: 10/3/19] (Docket No. 163)
- ii. Notice of Hearing on Debtors' Motion Seeking Entry of an Order Establishing a Record Date for Notice and Sell-Down Procedures for Trading in Certain Claims Against the Debtors' Estates [Filed: 10/3/19] (Docket No. 164)
- iii. Certification of Counsel Regarding Debtors' Motion Seeking Entry of an Order Establishing a Record Date for Notice and Sell-Down Procedures for Trading in Certain Claims Against the Debtors' Estates [Filed: 10/23/19] (Docket No. 281)
- iv. [Signed] Order Establishing a Record Date for Notice and Sell-Down Procedures For Trading In Certain Claims Against the Debtors' Estates [Filed: 10/24/19] (Docket No. 285)

Status: The order has been entered. No hearing is necessary.

II. CONTINUED MATTERS

3. **Motion for Relief from Stay.** *Rectenwald Brothers Construction Inc.'s Motion for Order to (I) Compel Assumption or Rejection of General Contract and (II) to Terminate, Annul, or Modify the Automatic Stay to (A) File Construction Lien and, in the Alternative to Compelling Assumption or Rejection, (B) Terminate the General Contract* [Filed: 10/11/19] (Docket No. 192)

Response/Objection Deadline: October 21, 2019, at 4:00 p.m. (ET). Extended to October 24, 2019, at 4:00 p.m. (ET) for the Debtors.

Responses/Objections Received: None.

Related Documents: None.

Status: Pursuant to an agreement between the Debtors and counsel for the movant, the hearing on this matter has been continued to October 31, 2019, at 11:00 a.m. (ET).

4. **Bar Date Motion.** *Debtors' Motion Seeking Entry of An Order (I) Setting Bar Dates for Filing Proofs Of Claim, Including Requests for Payment Under Section 503(B)(9), (II) Setting a Bar Date for the Filing of Proofs of Claim by Governmental Units, (III) Establishing Amended Schedules Bar Date and Rejection Damages Bar Date, (IV) Approving the Form of and Manner for Filing Proofs of Claim, (V) Approving Notice of Bar Dates, and (VI) Granting Related Relief* [Filed: 10/14/19] (Docket No. 200)

Response/Objection Deadline: October 21, 2019, at 4:00 p.m. (ET). Extended to October 23, 2019, at 4:00 p.m. (ET) for the United States Trustee and to October 30, 2019, at 4:00 p.m. (ET) for the official committee of unsecured creditors [Docket No. 197] (the "Creditors' Committee").

Responses/Objections Received: Informal comments from the United States Trustee and various landlords

Related Documents: None.

Status: The hearing on this matter has been continued to November 5, 2019, at **1:00 p.m.** (ET).

5. **DIP Financing Motion** *Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition ABL Secured Parties, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief* [Filed: 9/30/19] (Docket No. 24)

Response/Objection Deadline: October 21, 2019, at 4:00 p.m. (ET). Extended to October 23, 2019, at 4:00 p.m. (ET) for RGIS Inventory Specialists ("RGIS") and to October 30, 2019, at 7:00 p.m. (ET) for the Creditors' Committee.

Responses/Objections Received:

- i. Informal comments from Chubb, RGIS, the United States Trustee, the Creditors' Committee, certain landlords, and certain Texas Taxing Authorities
- ii. The Texas Taxing Authorities' Objection to the Interim Order (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition ABL Secured Parties, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed: 10/7/19] (Docket No. 173)

- iii. Limited Objection of Brooks Shopping Centers, LLC, Pyramid Management Group, LLC, and Westfield, LLC to the Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition ABL Secured Parties, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed: 10/18/19] (Docket No. 226)
- iv. Objection to Interim Order (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition ABL Secured Parties, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed: 10/18/19] (Docket No. 231)
- v. Joinder of Taubman Landlords to Limited Objection of Brooks Shopping Centers, LLC, Pyramid Management Group, LLC, and Westfield, LLC to the Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition ABL Secured Parties, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed: 10/21/19] (Docket No. 247)
- vi. Comenity Capital Bank's Limited Objection and Reservation of Rights with Respect to Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition ABL Secured Parties, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed: 10/21/19] (Docket No. 252)
- vii. Limited Objection of Acadia Realty Limited Partnership, Centennial Real Estate Company, LLC, Centercal Properties, LLC, CRVI SBP LLC, Dimond Center Holdings LLC, Federal Realty Investment Trust, Galleria Mall Investors LP, GS Pacific ER LLC, Ingram North Loop Shopping Center, L.P., KRE Broadway Mall Owner LLC, Memorial City Mall LP, Metropolis Lifestyle Center, LLC, Montebello Town Center Investors, LLC PGIM Real Estate, Retail Properties of America, Inc., Starwood Retail Partners LLC, the Forbes Company, the Macerich Company, Trademark

Property Company, UBS Realty Investors LLC, Urban Edge Properties, White Plains Galleria Limited Partnership, and YTC Mall Owner, LLC to Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition ABL Secured Parties, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed: 10/21/19] (Docket No. 254)

