

**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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**THIRD<sup>2</sup> AMENDED<sup>3</sup> NOTICE OF AGENDA ON MATTERS SCHEDULED FOR  
TELEPHONIC HEARING ON SEPTEMBER 16, 2020, AT 11:30 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 Sept. 15, 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: Sept. 16, 2020 11:30 AM Eastern Time (US and Canada)**

**Join ZoomGov Meeting**

**<https://debuscourts.zoomgov.com/j/1605095254>**

**Meeting ID: 160 509 5254**

**Passcode: 222694**

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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.

<sup>2</sup> Amended items noted in bold.

<sup>3</sup> Amended solely to reflect the correct hearing time.

**I. ADJOURNED MATTER**

1. **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 October 7, 2020 at 4:00 p.m. (ET).

Responses/Objections Received: None at this time.

Related Documents: None at this time.

Status: This matter is adjourned to October 14, 2020 at 11:30 a.m. (ET).

**II. RESOLVED MATTER**

2. **Removal Extension Motion.** *Debtors' Third Motion for Entry of an Order (I) Further Enlarging the Period Within Which the Debtors May Remove Actions and (II) Granting Related Relief* [Filed 8/21/20] ([Docket No. 1515](#))

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

Responses/Objections Received: None.

Related Documents:

- i. Certification of No Objection Regarding Debtors' Third Motion for Entry of an Order (I) Further Enlarging the Period Within Which the Debtors May Remove Actions and (II) Granting Related Relief [Filed 9/10/20] ([Docket No. 1557](#))
- ii. Order (I) Further Enlarging the Period Within Which the Debtors May Remove Actions and (II) Granting Related Relief [Filed 9/10/20] ([Docket No. 1558](#))

Status: An Order has been entered on this matter. No hearing is needed.

**III. UNCONTESTED FEE APPLICATIONS**

3. **Deloitte First Interim.** *First Interim Fee Application of Deloitte Tax LLP for Compensation for Services Rendered and Reimbursement for Expenses Incurred as Tax Services Provider to the Debtors for the Period September 29, 2019 through December 31, 2019* [Filed: 8/19/20] ([Docket No. 1508](#))

Response/Objection Deadline: September 9, 2020 at 4:00 p.m. (ET).

Responses/Objections Received: Informal comments received from the Fee Examiner.

Related Documents:

- i. First Monthly Fee Application of Deloitte Tax LLP for Compensation for Services Rendered and Reimbursement for Expenses Incurred as Tax Services Provider to the Debtors for the Period September 29, 2019 through October 31, 2019 [Filed: 4/3/20] ([Docket No. 1122](#))
- ii. [Revised] Monthly Fee Application of Deloitte Tax LLP for Compensation for Services Rendered and Reimbursement for Expenses Incurred as Tax Services Provider to the Debtors for the Period September 29, 2019 through October 31, 2019 [Filed: 4/7/20] ([Docket No. 1143](#))
- iii. Certificate of No Objection (No Order Required) Regarding [Revised] Monthly Fee Application of Deloitte Tax LLP for Compensation for Services Rendered and Reimbursement for Expenses Incurred as Tax Services Provider to the Debtors for the Period September 29, 2019 through October 31, 2019 [Filed: 4/29/20] ([Docket No. 1251](#))
- iv. Combined Second Monthly Fee Application of Deloitte Tax LLP for Compensation for Services Rendered and Reimbursement for Expenses Incurred as Tax Services Provider to the Debtors for the Period from November 1, 2019 through December 31, 2019 [Filed: 4/27/20] ([Docket No. 1241](#))
- v. Certificate of No Objection (No Order Required) Regarding Combined Second Monthly Fee Application of Deloitte Tax LLP for Compensation for Services Rendered and Reimbursement for Expenses Incurred as Tax Services Provider to the Debtors for the Period from November 1, 2019 through December 31, 2019 [Filed: 5/19/20] ([Docket No. 1299](#))
- vi. 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 from May 1, 2020 Onwards Pursuant to and Solely to the Extent Authorized by the Interim Compensation Order and (II) Granting Related Relief [Filed: 8/19/20] ([Docket No. 1505](#))
- vii. **Fee Examiner's Final Report Pertaining to First and Second Interim Fee Applications of Deloitte Tax LLP [Filed: 9/15/20] ([Docket No. 1575](#))**

Status: This matter is going forward. The informal comments of the Fee Examiner have been resolved.

