

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

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

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**NOTICE OF AGENDA ON MATTERS SCHEDULED FOR TELEPHONIC HEARING  
ON AUGUST 19, 2020, AT 10:30 A.M. (PREVAILING EASTERN TIME)  
BEFORE THE HONORABLE MARY F. WALRATH**

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**This hearing will be held telephonically and by video. All parties wishing to appear must do so telephonically by contacting COURTCALL, LLC at 866-582-6878 no later than Aug. 18, 2020, at 12:00 p.m. to sign up. Additionally, anyone wishing to appear by Zoom is invited to use the link below. All parties that will be arguing or testifying must appear by Zoom and CourtCall.**

**PLEASE NOTE THAT THE MICROPHONES ON THE ZOOM MEETING WILL BE MUTED AND THE ONLY AUDIO WILL BE THROUGH COURTCALL.**

**Topic: Forever 21 19-12122**

**Time: Aug. 19, 2020 10:30 AM Eastern Time (US and Canada)**

**Join ZoomGov Meeting**

**<https://debuscourts.zoomgov.com/j/1618462598>**

**Meeting ID: 161 846 2598**

**Passcode: 371565**

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<sup>1</sup> 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.

**I. RESOLVED MATTERS**

1. **First Omnibus Assumption Motion.** *Debtors' First Omnibus Motion for Entry of an Order Approving the Assumption and Assignment of Executory Contracts to F21 OpCo, LLC* [Filed: 5/15/20] (Docket No. 1290)

Response/Objection Deadline: May 29, 2020 at 4:00 p.m. (ET).

Responses/Objections Received:

- i. Informal Comments from AT&T Corp.
- ii. Informal Comments from Bloomreach, Inc.
- iii. Informal Comments from Bravado.
- iv. Informal Comments from Broadspire Services, Inc.
- v. Informal Comments from Cayan LLC.
- vi. Informal Comments from Cisco Systems Capital Corp.
- vii. Informal Comments from Concur Technologies, LLC.
- viii. Informal Comments from Constellation New Energy, Inc.
- ix. Informal Comments from Dialoga Group, LLC.
- x. Informal Comments from Disney Consumer Products, Inc.
- xi. Informal Comments from Garda CL Southwest, Inc.
- xii. Informal Comments from Google LLC.
- xiii. Objection of Alabama Power Company to the First Omnibus Motion for Entry of an Order Approving the Assumption and Assignment of Executory Contracts to F21 OPCO [Filed: 5/28/20] (Docket No. 1325)
- xiv. Limited Objection and Response of Brink's, Inc. to Debtors First Omnibus Motion for Entry of an Order Approving the Assumption and Assignment of Executory Contracts to buyer, F21 Opco, LLC [Filed: 5/29/20] (Docket No. 1334)
- xv. Objection of the Chubb Companies to the Debtors First Omnibus Motion For Entry of an Order Approving the Assumption and Assignment of Executory Contracts to F21 OpCo, LLC [Filed: 5/29/20] (Docket No. 1341)
- xvi. Randstad General Partner (US), LLC and Randstad North America, Inc.'s Response and Limited Objection to Debtors First Omnibus Motion For Entry of an Order Approving the Assumption and Assignment of Executory Contracts to F21 OpCo, LLC [Filed: 6/1/20] (Docket No. 1346)

Related Documents:

- i. Notice of Hearing on Debtors' First Omnibus Motion for Entry of an Order

Approving the Assumption and Assignment of Executory Contracts to F21 OpCo, LLC [Filed: 5/18/20] (Docket No. 1294)

- ii. Certification of Counsel Regarding Debtors' First Omnibus Motion for Entry of an Order Approving the Assumption and Assignment of Executory Contracts to F21 OpCo, LLC [Filed: 6/12/20] (Docket No. 1365)
- iii. [Signed] First Order Approving, In Part, the First Omnibus Motion to Assume and Assign Executory Contracts to F21 OpCo, LLC [Filed: 6/12/20] (Docket No. 1367)
- iv. Certification of Counsel Regarding Second Order Approving, in Part, the First Omnibus Motion to Assume and Assign Executory Contracts to F21 Opco, LLC [Filed: 7/2/20] (Docket No. 1397)
- v. [Signed] Second Order Approving, In Part, the First Omnibus Motion to Assume and Assign Executory Contracts to F21 OpCo, LLC [Filed: 7/6/20] (Docket No. 1399)
- vi. Certification of Counsel Regarding Third Order Approving, in Part, the First Omnibus Motion to Assume and Assign Executory Contracts to F21 Opco, LLC [Filed: 7/22/20] (Docket No. 1453)
- vii. [Signed] Third Order Approving, in Part, the First Omnibus Motion to Assume and Assign Executory Contracts to F21 Opco, LLC [Filed: 7/23/20] (Docket No. 1455)