- viii. Limited Objection and Joinder of CAPREF Lloyd II LLC, CAPREF Burbank LLC, and CAPREF Strand LLC to the Limited Objection of Brooks Shopping Centers, LLC, Pyramid Management Group, LLC, and Westfield, LLC to the Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition ABL Secured Parties, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed: 10/21/19] (Docket No. 255)
- ix. Limited Objection and Joinder of Stockton Street Properties, Inc. the Limited Objection of Brooks Shopping Centers, LLC, Pyramid Management Group, LLC, and Westfield, LLC to the Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition ABL Secured Parties, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed: 10/21/19] (Docket No. 256)
- x. Limited Objection and Joinder of Prep Hillside Real Estate LLC to the Limited Objection of Brooks Shopping Centers, LLC, Pyramid Management Group, LLC, and Westfield, LLC to the Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition ABL Secured Parties, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed: 10/21/19] (Docket No. 257)
- xi. Joinder of Macomb Center Partners, LLC Vestar DRM-OPCO, LLC Vestar CPT Tempe Marketplace, LLC and CPT Riverside Plaza, LLC to the Limited Objection of Brooks Shopping Centers, LLC, Pyramid

Management Group, LLC, and Westfield, LLC to the Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition ABL Secured Parties, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed: 10/21/19] (Docket No. 260)

- xii. Joinder of CBL & Associates Management, Inc. to the Limited Objection of Brooks Shopping Centers, LLC, Pyramid Management Group, LLC, and Westfield, LLC to the Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition ABL Secured Parties, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed: 10/22/19] (Docket No. 274)
- xiii. Joinder of Washington Prime Group Inc. to the Limited Objection of Certain Landlords to Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition ABL Secured Parties, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed 10/25/19] (Docket No. 313)

Related Documents:

- i. Declaration of Jonathan Goulding in Support of the Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition ABL Secured Parties, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed: 9/30/19] (Docket No. 25)
- ii. Declaration of Christian Tempke in Support of the Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition ABL Secured Parties, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed: 9/30/19] (Docket No.

26)

- iii. Notice of Entry of Hearing on Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition ABL Secured Parties, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed: 9/30/19] (Docket No. 52)
- iv. Notice of Filing of Exhibits and Revised Exhibits to Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition ABL Secured Parties, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed: 10/1/19] (Docket No. 83)
- v. Certification of Counsel Regarding Interim Order: (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition ABL Secured Parties, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed: 10/2/19] (Docket No. 131)
- vi. Interim Order (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition ABL Secured Parties, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed: 10/2/19] (Docket No. 133)
- vii. Notice of Entry of Interim Order and Hearing on Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition ABL Secured Parties, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed: 10/3/19] (Docket No. 148)

Status: The hearing on this matter has been continued to November 5, 2019, at 1:00 p.m. (ET).

6. **Creditor Matrix Motion.** *Debtors' Motion Seeking Entry of Interim and Final Orders Authorizing the Debtors' to (I) File a Consolidated List of Creditors in Lieu of Submitting a Separate Mailing Matrix for Each Debtor, (II) File a Consolidated List of the Debtors' Fifty Largest Unsecured Creditors, (III) Redact Certain Personal Identification Information for the Debtors' Employees and European Member Countries' Citizens, and (IV) Granting Related Relief* [Filed: 9/30/19] (Docket No. 8)

Response/Objection Deadline: October 21, 2019, at 4:00 p.m. (ET). Extended to October 24, 2019, at 7:00 p.m. (ET) for the Creditors' Committee and to November 19, 2019, at 4:00 p.m. (ET) for the United States Trustee.

Responses/Objections Received: None.

Related Documents:

- i. Interim Order Authorizing the Debtors' to (I) File a Consolidated List of Creditors in Lieu of Submitting a Separate Mailing Matrix for Each Debtor, (II) File a Consolidated List of the Debtors' Fifty Largest Unsecured Creditors, (III) Redact Certain Personal Identification Information for the Debtors' Employees and European Member Countries' Citizens, and (IV) Granting Related Relief [Filed: 10/1/19] (Docket No. 100)
- ii. Notice of Entry of Interim Order and Final Hearing on Debtors' Motion Seeking Entry of Interim and Final Orders Authorizing the Debtors' to (I) File a Consolidated List of Creditors in Lieu of Submitting a Separate Mailing Matrix for Each Debtor, (II) File a Consolidated List of the Debtors' Fifty Largest Unsecured Creditors, (III) Redact Certain Personal Identification Information for the Debtors' Employees and European Member Countries' Citizens, and (IV) Granting Related Relief [Filed: 10/3/19] (Docket No. 158)

Status: The hearing on this matter has been continued to November 26, 2019, at 10:00 a.m. (ET).

III. MATTERS FILED UNDER CERTIFICATION

7. **Taxes Motion.** *Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Payment of Certain Prepetition Taxes and Fees and (II) Granting Related Relief* [Filed: 9/30/19] (Docket No. 10)

Response/Objection Deadline: October 21, 2019, at 4:00 p.m. (ET). Extended to October 23, 2019, at 4:00 p.m. (ET) for the United States Trustee and to October 24, 2019, at 7:00 p.m. (ET) for the Creditors' Committee.