4. **Deloitte Second Interim.** *Second Interim Fee Application of Deloitte Tax LLP for Compensation for Services Rendered and Reimbursement for Expenses Incurred as Tax Services Provider to the Debtors for the period January 1, 2020 through March 31, 2020* [Filed: 8/19/20] ([Docket No. 1509](#))

Response/Objection Deadline: September 9, 2020 at 4:00 p.m. (ET).

Responses/Objections Received: Informal comments received from the Fee Examiner.

Related Documents:

- i. Combined Third Monthly Fee Application of Deloitte Tax LLP for Compensation for Services Rendered and Reimbursement for Expenses Incurred as Tax Services Provider to the Debtors for the Period from January 1, 2020 through March 31, 2020 [Filed 6/19/20] ([Docket No. 1375](#))
- ii. Certificate of No Objection (No Order Required) Regarding Combined Third Monthly Fee Application of Deloitte Tax LLP for Compensation for Services Rendered and Reimbursement for Expenses Incurred as Tax Services Provider to the Debtors for the Period from January 1, 2020 through March 31, 2020 [Filed 7/13/20] ([Docket No. 1427](#))
- iii. 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 from May 1, 2020 Onwards Pursuant to and Solely to the Extent Authorized by the Interim Compensation Order and (II) Granting Related Relief [Filed 8/19/20] ([Docket No. 1505](#))
- iv. **Fee Examiner's Final Report Pertaining to First and Second Interim Fee Applications of Deloitte Tax LLP** [Filed: 9/15/20] ([Docket No. 1575](#))

Status: This matter is going forward. The informal comments of the Fee Examiner have been resolved.

**IV. CONTESTED MATTER GOING FORWARD**

5. **Conversion Motion.** *United States Trustee's Motion for an Order, Pursuant to 11 U.S.C. § 1112(b), Converting the Debtors' Chapter 11 Cases to Cases under Chapter 7 of the Bankruptcy Code* [Filed: 8/19/20] ([Docket No. 1511](#))

Response/Objection Deadline: September 4, 2020 at 4:00 p.m. (ET). Extended for

the Debtors to September 6, 2020 at 12:00 p.m. (ET).

Responses Received:

- i. Response of Kenneth Wu to Motion to Convert [Filed: 8/31/20] ([Docket No. 1527](#))
- ii. Limited Joinder to Motion to Convert Chapter 11 Case to a Case Under Chapter 7 Filed by WeiHai ShangShan Imp. & Exp. Co., Ltd.; Only Star (Ningbo) Co., Ltd.; Regentex Apparel Limited; V & E Accessories Inc.; Hongkong Olive Fashion Co., Limited; LIFU Enterprises Corp.; RGB Imp. & Exp. Tra. [Filed: 9/1/20] ([Docket No. 1529](#))
- iii. Objection to the U.S. Trustee's Motion for Order, Converting the Debtors' Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code Filed by Nantong D&J Fashion Co., Ltd. [Filed: 9/4/20] ([Docket No. 1532](#))
- iv. Objection to the U.S. Trustee's Motion for an Order, Converting the Debtors' Chapter 11 Cases to Cases under Chapter 7 of the Bankruptcy Code Filed by CFH Fashion Inc. [Filed: 9/4/20] ([Docket No. 1534](#))
- v. Objection to the U.S. Trustee's Motion for an Order, Converting the Debtors' Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code Filed by C&D Garments [Filed: 9/4/20] ([Docket No. 1535](#))
- vi. Objection to the U.S. Trustee's Motion for an Order, Converting the Debtors' Chapter 11 Cases to Cases under Chapter 7 of the Bankruptcy Code Filed by C&C Nantong Cathay Clothing Co., Ltd. [Filed: 9/4/20] ([Docket No. 1536](#))
- vii. Debtors' Opposition to the United States Trustee's Motion for an Order, Pursuant to 11 U.S.C. 1112(B), Converting the Debtors' Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code [Filed: 9/6/20] ([Docket No. 1540](#))
- viii. Kukdong Corp's Opposition to the United States Trustee's Motion for an Order, Pursuant to 11 U.S.C. § 1112(b), Converting the Debtors' Chapter 11 Cases to Cases under Chapter 7 of the Bankruptcy Code [Filed: 9/9/20] ([Docket No. 1543](#))
- ix. Kisoo K. Trading Inc.'s Opposition to the United States Trustee's Motion for an Order, Pursuant to 11 U.S.C. § 1112(b), Converting the Debtors' Chapter 11 Cases to Cases under Chapter 7 of the Bankruptcy Code [Filed: 9/9/20] ([Docket No. 1544](#))
- x. In Kyung Apparel Co., Ltd's Opposition to the United States Trustee's Motion for an Order, Pursuant to 11 U.S.C. § 1112(b), Converting the Debtors' Chapter 11 Cases to Cases under Chapter 7 of the Bankruptcy Code [Filed: 9/9/20] ([Docket No. 1545](#))
- xi. KNF International Co., Ltd's Opposition to the United States Trustee's Motion for an Order, Pursuant to 11 U.S.C. § 1112(b), Converting the

