

**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 (MFW)
)	
Debtors.)	(Jointly Administered)
)	

**AMENDED² NOTICE OF AGENDA ON MATTERS SCHEDULED FOR TELEPHONIC
HEARING ON APRIL 21, 2020, AT 2:00 P.M. (PREVAILING EASTERN TIME)
BEFORE THE HONORABLE MARY F. WALRATH, AT THE UNITED STATES
BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET
STREET, 5TH FLOOR, COURTROOM NO. 4, WILMINGTON, DELAWARE 19801³**

I. CONTESTED MATTERS

1. **F21 OpCo Motion to Modify.** *Motion of F21 OpCo, LLC for Entry of an Order Modifying the Sale Order and Granting Certain Other Relief Relating to Going Out of Business Sales and Store Closings* [Filed: 4/1/20] ([Docket No. 1115](#))

Response/Objection Deadline: April 14, 2020 at 4:00 p.m. (ET). Extended for BRE Fortnite Owner LLC, Westfield, LLC and Walton Foothills Holdings VI, LLC to April 17, 2020 at 12:00 p.m. (ET).

Responses/Objections Received:

- i. Debtors’ Response to Motion of F21 OpCo, LLC for Entry of an Order Modifying the Sale Order and Granting Certain Other Relief Relating to Going Out of Business Sales and Store Closings [Filed: 4/8/20] ([Docket No. 1149](#))

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).

- ii. Objection of Linton Delray, LLC to Motion of F21 OpCo, LLC for Entry of an Order Modifying the Sale Order and Granting Certain Other Relief Relating to Going Out of Business Sales and Store Closings [Filed: 4/10/20] ([Docket No. 1158](#))
- iii. Objection of Donahue Schriber Realty Group, LP to Motion of F21 OpCo, LLC for Entry of an Order Modifying the Sale Order and Granting Certain Other Relief Relating to Going Out of Business Sales and Store Closings [Filed: 4/13/20] ([Docket No. 1162](#))
- iv. Objection of Brooks Shopping Centers, LLC to Motion of F21 OpCo, LLC for Entry of an Order Modifying the Sale Order and Granting Certain Other Relief Relating to Going Out of Business Sales and Store Closings [Filed: 4/14/20] ([Docket No. 1165](#))
- v. Objection to Motion of F21 OpCo, LLC for Entry of an Order Modifying the Sale Order and Granting Certain Other Relief Relating to Going Out of Business Sales and Store Closings and Joinder in Objections of Other Landlords Filed by Town & Country Camelback, LLC [Filed: 4/14/20] ([Docket No. 1169](#))
- vi. Objection of Centennial Real Estate Company, LLC, Centercal Properties, LLC, CRVI SBP LLC, Dimond Center Holdings LLC, Eastview Mall, 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, Majestic Square, LLC, Memorial City Mall LP, 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 Motion of F21 OpCo, LLC For Entry of an Order Modifying the Sale Order and Granting Certain Other Relief Relating to Going Out of Business Sales and Store Closings [Filed: 4/14/20] ([Docket No. 1170](#))
- vii. Joinder of Northwood PL Holdings LLC to Objection to Motion to Modify Sale Order [Filed: 4/14/20] ([Docket No. 1171](#))
- viii. Objection of Vornado to Motion of the Buyer for Modification of the Sale Order [Filed: 4/14/20] ([Docket No. 1172](#))
- ix. Objection of IVT Parke Cedar Park, LLC to F21 OpCo, LLC's Motion for Entry of an Order Modifying the Sale Order and Granting Certain Other Relief Relating to Going Out of Business Sales and Store Closings and Joinder in Other Landlord Objections [Filed: 4/14/20] ([Docket No. 1173](#))
- x. Objection of Macomb Center Partners, LLC and CPT Riverside Plaza, LLC to (I) Fifth Notice of Going Out of Business Sales List Related to the Order (I) Authorizing (A) Entry into and performance Under the asset Purchase Agreement, (B) the Sale of the Debtors' Assets to the Buyer, and (C) the Buyer to Conduct Store Closings and Going Out of Business Sales, and (II)