Responses/Objections Received: Informal comments from the Creditors'

Committee.

Related Documents:

- i. Interim Order (I) Authorizing the Payment of Certain Prepetition Taxes and Fees and (II) Granting Related Relief [Filed: 10/1/19] (Docket No. 109)
- ii. Notice of Entry of Interim Order and Final Hearing Regarding Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Payment of Certain Prepetition Taxes and Fees and (II) Granting Related Relief [Filed: 10/3/19] (Docket No. 159)
- iii. Certification of Counsel Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Payment of Certain Prepetition Taxes and Fees and (II) Granting Related Relief [Filed: 10/24/10] (Docket No. 293)
- iv. **[Signed] Final Order (I) Authorizing the Payment of Prepetition Taxes and Fees and (II) Granting Related Relief [Filed: 10/28/19] (Docket No. 338)**

Status: **The order has been entered. No hearing is necessary.**

8. **NOL Motion.** *Debtors' Motion Seeking Entry of Interim and Final Orders (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Common Stock and (II) Granting Related Relief* [Filed: 9/30/19] (Docket No. 9)

Response/Objection Deadline: October 21, 2019, at 4:00 p.m. (ET). Extended to October 24, 2019, at 4:00 p.m. (ET) for the Creditors' Committee.

Responses/Objections Received: Informal comments from the United States Trustee and the Creditors' Committee

Related Documents:

- i. Notice of Hearing on Debtors' Motion Seeking Entry of Interim and Final Orders (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Common Stock and (II) Granting Related Relief [Filed: 10/3/19] (Docket No. 151)
- ii. Certification of Counsel Regarding Debtors' Motion Seeking Entry of Interim and Final Orders (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Common Stock and (II) Granting Related Relief [Filed:

10/23/19] (Docket No. 282)

- iii. [Signed] Final Order (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Common Stock and (II) Granting Related Relief [Filed: 10/24/19] (Docket No. 288)

Status: The order has been entered. No hearing is necessary.

- 9. **Customer Programs Motion.** *Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to Maintain and Administer Their Existing Customer Programs and Honor Certain Prepetition Obligations Related Thereto and (II) Granting Related Relief* [Filed: 9/30/19] (Docket No. 15)

Response/Objection Deadline: October 21, 2019, at 4:00 p.m. (ET). Extended to October 24, 2019, at 7:00 p.m. (ET) for the Creditors' Committee.

Responses/Objections Received: Informal comments from the United States Trustee, Comenity Capital Bank ("Comenity"), and the Creditors' Committee.

Related Documents:

- i. Interim Order (I) Authorizing the Debtors to Maintain and Administer Their Existing Customer Programs and Honor Certain Prepetition Obligations Related Thereto and (II) Granting Related Relief [Filed: 10/1/19] (Docket No. 108)
- ii. Notice of Entry of Interim Order and Final Hearing Regarding Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to Maintain and Administer Their Existing Customer Programs and Honor Certain Prepetition Obligations Related Thereto and (II) Granting Related Relief [Filed: 10/3/19] (Docket No. 147)
- iii. Certification of Counsel Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Maintain and Administer Their Existing Customer Programs and Honor Certain Prepetition Obligations Related Thereto and (II) Granting Related Relief [Filed: 10/24/19] (Docket No. 292)
- iv. **[Signed] Final Order (I) Authorizing the Debtors to Maintain and Administer their Existing Customer Programs and Honor Certain Prepetition Obligations Related Thereto and (II) Granting Related Relief** [Filed: 10/28/19] (Docket No. 328)

Status: The order has been entered. No hearing is necessary.

10. **Lease Rejection Motion.** *Debtors' Omnibus Motion Seeking Entry of an Order (I) Authorizing (A) the Rejection of Certain Unexpired Leases and (B) Abandonment of Certain Personal Property, If Any, Each Effective Nunc Pro Tunc to the Petition Date and (II) Granting Related Relief* [Filed: 9/30/19] (Docket No. 22)

Response/Objection Deadline: October 21, 2019, at 4:00 p.m. (ET). Extended to October 23, 2019, at 4:00 p.m. (ET) for the United States Trustee and to October 24, 2019, at 4:00 p.m. (ET) for the Creditors' Committee.