Status: This matter has been resolved. The Court has entered orders on this matter resolving all objections or comments of certain contract counterparties, and the Debtors have also filed notices of rejection rendering the objections or comments of certain contract counterparties moot.

2. **Second Omnibus Assumption Motion.** *Debtors' Second Omnibus Motion for Entry of an Order Approving the Assumption and Assignment of Executory Contracts to F21 OpCo, LLC* [Filed: 5/15/20] (Docket No. 1291)

Response/Objection Deadline: May 29, 2020 at 4:00 p.m. (ET).

Responses/Objections Received:

- i. Informal Comments from K-Swiss Inc.
- ii. Informal Comments from Protection One.
- iii. Informal Comments from RGIS.
- iv. Informal Comments from Schindler Elevator Corp.
- v. Informal Comments from Sidecar Interactive Inc.
- vi. Informal Comments from Stericycle Environmental Solutions.

- vii. Informal Comments from Tata Consultancy Services Limited.
- viii. Informal Comments from Total Quality Logistics.
- ix. Informal Comments from Twentieth Century Fox Licensing and Merchandising.
- x. Limited Objection of Microsoft to Debtors' Second Omnibus Motion for Entry of an Order Approving the Assumption and Assignment of Executory Contracts to F21 OpCo, LLC [Filed: 5/29/20] (Docket No. 1330)
- xi. Objection of Kone, Inc. to Debtors' Notice of Cure Amounts and Potential Assumption and Assignment of Executory Contracts to F21 OpCo, LLC [Filed: 5/29/20] (Docket No. 1332)
- xii. Limited Objection of Verizon Business Global LLC and XO Communications Services, LLC to the Debtors' Second Omnibus Motion for Entry of an Order Approving the Assumption and Assignment of Executory Contracts to F21 OpCo, LLC [Filed: 5/29/20] (Docket No. 1337)
- xiii. Limited Objection of Sony Interactive Entertainment LLC to Debtors' Second Omnibus Motion for Entry of an Order Approving the Assumption and Assignment of Executory Contracts to F21 OpCo, LLC [Filed: 5/29/20] (Docket No. 1339)
- xiv. Objection to Debtors' Second Omnibus Motion for Entry of an Order Approving the Assumption and Assignment of Executory Contracts to F21 OpCo, LLC Filed by R.J. Acquisition Corp. d/b/a AD Art Company [Filed: 5/29/20] (Docket No. 1340)

Related Documents:

- i. Notice of Hearing on Debtors' Second Omnibus Motion for Entry of an Order Approving the Assumption and Assignment of Executory Contracts to F21 OpCo, LLC [Filed: 5/18/20] (Docket No. 1296)
- ii. Certification of Counsel Regarding Debtors' Second Omnibus Motion for Entry of an Order Approving the Assumption and Assignment of Executory Contracts to F21 OpCo, LLC [Filed: 6/12/20] (Docket No. 1366)
- iii. [Signed] First Order Approving, In Part, the Second Omnibus Motion to Assume and Assign Executory Contracts to F21 OpCo, LLC [Filed: 6/12/20] (Docket No. 1368)
- iv. Certification of Counsel Regarding Second Order Approving, in Part, the Second Omnibus Motion to Assume and Assign Executory Contracts to F21 OpCo, LLC [Filed: 7/2/20] (Docket No. 1398)
- v. [Signed] Second Order Approving, In Part, the Second Omnibus Motion to Assume and Assign Executory Contracts to F21 OpCo, LLC [Filed: 7/6/20] (Docket No. 1400)

- vi. Certification of Counsel Regarding Third Order Approving, In Part, the Second Omnibus Motion to Assume and Assign Executory Contracts to F21 OpCo, LLC [Filed: 8/7/20] (Docket No. 1482)
- vii. [Signed] Third Order Approving, In Part, the Second Omnibus Motion to Assume and Assign Executory Contracts to F21 OpCo, LLC [Filed: 8/10/20] (Docket No. 1488)

Status: This matter has been resolved. The Court has entered orders on this matter resolving all objections or comments of certain contract counterparties, and the Debtors have also filed notices of rejection rendering the objections or comments of certain contract counterparties moot.