- Granting Related Relief, *(II)* Ninth Notice of Rejection of Unexpired Non-Residential Real Property Leases, and *(III)* Motion of F21 OpCo, LLC for Entry of an Order Modifying the Sale Order and Granting Certain Other Relief Relating to Going Out of Business Sales and Store Closings and Joinder in Other Landlord Objections [Filed: 4/14/20] ([Docket No. 1174](#))
- xi. The Official Committee of Unsecured Creditors' Response to the Motion of F21 OpCo, LLC for Entry of an Order Modifying the Sale Order and Granting Certain Other Relief Relating to Going Out of Business Sales and Store Closings [Filed: 4/14/20] ([Docket No. 1175](#))
 - xii. Objection of Mann Enterprises, Inc. to Motion of F21 OpCo, LLC for Entry of an Order Modifying the Sale Order and Granting Certain Other Relief Relating to Going Out of Business Sales and Store Closings [Filed: 4/14/20] ([Docket No. 1176](#))
 - xiii. Objection of G&I VII Reno Operating, L.L.C. to (A) Motion of F21 OpCo, LLC for Entry of an Order Modifying the Sale Order and Granting Certain Other Relief Relating to Going Out of Business Sales and Store Closings, and (B) Ninth Notice of Rejection of Unexpired Non-Residential Real Property Leases [Filed: 4/14/20] ([Docket No. 1177](#))
 - xiv. Objection of Riverwalk Market Place and the Shops at Summerlin North LP to the Motion of F21 OpCo, LLC for Entry of an Order Modifying the Sale Order and Granting Certain Other Relief Relating to Going Out of Business Sales and Store Closings [Filed: 4/14/20] ([Docket No. 1178](#))
 - xv. Joinder of PCW Properties, LLC in Objections of Other Landlords in Response to Motion to Modify Sale Order [Filed: 4/14/20] ([Docket No. 1180](#))
 - xvi. Objection of Hines Global REIT, Inc., Jones Lang Lasalle Americas, Inc., PPF RTL Atlantic Town Center, LLC, QIC Properties Us, Inc., Regency Centers, L.P., Shopcore Properties, L.P., Site Centers Corp., Teachers Insurance And Annuity Association, Turnberry Associates, And Weingarten Realty Investors To *(I)* The Motion Of F21 Opco, LLC For Entry Of An Order Modifying The Sale Order And Granting Certain Other Relief Relating To Going Out Of Business Sales And Store Closings, *(II)* The Ninth Rejection Notice, And *(III)* The Omnibus Amended GOB Sale List [Filed: 4/14/20] ([Docket No. 1181](#))
 - xvii. Objection of California Riverside Associates to Motion of the Buyer for Modification of the Same Order [Filed: 4/14/20] ([Docket No. 1183](#))
 - xviii. BRE Fortnight Owner LLC's Objection to Motion of F21 OpCo, LLC for Entry of an Order Modifying the Sale Order and Granting Certain Other Relief Relating to Going Out of Business Sales and Store Closings [Filed: 4/17/20] ([Docket No. 1189](#))
 - xix. Joinder of Westfield, LLC And Affiliates To Objection By Brooks Shopping Centers, LLC To The Motion Of F21 Opco, LLC For Entry Of An Order Modifying The Sale Order And Granting Certain Other Relief

Relating To Going Out Of Business Sales And Store Closings [Filed: 4/17/20] ([Docket No. 1191](#))

Related Documents:

- i. Notice of Motion of F21 OpCo, LLC for Entry of an Order Modifying the Sale Order and Granting Certain Other Relief Relating to Going Out of Business Sales and Store Closings [Filed: 4/3/20] ([Docket No. 1129](#))
- ii. Declaration of Andrew Minear in Support of the Motion of F21 OpCo, LLC for Entry of an Order Modifying the Sale Order and Granting Certain Other Relief Relating to Going Out of Business Sales and Store Closings [Filed: 4/3/20] ([Docket No. 1130](#))
- iii. **Motion of F21 OpCo, LLC for Leave to File an Omnibus Reply in Support of (1) Its Motion for Entry of an Order Modifying the Sale Order and Granting Certain Other Relief Relating to Going out of Business Sales and Store Closings; (2) The Debtors Ninth Notice of Rejection of Unexpired Non-Residential Real Property Leases, (3) The Debtors Fifth Notice of Going out of Business Sales; and (4) the Debtors Omnibus Amended Notice of Going out of Business Sales [Filed: 4/20/20] ([Docket No. 1203](#))**
- iv. **[Signed] Order Granting the Motion of F21 Opco, LLC for Leave to File Omnibus Reply in Support of (I) Its Motion for Entry of an Order Modifying the Sale Order and Granting Certain Other Relief Relating to Going Out of Business Sales and Store Closings; (II) The Debtors' Ninth Notice of Rejection of Unexpired Non-Residential Real Property Leases; (III) The Debtors' Fifth Notice of Going Out of Business Sales; and (IV) The Debtors' Omnibus Amended Notice of Going Out of Business Sales [Filed: 4/20/20] ([Docket No. 1207](#))**