Responses/Objections Received:

- i. Informal comments from the United States Trustee, the Creditors' Committee, and Brookfield Properties

Related Documents:

- i. Notice of Hearing on Debtors' Omnibus Motion Seeking Entry of an Order (I) Authorizing (A) the Rejection of Certain Unexpired Leases and (B) Abandonment of Certain Personal Property, If Any, Each Effective *Nunc Pro Tunc* to the Petition Date and (II) Granting Related Relief [Filed: 10/3/19] (Docket No. 153)
- ii. Certification of Counsel Regarding Debtors' Motion Seeking Entry of An Order (I) Authorizing (A) the Rejection of Certain Unexpired Leases and (B) Abandonment of Certain Personal Property, If Any, Each Effective *Nunc Pro Tunc* to the Petition Date and (II) Granting Related Relief [Filed: 10/24/19] (Docket No. 291)
- iii. **[Signed] Order Authorizing (A) the Rejection of Certain Unexpired Leases and (B) the Abandonment of Certain Personal Property, if any, Each Effective Nunc Pro Tunc to the Petition Date and (II) Granting Related Relief** [Filed: 10/28/19] (Docket No. 329)

Status: **The order has been entered. No hearing is necessary.**

IV. MATTERS GOING FORWARD

11. **365(d)(4) Extension Motion.** *Debtors' Motion Seeking Entry of an Order (I) Extending the Deadline by Which the Debtors Must Assume or Reject Unexpired Leases of Nonresidential Property and (II) Granting Related Relief* [Filed: 10/11/19] (Docket No. 195)

Response/Objection Deadline: October 21, 2019, at 4:00 p.m. (ET). Extended to October 23, 2019, at 4:00 p.m. (ET) for the United States Trustee and to October 24, 2019, at 7:00 p.m. (ET) for the Creditors' Committee.

Responses/Objections Received:

- i. Informal comments from the United States Trustee
- ii. Limited Objection to Debtors' (A) Motion Seeking Entry of an Order (I) Authorizing the Debtors; to Enter into the Consulting Agreement, (II) Approving Procedures for Store Closing Sales, and (III) Granting Related Relief and (B) Motion Seeking Entry of an Order (I) Extending the Deadline by which the Debtors Must Assume or Reject Unexpired Leases of Nonresidential Real Property and (II) Granting Related Relief [Filed: 10/21/19] (Docket No. 250)
- iii. Objection of Dania Live 1748 II LLC to Debtors' Motion Seeking Entry of an Order (I) Extending the Deadline by Which the Debtors Must Assume or Reject Unexpired Leases of Nonresidential Real Property and (II) Granting Related Relief [Filed: 10/21/19] (Docket No. 262)

Related Documents:

- i. Certification of Counsel Regarding Debtors' Motion Seeking Entry of an Order (I) Extending the Deadline by Which the Debtors Must Assume or Reject Unexpired Leases of Nonresidential Real Property and (II) Granting Related Relief [Filed: 10/25/19] (Docket No. 317)
- ii. **[Signed] Order Approving Motion (I) Extending the Deadline by which the Debtors Must Assume or Reject Unexpired Leases of Nonresidential Real Property and (II) Granting Related Relief [Filed: 10/28/19] (Docket No. 330)**

Status: **The order has been entered. No hearing is necessary.**

12. **Schedules Extension Motion.** *Debtors' Motion Seeking Entry of an Order (I) Extending Time to File Schedules of Assets and Liabilities, Schedules of Current Income and Expenditures, Schedules of Executory Contracts and Unexpired Leases, and Statements of Financial Affairs and (II) Granting Related Relief* [Filed: 9/29/19] (Docket No. 4)

Response/Objection Deadline: October 21, 2019, at 4:00 p.m. (ET). Extended to October 24, 2019, at 7:00 p.m. (ET) for the Creditors' Committee.

Responses/Objections Received: Informal comments from the United States Trustee.

Related Documents:

- i. Notice of Hearing on Debtors' Motion Seeking Entry of an Order (I)

Extending Time to File Schedules of Assets and Liabilities, Schedules of Current Income and Expenditures, Schedules of Executory Contracts and Unexpired Leases, and Statements of Financial Affairs and (II) Granting Related Relief [Filed: 10/3/19] (Docket No. 157)

- ii. Certification of Counsel Regarding Debtors' Motion Seeking Entry of an Order (I) Extending Time To File Schedules of Assets and Liabilities, Schedules of Current Income and Expenditures, Schedules of Executory Contracts and Unexpired Leases, and Statements of Financial Affairs and (II) Granting Related Relief [Filed: 10/25/19] (Docket No. 309)
- iii. **[Signed] Order Approving Motion (I) Extending Time to File Schedules of Assets and Liabilities, Schedules of Current Income and Expenditures, Schedules of Executory Contracts and Unexpired Leases, and Statements of Financial Affairs and (II) Granting Related Relief To Extend Deadline to File Schedules or Provide Required Information [Filed: 10/28/19] (Docket No. 331)**

Status: **The order has been entered. No hearing is necessary.**

- 13. **Critical Vendors Motion.** *Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Prepetition Claims of (A) Critical Vendors, (B) Foreign Vendors, and (C) 503(b)(9) Claimants and (II) Granting Related Relief* [Filed: 9/30/19] (Docket No. 17)

Response/Objection Deadline: October 21, 2019, at 4:00 p.m. (ET). Extended to October 22, 2019, at 5:00 p.m. (ET) for the United States Trustee and October 24, 2019, at 7:00 p.m. (ET) for the Creditors' Committee.

Responses/Objections Received: Informal comments from the United States Trustee and the Creditors' Committee.

