

**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 MAY 27, 2020, AT 10:30 A.M. (PREVAILING EASTERN TIME)
BEFORE THE HONORABLE MARY F. WALRATH**

***PLEASE TAKE NOTICE: AS THERE ARE NO MATTERS GOING
FORWARD THIS HEARING HAS BEEN CANCELED.***

I. RESOLVED MATTER

1. **Removal Period Extension Motion.** *Second Motion for Entry of an Order (I) Further Enlarging the Period Within Which the Debtors May Remove Actions and (II) Granting Related Relief* [Filed: 4/24/20] (Docket No. 1233)

Response/Objection Deadline: May 8, 2020 at 4:00 p.m. (ET).

Responses/Objections Received: None.

Related Documents:

- i. Certification of Counsel Regarding Second Motion for Entry of an Order (I) Further Enlarging the Period Within Which the Debtors May Remove Actions and (II) Granting Related Relief [Filed: 5/12/20] (Docket No. 1281)
- ii. [Signed] Order (I) Further Enlarging the Period Within Which the Debtors May Remove Actions and (II) Granting Related Relief [Filed: 5/12/20]

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.**

(Docket No. 1283)

Status: The Court has entered the order on this matter and it is now resolved.

II. ADJOURNED MATTER

2. **IVT Compel Motion.** *Motion of IVT Parke Cedar Park, LLC for Order Compelling Debtors to Immediately Comply with 11 U.S.C. § 365(d)(3) and Pay Post-Petition Lease Objections* [Filed: 03/09/20] ([Docket No. 1035](#))

Response/Objection Deadline: March 18, 2020 at 4:00 p.m. (ET). Extended for the Debtors to May 20, 2020 at 4:00 p.m. (ET).

Responses/Objections Received: None at this time.

Related Documents: None at this time.

Status: The Debtors and IVT Parke Cedar Park, LLC continue to negotiate a resolution of this matter. This matter is being adjourned to a date to be determined.

III. UNCONTESTED MATTER UNDER COC

3. **KPMG Interim Application.** *First Interim Fee Application of KPMG LLP for Compensation for Services Rendered and Reimbursement of Expenses as Auditor, Tax Compliance Service Provider, and Tax Consultant to the Debtors for the Period from September 29, 2019 through December 31, 2019* [Filed: 4/16/20] ([Docket No. 1188](#))

Response/Objection Deadline: May 7, 2020 at 4:00 p.m. (ET).

Responses/Objections Received:

- i. Fee Examiner's Final Report Pertaining to First Interim Fee Application of KPMG LLP [Filed: 5/21/20] ([Docket No. 1303](#))

Related Documents:

- i. First Application of KPMG LLP for Compensation for Services Rendered and Reimbursement of Expenses as Auditor, Tax Compliance Service Provider, and Tax Consultant to the Debtors for the Period from September 29, 2019 through October 31, 2019 [Filed: 3/31/20] ([Docket No. 1111](#))
- ii. Certificate of No Objection (No Order Required) Regarding First Application of KPMG LLP for Compensation for Services Rendered and Reimbursement of Expenses as Auditor, Tax Compliance Service

Provider, and Tax Consultant to the Debtors for the Period from September 29, 2019 through October 31, 2019 [Filed: 4/22/20] ([Docket No. 1217](#))

- iii. Second Application of KPMG LLP for Compensation for Services Rendered and Reimbursement of Expenses as Auditor, Tax Compliance Service Provider, and Tax Consultant to the Debtors for the Period from November, 2019 through November 30, 2019 [Filed: 4/3/20] ([Docket No. 1134](#))
- iv. Certificate of No Objection (No Order Required) Regarding Second Application of KPMG LLP for Compensation for Services Rendered and Reimbursement of Expenses as Auditor, Tax Compliance Service Provider, and Tax Consultant to the Debtors for the Period from November, 2019 through November 30, 2019 [Filed: 4/27/20] ([Docket No. 1240](#))
- v. Third Application of KPMG LLP for Compensation for Services Rendered and Reimbursement of Expenses as Auditor, Tax Compliance Service Provider, and Tax Consultant to the Debtors for the Period from December 1, 2019 through December 31, 2019 [Filed: 4/10/20] ([Docket No. 1161](#))
- vi. Certificate of No Objection (No Order Required) Regarding Third Application of KPMG LLP for Compensation for Services Rendered and Reimbursement of Expenses as Auditor, Tax Compliance Service Provider, and Tax Consultant to the Debtors for the Period from December 1, 2019 through December 31, 2019 [Filed: 5/4/20] ([Docket No. 1265](#))
- vii. Certification of Counsel Regarding First Interim Fee Application of KPMG LLP for Compensation for Services Rendered and Reimbursement of Expenses as Auditor, Tax Compliance Service Provider, and Tax Consultant to the Debtors for the Period from September 29, 2019 through December 31, 2019 [Filed: 5/22/20] ([Docket No. 1307](#))
- viii. **[Signed] Order Granting First Interim Fee Application of KPMG LLP for Compensation for Services Rendered and Reimbursement of Expenses as Auditor, Tax Compliance Service Provider, and Tax Consultant to the Debtors for the Period from September 29, 2019 Through December 31, 2019 [Filed 5/26/20] (Docket No. 1312)**

Status: **The order has been entered on this matter and it is now resolved.**

III. MATTER GOING FORWARD

4. **Exclusivity Motion.** *Debtors' Second Motion for Entry of an Order (I) Further Extending the Debtors' Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof Pursuant to Section 1121 of the Bankruptcy Code and (II) Granting Related Relief* [Filed: 04/24/20] ([Docket No. 1232](#))

Response/Objection Deadline: May 8, 2020 at 4:00 p.m. (ET).

Response Received:

- i. U.S. Trustee's Response and Reservation of Rights to the Debtors' Motion for Entry of an Order (I) Further Extending the Debtors Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof Pursuant to Section 1121 of the Bankruptcy Code, and (II) Granting Related Relief [Filed: 5/8/20] ([Docket No. 1274](#))

Related Documents:

- i. **Certification of Counsel Regarding Debtors' Second Motion for Entry of an Order (I) Further Extending the Debtors' Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof Pursuant to Section 1121 of the Bankruptcy Code and (II) Granting Related Relief** [Filed: 5/26/20] ([Docket No. 1301](#))
- ii. **[Signed] Order (I) Further Extending the Debtors' Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof Pursuant to Section 1121 of the Bankruptcy Code and (II) Granting Related Relief** [Filed: 5/26/20] ([Docket No. 1313](#))

Reply:

- i. Debtors' Reply to the United States Trustee's Response and Reservation of Rights to Debtors Second Motion for Entry of an Order (I) Further Extending the Debtors Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptance Thereof Pursuant to Section 1121 of the Bankruptcy Code and (II) Granting Related Relief [Filed: 5/21/210] ([Docket No. 1304](#))

Status: **The order has been entered on this matter and it is now resolved.**

[Signature on next page.]

Dated: May 26, 2020
Wilmington, Delaware

/s/ James E. O'Neill

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