Reply:

- i. **F21 OPCO, LLCs Omnibus Reply in Support of (1) Its Motion for Entry of an Order Modifying the Sale Order and Granting Certain Other Relief Relating to Going out of Business Sales and Store Closings; (2) The Debtors Ninth Notice of Rejection of Unexpired Non-Residential Real Property Leases, (3) The Debtors Fifth Notice of Going out of Business Sales; and (4) the Debtors Omnibus Amended Notice of Going out of Business Sales [Filed: 4/20/20] ([Docket No. 1204](#))**

Status: This matter will be going forward. **The Debtors are informed that F21 has resolved the objections listed at items v, xiv, xv, and xix under “Responses/Objections Received” above. The Debtors are further informed that F21 continues to negotiate with the remaining objecting parties to reach a resolution on the relief requested in the Motion to Modify.**

2. **Fifth GOB Notice.** *Fifth Notice of Going Out of Business Sales List Related to the Order (I) Authorizing (A) Entry Into and Performance Under the Asset Purchase Agreement, (B) the Sale of the Debtors' Assets to the Buyer, and (C) the Buyer to Conduct Store Closings and Going Out of Business Sales, and (II) Granting Related Relief* [Filed: 3/31/20] ([Docket No. 1109](#))

Response/Objection Deadline: N/A

Responses/Objections Received:

- i. Objection of Donahue Schriber Realty Group, LP to (1) Fifth Notice of Going Out of Business Sales List Related to the Order (I) Authorizing (A) Entry Into and Performance Under the Asset Purchase Agreement, (B) the Sale of the Debtors' Assets to the Buyer, and (C) the Buyer to Conduct Store Closings and Going Out of Business Sales, and (II) Granting Related Relief [Filed: 4/7/20] ([Docket No. 1140](#))
- ii. Limited Objection of Azalea Joint Venture, LLC, CRVI SBP LLC, Dimond Center Holdings, LLC, Ingram North Loop Shopping Center, L.P., Majestic Square, LLC, and Retail Properties of America, Inc. to Fifth Notice of Going Out of Business Sales List Related to the Order (I) Authorizing (A) Entry Into and Performance Under the Asset Purchase Agreement, (B) the Sale of the Debtors Assets to the Buyer, and (C) the Buyer to Conduct Store Closings and Going Out of Business Sales, and (II) Granting Related Relief and Omnibus Notice of Going Out of Business Sales List Related to the Order (I) Authorizing (A) Entry Into and Performance Under the Asset Purchase Agreement, (B) the Sale of the Debtors Assets to the Buyer, and (C) the Buyer to Conduct Store Closings and Going Out of Business Sales, and (II) Granting Related Relief [Filed: 4/7/20] ([Docket No. 1144](#))
- iii. Objection of Brooks Shopping Centers, LLC, to the Debtors' Fifth Notice of Going Out of Business Sales List Related to the Order (I) Authorizing (A) Entry Into and Performance Under the Asset Purchase Agreement, (B) the Sale of the Debtors' Assets to the Buyer, and (C) the Buyer to Conduct Store Closings and Going Out of Business Sales, and (II) Granting Related Relief [Filed: 4/7/20] ([Docket No. 1145](#))
- iv. Objection of Riverwalk Market Place LLC and The Shops At Summerlin North LP to Ninth Notice of Rejection of Unexpired Non Residential Real Property Leases, the Fifth GOB Sales Notice and the Omnibus Amended Notice of GOB Sales List [Filed: 4/7/20] ([Docket No. 1146](#))
- v. Joinder of PCW Properties, LLC in Objections of Other Landlords in Response to (1) Fifth Notice of Going Out of Business Sales List Related to the Order (I) Authorizing (A) Entry Into and Performance Under the Asset Purchase Agreement, (B) the Sale of the Debtors' Assets to the Buyer, and (C) the Buyer to Conduct Store Closings and Going Out of Business Sales, and (II) Granting Related Relief [Filed: 4/10/20] ([Docket No. 1159](#))