Related Documents:

- i. Declaration of Jonathan Goulding, Chief Restructuring Officer of Forever 21, Inc., in Support of the Debtors' Motions Seeking Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Claims of Critical Vendors, Foreign Vendors, 503(b)(9) Claimants, Import Claimants, and (II) Granting Related Relief [Filed: 9/30/19] (Docket No. 18)
- ii. Interim Order (I) Authorizing the Debtors to Pay Prepetition Claims of (A) Critical Vendors, (B) Foreign Vendors, and (C) 503(b)(9) Claimants and (II) Granting Related Relief [Filed: 10/1/19] (Docket No. 103)
- iii. Notice of Entry of Interim Order and Final Hearing Regarding Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Prepetition Claims of (A) Critical Vendors, (B) Foreign

Vendors, and (C) 503(b)(9) Claimants and (II) Granting Related Relief [Filed: 10/3/19] (Docket No. 146)

- iv. Supplemental Declaration of Jonathan Goulding, Chief Restructuring Officer of Forever 21, Inc., in Support of the Debtors' Motions Seeking Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Claims of Critical Vendors, Foreign Vendors, 503(b)(9) Claimants, Import Claimants, and (II) Granting Related Relief [Filed: 10/25/19] (Docket No. 319)
- v. **Certification of Counsel Regarding Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Prepetition Claims of (A) Critical Vendors, (B) Foreign Vendors, and (C) 503(b)(9) Claimants and (II) Granting Related Relief [Filed: 10/27/19] (Docket No. 322)**
- vi. **[Signed] Final Order (I) Authorizing the Debtors to Pay Prepetition Claims of (A) Critical Vendors, (B) Foreign Vendors, and (C) 503(b)(9) Claimants and (II) Granting Related Relief [Filed: 10/28/19] (Docket No. 332)**

Status: The order has been entered. No hearing is necessary.

- 14. **Lien Claimants Motion.** *Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Prepetition Claims of (A) Lien Claimants and (B) Import Claimants, and (II) Granting Related Relief [Filed: 9/30/19] (Docket No. 19)*

Response/Objection Deadline: October 21, 2019, at 4:00 p.m. (ET). Extended to October 24, 2019, at 7:00 p.m. (ET) for the Creditors' Committee.

Responses/Objections Received: Informal comments from the Creditors' Committee.

Related Documents:

- i. Declaration of Jonathan Goulding, Chief Restructuring Officer of Forever 21, Inc., in Support of the Debtors' Motions Seeking Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Claims of Critical Vendors, Foreign Vendors, 503(b)(9) Claimants, Lien Claimants, Import Claimants, and (II) Granting Related Relief [Filed: 9/30/19] (Docket No. 18)
- ii. Interim Order (I) Authorizing the Debtors to Pay Prepetition Claims of (A) Lien Claimants and (B) Import Claimants, and (II) Granting Related Relief [Filed: 10/1/19] (Docket No. 105)

- iii. Notice of Entry of Interim Order and Final Hearing Regarding Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Prepetition Claims of (A) Lien Claimants and (B) Import Claimants, and (II) Granting Related Relief [Filed: 10/3/19] (Docket No. 150)
- iv. Certification of Counsel Regarding Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Prepetition Claims of (A) Lien Claimants and (B) Import Claimants, and (II) Granting Related Relief [Filed: 10/25/19] (Docket No. 310)
- v. **[Signed] Final Order Approving Debtors Motion (I) Authorizing the Debtors to Pay Prepetition Claims of (A) Lien Claimants and (B) Import Claimants, and (II) Granting Related Relief [Filed: 10/28/19] (Docket No. 333)**

Status: **The order has been entered. No hearing is necessary.**

15. **Cash Management Motion.** *Debtors' Motion Seeking 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 to Perform Intercompany Transactions, and (II) Granting Related Relief* [Filed: 9/30/19] (Docket No. 13)

Response/Objection Deadline: October 21, 2019, at 4:00 p.m. (ET). Extended to October 24, 2019, at 7:00 p.m. (ET) for the Creditors' Committee.

Responses/Objections Received: Informal comments from the United States Trustee and the Creditors' Committee.

Related Documents:

- i. Declaration of Jonathan Goulding, Chief Restructuring Officer of Forever 21, Inc. in Support of the Debtors' Motion Seeking 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 to Perform Intercompany Transactions, and (II) Granting Related Relief [Filed: 9/30/19] (Docket No. 14)
- 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) Continue to Perform Intercompany Transactions and (II) Granting Related Relief [Filed: 10/1/19] (Docket No. 102)
- iii. Notice of Entry of Interim Order and Final Hearing Regarding Debtors'

Motion Seeking 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 to Perform Intercompany Transactions, (II) Granting Administrative Expense Status to Postpetition Intercompany Balances, and (III) Granting Related Relief [Filed: 10/3/19] (Docket No. 145)

- iv. Certification of Counsel Regarding Debtors' Motion Seeking 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 to Perform Intercompany Transactions and (II) Granting Related Relief [Filed: 10/25/19] (Docket No. 318)
- v. **[Signed] 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) Continue to Perform Intercompany Transactions, and (II) Granting Related Relief [Filed: 10/28/19] (Docket No. 334)**