- Debtors' Chapter 11 Cases to Cases under Chapter 7 of the Bankruptcy Code [Filed: 9/9/20] ([Docket No. 1546](#))
- xii. Leukon Inc.'s Opposition to the United States Trustee's Motion for an Order, Pursuant to 11 U.S.C. § 1112(b), Converting the Debtors' Chapter 11 Cases to Cases under Chapter 7 of the Bankruptcy Code [Filed: 9/9/20] ([Docket No. 1547](#))
  - xiii. Tarae Co., Ltd's Opposition to the United States Trustee's Motion for an Order, Pursuant to 11 U.S.C. § 1112(b), Converting the Debtors' Chapter 11 Cases to Cases under Chapter 7 of the Bankruptcy Code [Filed: 9/9/20] ([Docket No. 1548](#))
  - xiv. Intec Ltd's Opposition to the United States Trustee's Motion for an Order, Pursuant to 11 U.S.C. § 1112(b), Converting the Debtors' Chapter 11 Cases to Cases under Chapter 7 of the Bankruptcy Code [Filed: 9/9/20] ([Docket No. 1549](#))
  - xv. U-Knits Inc.'s Opposition to the United States Trustee's Motion for an Order, Pursuant to 11 U.S.C. § 1112(b), Converting the Debtors' Chapter 11 Cases to Cases under Chapter 7 of the Bankruptcy Code [Filed: 9/9/20] ([Docket No. 1550](#))
  - xvi. Marjo Apparel Co., Ltd's Opposition to the United States Trustee's Motion for an Order, Pursuant to 11 U.S.C. § 1112(b), Converting the Debtors' Chapter 11 Cases to Cases under Chapter 7 of the Bankruptcy Code [Filed: 9/9/20] ([Docket No. 1551](#))
  - xvii. Tabitha Apparel Co., Ltd's Opposition to the United States Trustee's Motion for an Order, Pursuant to 11 U.S.C. § 1112(b), Converting the Debtors' Chapter 11 Cases to Cases under Chapter 7 of the Bankruptcy Code [Filed: 9/9/20] ([Docket No. 1552](#))
  - xviii. B-Heim Corp's Opposition to the United States Trustee's Motion for an Order, Pursuant to 11 U.S.C. § 1112(b), Converting the Debtors' Chapter 11 Cases to Cases under Chapter 7 of the Bankruptcy Code [Filed: 9/9/20] ([Docket No. 1553](#))
  - xix. Dongsuh International Co., Ltd's Opposition to the United States Trustee's Motion for an Order, Pursuant to 11 U.S.C. § 1112(b), Converting the Debtors' Chapter 11 Cases to Cases under Chapter 7 of the Bankruptcy Code [Filed: 9/9/20] ([Docket No. 1554](#))
  - xx. *Joinder to Debtors' Opposition to United States Trustee's Motion to Convert the Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code* Filed by Official Committee of Unsecured Creditors of Forever 21, Inc., et al. [Filed: 9/10/20] ([Docket No. 1564](#))

Related Documents:

- i. Notice of Filing Joint Exhibit List in Connection with the United States Trustee's Motion for an Order, Pursuant to 11 U.S.C. § 1112(B), Converting the Debtors' Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code [Filed: 9/14/20] ([Docket No. 1573](#))

Reply Deadline: September 11, 2020 at 4:00 p.m. (ET).

Reply:

- i. U.S. Trustee's Omnibus Reply to the Objections to the U.S. Trustees Motion for an Order Pursuant to 11 U.S.C. § 1112(b), Converting the Debtors Chapter 11 Cases to Cases under Chapter 7 of the Bankruptcy Code [Filed: 9/11/20] ([Docket No. 1569](#))

Status: This matter will be going forward. The Movant intends to call the Karen E. Starr, Bankruptcy Analyst, Office of the United States Trustee and tender Ms. Starr's affidavit as her direct testimony. The Debtors intend to call Jonathan Goulding, Managing Director, Alvarez & Marsal North America, LLC, the Debtors' Chief Restructuring Officer, as a witness. Mr. Goulding is located in Los Angeles. A joint exhibit list has been filed with the Court.

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Dated: September 16, 2020  
Wilmington, Delaware

*/s/ James E. O'Neill*

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