## II. ADJOURNED MATTER

- 3. **Stay Motion.** *Jowharah Hameed-Bolden and Ali Conrad O'Brien's Motion for Relief from the Automatic Stay* [Filed: 5/29/20] (Docket No. 1333)

Response/Objection Deadline: June 12, 2020 at 4:00 p.m. (ET). Extended for the Debtors to Sept. 9, 2020 at 4:00 p.m. (ET).

Responses/Objections Received: None at this time.

Related Documents: None at this time.

Status: This matter is being adjourned by agreement of the parties to September 16, 2020 at 11:30 a.m. (ET).

## III. UNCONTESTED MATTERS UNDER COC

- 4. **Rumbo Stay Motion.** *Motion of Evelyn Rumbo for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d)* [Filed: 5/29/20] ([Docket No. 1335](#))

Response/Objection Deadline: June 15, 2020 at 4:00 p.m. (ET). Extended for the Debtors to July 24, 2020 at 4:00 p.m. (ET).

Responses/Objections Received: None at this time.

Related Documents:

- i. Certification of Counsel [TBF]

Status: The parties have resolved this motion and will submit a stipulation for the Court's approval under certification of counsel. No hearing is necessary on this matter.

5. **Anderson Stay Motion.** *Motion for Relief from Stay Filed by Saroya Anderson* [Filed: 7/13/20] ([Docket No. 1423](#))

Response Deadline: July 27, 2020 at 4:00 p.m. (ET)

Responses/Objections Received: Informal comments of the Debtors.

Related Documents:

- i. Certification of Counsel Requesting Entry of Order Approving Stipulation Providing Saroya C. Anderson Limited Relief from the Automatic Stay to Pursue State Court Action Against Debtors [Filed: 8/14/20] ([Docket No. 1495](#))

Status: A certification of counsel with a proposed order resolving this matter has been submitted for the Court's consideration. No hearing is necessary on this matter.

#### IV. **CONTESTED MATTER GOING FORWARD**

6. **Deloitte Payment Motion.** *Debtors' Motion For Entry Of An Order (I) Authorizing (A) The Immediate Payment Of Certain Outstanding And Uncontested Fees Of Deloitte Tax LLP Incurred As Tax Services Providers To The Debtors For The Period From January 1, 2020 Through April 30, 2020 and (B) The Payment Of Compensation For Services Rendered And Reimbursement Of Expenses Incurred By Deloitte Tax LLP As Tax Services Providers From May 1, 2020 Onwards Pursuant to and Solely to the Extent Authorized By the Interim Compensation Order and (II) Granting Related Relief* [Filed: 7/28/20] ([Docket No. 1467](#))

Response/Objection Deadline: August 12, 2020 at 4:00 p.m. (ET).

Response Received:

- i. United States Trustee's Response to Debtors' Motion for Entry of an Order Authorizing the Immediate Payment of Certain Outstanding and Uncontested Fees of Deloitte Tax LLP, and Seeking Related Relief [Filed: 8/12/20] ([Docket No. 1490](#))

Related Documents: None.

Reply Deadline: August 14, 2020 at 4:00 p.m. (ET).

Reply:

- i. Debtors' Reply to the United States Trustee's Response to Debtors' Motion for Entry of an Order Authorizing the Immediate Payment of Certain

Outstanding and Uncontested Fees of Deloitte Tax LLP, and Seeking  
Related Relief [Filed: 8/16/20] ([Docket No. 1497](#))

Status: This matter will be going forward.

Dated: August 17, 2020  
Wilmington, Delaware

*/s/ James E. O'Neill*

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