Status: **The order has been entered. No hearing is necessary.**

16. **Utilities Motion Debtors' Motion Seeking Entry of Interim and Final Orders (I) Determining Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Providers From Altering, Refusing, or Discontinuing Utility Services, (III) Establishing Procedures for Determining Adequate Assurance of Payment, (IV) Authorizing Certain Fee Payments for Services Performed, (V) Requiring Utility Providers to Return Deposits for Utility Services No Longer in Use, and (VI) Granting Related Relief [Filed: 9/29/19] (Docket No. 7)**

Response/Objection Deadline: October 21, 2019, at 4:00 p.m. (ET). Extended to October 24, 2019, at 7:00 p.m. (ET) for the Creditors' Committee.

Responses/Objections Received:

- i. Informal comments from the United States Trustee and the Creditors' Committee
- ii. Objection of Certain Utility Companies to the Debtors' Motion Seeking Entry of Interim and Final Orders (I) Determining Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Providers From Altering, Refusing, or Discontinuing Utility Services, (III) Establishing Procedures for Determining Adequate Assurance of Payment, (IV) Authorizing Certain Fee Payments for Services Performed,

(V) Requiring Utility Providers to Return Deposits for Utility Services No Longer in Use, and (VI) Granting Related Relief [Filed: 10/15/19] (Docket No. 204)

a. Notice of Withdrawal of Objection of Certain Utility Companies To the Debtors' Motion Seeking Entry of Interim and Final Orders (I) Determining Adequate Assurance of Payment For Future Utility Services, (II) Prohibiting Utility Providers From Altering, Refusing, or Discontinuing Utility Services, (III) Establishing Procedures For Determining Adequate Assurance of Payment, (IV) Authorizing Certain Fee Payments For Services Performed, (V) Requiring Utility Providers To Return Deposits For Utility Services No Longer In Use, and (VI) Granting Related Relief [Filed 10/24/19] (Docket No. 299)

Related Documents:

- i. Interim Order (I) Determining Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Providers From Altering, Refusing, or Discontinuing Utility Services, (III) Establishing Procedures for Determining Adequate Assurance of Payment, (IV) Authorizing Certain Fee Payments to Certain Services Providers, and (V) Granting Related Relief [Filed: 10/1/19] (Docket No. 110)
- ii. Notice of Entry of Interim Order and Final Hearing Regarding Debtors' Motion Seeking Entry of Interim and Final Orders (I) Determining Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Providers From Altering, Refusing, or Discontinuing Utility Services, (III) Establishing Procedures for Determining Adequate Assurance of Payment, (IV) Authorizing Certain Fee Payments for Services Performed, (V) Requiring Utility Providers to Return Deposits for Utility Services No Longer in Use, and (VI) Granting Related Relief [Filed: 10/3/19] (Docket No. 156)
- iii. Certification of Counsel Regarding Debtors' Motion Seeking Entry of Interim and Final Orders (I) Determining Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Services, (III) Establishing Procedures for Determining Adequate Assurance of Payment, (IV) Authorizing Certain Fee Payments for Services Performed, (V) Requiring Utility Providers to Return Deposits for Utility Services No Longer in Use, and (IV) Granting Related Relief [Filed 10/25/19] (Docket No. 308)
- iv. **[Signed] Final Order Approving Motion (I) Determining Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Services, (III) Establishing Procedures for Determining Adequate Assurance of Payment, (IV) Authorizing Certain Fee Payments to**

Certain Service Providers, and (V) Granting Related Relief [Filed: 10/28/19] (Docket No. 335)

Status: **The order has been entered. No hearing is necessary.**

17. **Wages Motion.** *Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses and (B) Continue Employee Benefits Programs and (II) Granting Related Relief [Filed: 9/30/19] (Docket No. 11)*

Response/Objection Deadline: October 21, 2019, at 4:00 p.m. (ET). Extended to October 23, 2019, at 4:00 p.m. (ET) for the United States Trustee and to October 24, 2019, at 7:00 p.m. (ET) for the Creditors' Committee.

Responses/Objections Received: Informal comments from Chubb Insurance Company ("Chubb"), the Creditors' Committee, and the United States Trustee

Related Documents:

- i. Interim Order (I) Authorizing the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses and (B) Continue Employee Benefits Programs and (II) Granting Related Relief [Filed: 10/1/19] (Docket No. 107)
- ii. Notice of Entry of Interim Order and Final Hearing Regarding Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses and (B) Continue Employee Benefits Programs and (II) Granting Related Relief [Filed: 10/3/19] (Docket No. 160)
- iii. Declaration of Jonathan Goulding in Support of Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses and (B) Continue Employee Benefits Programs and (II) Granting Related Relief [**To Be Filed**]⁴
- iv. **Certification of Counsel Regarding Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses and (B) Continue Employee Benefit Programs and (II) Granting Related Relief [Filed: 10/27/19] (Docket**

⁴ This declaration will be filed at a later date in support of a proposed final form of order.