- vi. Objection to Fifth Notice of Going Out of Business Sales List Related to the Order (I) Authorizing (A) Entry Into and Performance Under the Asset Purchase Agreement, (B) the Sale of the Debtors' Assets to the Buyer, and (C) the Buyer to Conduct Store Closings and Going Out of Business Sales, and (II) Granting Related Relief Filed by Town & Country Camelback, LLC [Filed: 4/14/20] ([Docket No. 1168](#))
- vii. Objection of Macomb Center Partners, LLC and CPT Riverside Plaza, LLC to (I) Fifth Notice of Going Out of Business Sales List Related to the Order (I) Authorizing (A) Entry into and performance Under the asset Purchase Agreement, (B) the Sale of the Debtors' Assets to the Buyer, and (C) the Buyer to Conduct Store Closings and Going Out of Business Sales, and (II) Granting Related Relief, (II) Ninth Notice of Rejection of Unexpired Non-Residential Real Property Leases, and (III) Motion of F21 OpCo, LLC for Entry of an Order Modifying the Sale Order and Granting Certain Other Relief Relating to Going Out of Business Sales and Store Closings and Joinder in Other Landlord Objections [Filed: 4/14/20] ([Docket No. 1174](#))

Related Documents:

- i. Notice of Hearing for Objections to (I) Fifth Going Out of Business Sales List Related to the Order (I) Authorizing (A) Entry Into and Performance Under the Asset Purchase Agreement, (B) the Sale of the Debtors' Assets to the Buyer, and (C) the Buyer to Conduct Store Closings and Going Out of Business Sales, and (II) Granting Related Relief, (2) Ninth Notice of Rejection of Unexpired Non-Residential Real Property Leases, and (3) Omnibus Amended Notice of Going Out of Business Sales List Related to the Order (I) Authorizing (A) Entry Into and Performance Under the Asset Purchase Agreement, (B) the Sale of the Debtors' Assets to the Buyer, and (C) the Buyer to Conduct Store Closings and Going Out of Business Sales, and (II) Granting Related Relief [Filed: 4/14/20] ([Docket No. 1184](#))

Reply:

- i. **F21 OPCO, LLCs Omnibus Reply in Support of (1) Its Motion for Entry of an Order Modifying the Sale Order and Granting Certain Other Relief Relating to Going out of Business Sales and Store Closings; (2) The Debtors Ninth Notice of Rejection of Unexpired Non-Residential Real Property Leases, (3) The Debtors Fifth Notice of Going out of Business Sales; and (4) the Debtors Omnibus Amended Notice of Going out of Business Sales [Filed: 4/20/20] ([Docket No. 1204](#))**

Status: This matter will be going forward. **The Debtors are informed that F21 has resolved the objections listed at items iv, v and vi under "Responses/Objections Received" above. The Debtors are further informed that F21 continues to negotiate with the remaining objecting parties to reach a resolution with respect to the Fifth GOB Notice.**

3. **Ninth Rejection Notice.** *Ninth Notice of Rejection of Unexpired Non-Residential Real Property Leases* [Filed: 3/31/20] ([Docket No. 1110](#))

Response/Objection Deadline: April 15, 2020 at 4:00 p.m. (ET). Extended for Westfield, LLC to April 17, 2020 at 12:00 p.m. (ET).

Responses/Objections Received:

- i. Objection of Riverwalk Market Place LLC and The Shops At Summerlin North LP to Ninth Notice of Rejection of Unexpired Non Residential Real Property Leases, the Fifth GOB Sales Notice and the Omnibus Amended Notice of GOB Sales List [Filed: 4/7/20] ([Docket No. 1146](#))
- ii. Objection of Brooks Shopping Centers, LLC to Ninth Notice of Rejection of Unexpired Non-Residential Real Property Leases [Filed: 4/14/20] ([Docket No. 1164](#))
- iii. Limited Objection of Azalea Joint Venture, LLC, CRVI SBP LLC, Dimond Center Holdings, LLC, Ingram North Loop Shopping Center, L.P., Majestic Square, LLC, and Retail Properties of America, Inc. to Debtors' Ninth Notice of Rejection of Unexpired Non-Residential Real Property Leases [Filed: 4/14/20] ([Docket No. 1167](#))
- iv. Objection of Macomb Center Partners, LLC and CPT Riverside Plaza, LLC to (I) Fifth Notice of Going Out of Business Sales List Related to the Order (I) Authorizing (A) Entry into and performance Under the asset Purchase Agreement, (B) the Sale of the Debtors' Assets to the Buyer, and (C) the Buyer to Conduct Store Closings and Going Out of Business Sales, and (II) Granting Related Relief, (II) Ninth Notice of Rejection of Unexpired Non-Residential Real Property Leases, and (III) Motion of F21 OpCo, LLC for Entry of an Order Modifying the Sale Order and Granting Certain Other Relief Relating to Going Out of Business Sales and Store Closings and Joinder in Other Landlord Objections [Filed: 4/14/20] ([Docket No. 1174](#))
- v. Objection of G&I VII Reno Operating, L.L.C. to (A) Motion of F21 OpCo, LLC for Entry of an Order Modifying the Sale Order and Granting Certain Other Relief Relating to Going Out of Business Sales and Store Closings, and (B) Ninth Notice of Rejection of Unexpired Non-Residential Real Property Leases [Filed: 4/14/20] ([Docket No. 1177](#))
- vi. Objection of Hines Global REIT, Inc., Jones Lang Lasalle Americas, Inc., PPF RTL Atlantic Town Center, LLC, QIC Properties Us, Inc., Regency Centers, L.P., Shopcore Properties, L.P., Site Centers Corp., Teachers Insurance And Annuity Association, Turnberry Associates, And Weingarten Realty Investors To (I) The Motion Of F21 Opco, LLC For Entry Of An Order Modifying The Sale Order And Granting Certain Other Relief Relating To Going Out Of Business Sales And Store Closings, (II) The Ninth Rejection Notice, And (III) The Omnibus Amended GOB Sale List [Filed: 4/14/20] ([Docket No. 1181](#))

- vii. Objection of Westfield, LLC And Affiliates to Ninth Notice of Rejection of Unexpired Non-Residential Real Property Leases [Filed: 4/17/20] ([Docket No. 1190](#))

Related Documents:

- i. Notice of Hearing for Objections to (I) Fifth Going Out of Business Sales List Related to the Order (I) Authorizing (A) Entry Into and Performance Under the Asset Purchase Agreement, (B) the Sale of the Debtors' Assets to the Buyer, and (C) the Buyer to Conduct Store Closings and Going Out of Business Sales, and (II) Granting Related Relief, (2) Ninth Notice of Rejection of Unexpired Non-Residential Real Property Leases, and (3) Omnibus Amended Notice of Going Out of Business Sales List Related to the Order (I) Authorizing (A) Entry Into and Performance Under the Asset Purchase Agreement, (B) the Sale of the Debtors' Assets to the Buyer, and (C) the Buyer to Conduct Store Closings and Going Out of Business Sales, and (II) Granting Related Relief [Filed: 4/14/20] ([Docket No. 1184](#))
- ii. **Notice of Amendment to the Ninth Notice of Rejection of Unexpired Non-Residential Real Property Leases** [Filed: 4/20/20] ([Docket No. 1202](#))

Reply:

- i. **F21 OPCO, LLCs Omnibus Reply in Support of (1) Its Motion for Entry of an Order Modifying the Sale Order and Granting Certain Other Relief Relating to Going out of Business Sales and Store Closings; (2) The Debtors Ninth Notice of Rejection of Unexpired Non-Residential Real Property Leases, (3) The Debtors Fifth Notice of Going out of Business Sales; and (4) the Debtors Omnibus Amended Notice of Going out of Business Sales** [Filed: 4/20/20] ([Docket No. 1204](#))

Status: This matter will be going forward. **The Debtors are informed that F21 has resolved the objections listed at items i, v and vii under "Responses/Objections Received" above. The Debtors are further informed that F21 continues to negotiate with the remaining objecting parties to reach a resolution with respect to the Ninth Rejection Notice.**

- 4. **Omnibus Amended GOB Notice.** *Omnibus Amended Notice of Going Out of Business Sales List Related to the Order (I) Authorizing (A) Entry Into and Performance Under the Asset Purchase Agreement, (B) the Sale of the Debtors' Assets to the Buyer, and (C) the Buyer to Conduct Store Closings and Going Out of Business Sales, and (II) Granting Related Relief* [Filed: 4/3/20] ([Docket No. 1131](#))

Response/Objection Deadline: N/A

Responses/Objections Received:

- i. Objection of Riverwalk Market Place LLC and The Shops At Summerlin North LP to Ninth Notice of Rejection of Unexpired Non Residential Real Property Leases, the Fifth GOB Sales Notice and the Omnibus Amended Notice of GOB Sales List [Filed: 4/7/20] ([Docket No. 1146](#))
- ii. Limited Objection of G&I VII Reno Operating, L.L.C. to Store Closing Sales Procedures [Filed: 4/14/20] ([Docket No. 1179](#))
- iii. Objection of Hines Global REIT, Inc., Jones Lang Lasalle Americas, Inc., PPF RTL Atlantic Town Center, LLC, QIC Properties Us, Inc., Regency Centers, L.P., Shopcore Properties, L.P., Site Centers Corp., Teachers Insurance And Annuity Association, Turnberry Associates, And Weingarten Realty Investors To (I) The Motion Of F21 Opco, LLC For Entry Of An Order Modifying The Sale Order And Granting Certain Other Relief Relating To Going Out Of Business Sales And Store Closings, (II) The Ninth Rejection Notice, And (III) The Omnibus Amended GOB Sale List [Filed: 4/14/20] ([Docket No. 1181](#))

Related Documents:

- i. Notice of Going Out of Business Sales List Related to the Order (I) Authorizing (A) Entry Into and Performance Under the Asset Purchase Agreement, (B) the Sale of the Debtors' Assets to the Buyer, and (C) the Buyer to Conduct Store Closings and Going Out of Business Sales, and (II) Granting Related Relief [Filed: 3/13/20] ([Docket No. 1062](#))
- ii. Notice of Going Out of Business Sales List Related to the Order (I) Authorizing (A) Entry Into and Performance Under the Asset Purchase Agreement, (B) the Sale of the Debtors' Assets to the Buyer, and (C) the Buyer to Conduct Store Closings and Going Out of Business Sales, and (II) Granting Related Relief [Filed: 3/16/20] ([Docket No. 1066](#))
- iii. Amended Notice of Going Out of Business Sales List Related to the Order (I) Authorizing (A) Entry Into and Performance Under the Asset Purchase Agreement, (B) the Sale of the Debtors' Assets to the Buyer, and (C) the Buyer to Conduct Store Closings and Going Out of Business Sales, and (II) Granting Related Relief [Filed: 3/18/20] ([Docket No. 1073](#))
- iv. Notice of Going Out of Business Sales List Related to the Order (I) Authorizing (A) Entry Into and Performance Under the Asset Purchase Agreement, (B) the Sale of the Debtors' Assets to the Buyer, and (C) the Buyer to Conduct Store Closings and Going Out of Business Sales, and (II) Granting Related Relief [Filed: 3/20/20] ([Docket No. 1080](#))
- v. Notice of Hearing for Objections to (I) Fifth Going Out of Business Sales List Related to the Order (I) Authorizing (A) Entry Into and Performance Under the Asset Purchase Agreement, (B) the Sale of the Debtors' Assets

to the Buyer, and (C) the Buyer to Conduct Store Closings and Going Out of Business Sales, and (II) Granting Related Relief, (2) Ninth Notice of Rejection of Unexpired Non-Residential Real Property Leases, and (3) Omnibus Amended Notice of Going Out of Business Sales List Related to the Order (I) Authorizing (A) Entry Into and Performance Under the Asset Purchase Agreement, (B) the Sale of the Debtors' Assets to the Buyer, and (C) the Buyer to Conduct Store Closings and Going Out of Business Sales, and (II) Granting Related Relief [Filed: 4/14/20] ([Docket No. 1184](#))

Reply:

- i. F21 OPCO, LLCs Omnibus Reply in Support of (1) Its Motion for Entry of an Order Modifying the Sale Order and Granting Certain Other Relief Relating to Going out of Business Sales and Store Closings; (2) The Debtors Ninth Notice of Rejection of Unexpired Non-Residential Real Property Leases, (3) The Debtors Fifth Notice of Going out of Business Sales; and (4) the Debtors Omnibus Amended Notice of Going out of Business Sales [Filed: 4/20/20] ([Docket No. 1204](#))**

Status: This matter will be going forward. **The Debtors are informed that F21 has resolved the objections listed at items i and ii under “Responses/Objections Received” above. The Debtors are further informed that F21 continues to negotiate with the remaining objecting parties to reach a resolution with respect to the Omnibus Amended GOB Notice.**

[Signature on next page.]

Dated: April 20, 2020
Wilmington, Delaware

/s/ James E. O'Neill

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