No. 323)

- v. **[Signed] Second Interim Order (I) Authorizing the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses and (B) Continue Employee Benefits Programs and (II) Granting Related Relief [Filed: 10/28/19] (Docket No. 336)**

Status: The order has been entered. No hearing is necessary.

- 18. **Rejection Procedures Motion.** *Debtors' Motion Seeking Entry of an Order (I) Authorizing and Approving Procedures to Reject, Assume, or Assume and Assign Executory Contracts and Unexpired Leases and (II) Granting Related Relief [Filed: 9/30/19] (Docket No. 21)*

Response/Objection Deadline: October 21, 2019, at 4:00 p.m. (ET). Extended to October 23, 2019, at 4:00 p.m. (ET) for Comenity and the United States Trustee and to October 24, 2019, at 7:00 p.m. (ET) for the Creditors' Committee.

Responses/Objections Received:

- i. Informal comments from the United States Trustee, the Creditors' Committee, CL Investment Group, Gregory Greenfield & Associates, Hines, JLL, QIC Properties US, Inc., Regency Centers, ShopCore Properties, SITE Centers Corp., Turnberry Associates, and Comenity
- ii. Maricopa County Treasurer's Objection to Debtors' Motion Seeking Entry of an Order (I) Authorizing and Approving Procedures to Reject, Assume, or Assume and Assign Executory Contracts and Unexpired Leases and (II) Granting Related Relief [Filed: 10/18/19] (Docket No. 232)
- iii. Limited Objection of Acadia Realty Limited Partnership, Centennial Real Estate Company, LLC, Centercal Properties, LLC, CRVI SBP LLC, Dimond Center Holdings LLC, Federal Realty Investment Trust, Galleria Mall Investors LP, GS Pacific ER LLC, Ingram North Loop Shopping Center, L.P., KRE Broadway Mall Owner LLC, Memorial City Mall LP, Metropolis Lifestyle Center, LLC, Montebello Town Center Investors, LLC, PGIM Real Estate, Retail Properties of America, Inc., Starwood Retail Partners LLC, St Mall Owner LLC, The Forbes Company, The Macerich Company, Trademark Property Company, UBS Realty Investors LLC, Urban Edge Properties, White Plains Galleria Limited Partnership, and YTC Mall Owner, LLC to Debtors' Motion Seeking Entry of an Order (I) Authorizing and Approving Procedures to Reject, Assume, or Assume and Assign Executory Contracts and Unexpired Leases and (II) Granting Related Relief [Filed: 10/21/19] (Docket No. 251)
- iv. Joinder of Macomb Center Partners, LLC Vestar DRM-OPco, LLC Vestar

CPT Tempe Marketplace, LLC and CPT Riverside Plaza, LLC to Limited Objection of Acadia Realty Limited Partnership, Centennial Real Estate Company, LLC Centercal Properties, LLC CRBI SBP, LLC, Dimond Center Holdings LLC, Federal Realty Investment Trust, Galleria Mall Investors LP, GS Pacific ER LLC, Ingram North Loop Shopping Center, L.P., KRE Broadway Mall Owner LLC, Memorial City Mall LP, Metropolis Lifestyle Center, LLC Montebello Town Center Investors, LLC PGIM Real Estate, Retail Properties of America, Inc., Starwood Retail Partners LLC, St Mall Owner LLC, The Forbes Company, The Macerich Company, Trademark Property Company, UBS Realty Investors LLC, Urban Edge Properties, White Plains Galleria Limited Partnership, and YTC Mall Owner, LLC to Debtors' Motion Seeking Entry of an Order (I) Authorizing and Approving Procedures to Reject, Assume or Assume and Assign Executory Contracts and Unexpired Leases and (II) Granting Related Relief [Filed: 10/21/19] (Docket No. 261)

Related Documents:

- i. Notice of Hearing on Debtors' Motion Seeking Entry of an Order (I) Authorizing and Approving Procedures to Reject, Assume, or Assign Executory Contracts and Unexpired Leases and (II) Granting Related Relief [Filed: 10/3/19] (Docket No. 155)
- ii. Certification of Counsel Regarding Debtors' Motion Seeking Entry of an Order (I) Authorizing and Approving Procedures to Reject, Assume, or Assume and Assign Executory Contracts and Unexpired Leases and (II) Granting Related Relief [Filed: 10/25/19] (Docket No. 316)
- iii. **[Signed] Order Approving Motion Authorizing and Approving Procedures to Reject Executory Contracts and Unexpired Leases [Filed: 10/28/19] (Docket No. 337)**

Status: **The order has been entered. No hearing is necessary.**

19. **Interim Compensation Motion.** *Debtors' Motion for Entry of an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and (II) Granting Related Relief* [Filed: 10/14/19] (Docket No. 201)

Response/Objection Deadline: October 21, 2019, at 4:00 p.m. (ET). Extended to October 23, 2019, at 4:00 p.m. (ET) for the United States Trustee and to October 24, 2019, at 7:00 p.m. (ET) for the Creditors' Committee.

Responses/Objections Received: Informal comments from the United States Trustee and the Creditors' Committee.

Related Documents:

- i. Certification of Counsel Regarding Debtors' Motion for Entry of an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and (II) Granting Related Relief [Filed: 10/25/19] (Docket No. 315)
- ii. **[Signed] Order Approving Motion (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief [Filed: 10/28/19] (Docket No. 338)**

Status: **The order has been entered. No hearing is necessary.**

20. **Store Closing Motion.** *Debtors' Motion Seeking Entry of an Order (I) Authorizing the Debtors to Enter into the Consulting Agreement, (II) Approving Procedures for Store Closing Sales, and (III) Granting Related Relief [Filed: 10/1/19] (Docket No. 81)*

Response/Objection Deadline: October 21, 2019, at 4:00 p.m. (ET). Extended to October 23, 2019, at 5:00 p.m. (ET) for the United States Trustee and various landlords and to October 24, 2019, at 7:00 p.m. (ET) for the Creditors' Committee.

Responses/Objections Received:

- i. Informal comments from the Creditors' Committee, the United States Trustee, and various landlords
- ii. Maricopa County Treasurer's Objection to Motion Seeking Entry of an Order (I) Authorizing the Debtors to Enter into the Consulting Agreement, (II) Approving Procedures for Store Closing Sales, and (III) Granting Related Relief [Filed: 10/18/19] (Docket No. 229)
- iii. Objection of Bellevue Square, LLC and Bellevue Square Merchants' Association to Debtors' Motion Seeking Entry of an Order (I) Authorizing the Debtors to Enter into the Consulting Agreement, (II) Approving Procedures for Store Closing Sales, and (III) Granting Related Relief [Filed: 10/21/19] (Docket No. 248)
- iv. Declaration of Alesha Shemwell in Support of Bellevue Square, LLC's and Bellevue Square Merchants' Association's Partial Objection to Debtors' Motion Seeking Entry of an Order (I) Authorizing the Debtors to Enter into the Consulting Agreement, (II) Approving Procedures for Store Closing Sales, and (III) Granting Related Relief [Filed: 10/21/19] (Docket No. 249)
- v. Limited Objection to Debtors' (A) Motion Seeking Entry of an Order (I) Authorizing the Debtors to Enter into the Consulting Agreement, (II) Approving Procedures for Store Closing Sales, and (III) Granting

Related Relief and (B) Motion Seeking Entry of an Order (I) Extending the Deadline by which the Debtors Must Assume or Reject Unexpired Leases of Nonresidential Real Property and (II) Granting Related Relief [Filed: 10/21/19] (Docket No. 250)

- vi. Comenity Capital Bank's Limited Objection and Reservation of Rights With Respect to Debtors' Motion Seeking Entry of an Order (I) Authorizing the Debtors to Enter into the Consulting Agreement, (II) Approving Procedures for Store Closing Sales, and (III) Granting Related Relief [Filed: 10/21/19] (Docket No. 253)

Related Documents:

- i. Declaration of Jonathan Goulding, Chief Restructuring Officer of Forever 21, Inc. in Support of Debtors' Motion Seeking Entry of an Order (I) Authorizing the Debtors to Enter into the Consulting Agreement, (II) Approving Procedures for Store Closing Sales, and (III) Granting Related Relief [Filed: 10/1/19] (Docket No. 82)
- ii. Notice of Hearing on Debtors' Motion Seeking Entry of an Order (I) Authorizing the Debtors to Enter into the Consulting Agreement, (II) Approving Procedures for Store Closing Sales, and (III) Granting Related Relief [Filed: 10/3/19] (Docket No. 162)
- iii. Notice of Supplemental List of Designated Closing Stores Related to Debtors' Motion Seeking Entry of an Order (I) Authorizing the Debtors to Enter into the Consulting Agreement, (II) Approving Procedures for Store Closing Sales, and (III) Granting Related Relief [Filed: 10/10/19] (Docket No. 190)
- iv. Declaration of Sarah Baker in Support of Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Enter into the Consulting Agreement, (II) Approving Procedures for Store Closing Sales, and (III) Granting Related Relief [Filed: 10/21/19] (Docket No. 264)
- v. Declaration of Mackenzie L. Shea in Support of Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Enter into the Consulting Agreement, (II) Approving Procedures for Store Closing Sales, and (III) Granting Related Relief [Filed: 10/21/19] (Docket No. 265)
- vi. **Certification of Counsel Regarding Debtors' Motion Seeking Entry of an Order (I) Authorizing the Debtors to Enter into the Consulting Agreement, (II) Approving Procedures for Store Closing Sales, and (III) Granting Related Relief [Filed: 10/28/19] (Docket No. 327)**
- vii. **[Signed] Order (Approving) (I) Authorizing The Debtors To Enter Into The Consulting Agreement, (II) Approving Procedures For Store Closing Sales, And (III) Granting Related Relief [Filed: 10/28/19]**

(Docket No. 340)

Status: The order has been entered. No hearing is necessary.

Dated: October 28, 2019
Wilmington, Delaware

/s/ James E. O'Neill

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