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*Proposed Attorneys for Debtors  
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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re</b>	:	<b>Chapter 11</b>
	:	
<b>FUSION CONNECT, INC., et al.,</b>	:	<b>Case No. 19-11811 (SMB)</b>
	:	
<b>Debtors.<sup>1</sup></b>	:	<b>(Jointly Administered)</b>
	:	
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**NOTICE OF HEARING  
ON JULY 1, 2019 AT 2:00 P.M. (EASTERN TIME)**

**PLEASE TAKE NOTICE** that a hearing to consider entry of final orders approving the Motions and Applications set forth on **Exhibit A** hereto of Fusion Connect, Inc. and its debtor subsidiaries, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”), will take place on **July 1, 2019 at 2:00 p.m. (Eastern Time)** (the “**Hearing**”). The Hearing will be held before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are Fusion Connect, Inc. (2021); Fusion BCHI Acquisition LLC (7402); Fusion NBS Acquisition Corp. (4332); Fusion LLC (0994); Fusion MPHC Holding Corporation (3066); Fusion MPHC Group, Inc. (1529); Fusion Cloud Company LLC (5568); Fusion Cloud Services, LLC (3012); Fusion CB Holdings, Inc. (6526); Fusion Communications, LLC (8337); Fusion Telecom, LLC (0894); Fusion Texas Holdings, Inc. (2636); Fusion Telecom of Kansas, LLC (0075); Fusion Telecom of Oklahoma, LLC (3260); Fusion Telecom of Missouri, LLC (5329); Fusion Telecom of Texas Ltd., L.L.P. (8531); Bircan Holdings, LLC (2819); Fusion Management Services LLC (5597); and Fusion PM Holdings, Inc. (2478). The principal executive office of the Debtors is located at 420 Lexington Avenue, Suite 1718, New York, New York 10170.

of New York, Courtroom 723, One Bowling Green, New York, New York 10004  
(the “**Bankruptcy Court**”).

**PLEASE TAKE FURTHER NOTICE** that any responses or objections  
(the “**Objections**”) to the Motions or Applications shall be in writing, shall conform to the  
Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District  
of New York, shall be filed with the Bankruptcy Court (a) by attorneys practicing in the  
Bankruptcy Court, including attorneys admitted *pro hac vice*, electronically in accordance with  
General Order M-399 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)), and (b) by all other  
parties in interest, on a CD-ROM, in text-searchable portable document format (PDF) (with a  
hard copy delivered directly to Chambers), in accordance with the customary practices of the  
Bankruptcy Court and General Order M-399, to the extent applicable, and shall be served in  
accordance with General Order M-399, so as to be filed and received no later than **June 24, 2019**  
**at 4:00 p.m. (Eastern Time)** (the “**Objection Deadline**”).

*[Remainder of Page Intentionally Left Blank]*

**PLEASE TAKE FURTHER NOTICE** that if no Objections are timely filed and served with respect to the Motions or Applications, the Debtors may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the applicable Motion or Application, which order may be entered without further notice or hearing.

Dated: June 17, 2019  
New York, New York

/s/ Sunny Singh  
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**Exhibit A**

**Motions and Applications**

**Motions and Applications Scheduled To Be Heard on July 1, 2019**

- Debtors' Motion for Entry of an Order (I) Approving (A) Bidding Procedures and (B) Assumption and Assignment Procedures and (II) Granting Related Relief [**ECF No. 36**]
- Debtor's Motion for (I) Authorization to (A) Continue Using Existing Cash Management System, Bank Accounts, and Business Forms, (B) Implement Changes to the Cash Management System in the Ordinary Course of Business, (C) Continue Intercompany Transactions, (D) Provide Administrative Expense Priority for Postpetition Intercompany Claims, (E) Extend Time to Comply with, or Seek Waiver of, 11 U.S.C. § 345(b), and (II) Related Relief [**ECF No. 4, Interim Order ECF No. 48**]
- Motion of Debtors for Authorization to Maintain and Administer Their Existing Customer Programs and Honor Certain Prepetition Obligations Related Thereto [**ECF No. 12, Interim Order ECF No. 51**]
- Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a) and 362 for Entry of Interim and Final Orders Establishing Notification Procedures and Approving the Restrictions on (A) Certain Transfers of Interests in the Debtors and (B) Claiming a Worthless Stock Deduction [**ECF No. 8, Interim Order ECF No. 52**]
- Motion of Debtors for (I) Authorization to (A) Pay Employee Obligations and (B) Continue Employee Benefit Programs and (II) Related Relief [**ECF No. 5, Interim Order ECF No. 54**]
- Motion of Debtors for (I) Authorization to Pay Certain Prepetition Obligations to Critical Vendors, Lien Claimants, and Foreign Creditors, (II) Approval of Related Procedures, (III) Confirmation of Administrative Expense Priority Status for Certain Goods Delivered and Services Provided Postpetition, and (IV) Related Relief [**ECF No. 11, Interim Order ECF No. 55**]
- Motion of Debtors for (I) Authorization (A) To Obtain Postpetition Financing, (B) To Use Cash Collateral, (C) To Grant Liens and Provide Superpriority Administrative Expense Status, (D) To Grant Adequate Protection, (E) To Modify the Automatic Stay; (F) To Schedule a Final Hearing and (II) Related Relief [**ECF No. 17, Interim Order ECF No. 57**]
- Motion of Debtors for (I) Authorization to (A) Continue to Maintain their Insurance Policies and Programs and Surety Bond Program and (B) Honor All Obligations with Respect Thereto and (II) Modification of the Automatic Stay with Respect To the Workers' Compensation Program [**ECF No. 6, Interim Order ECF No. 71**]
- Motion of Debtors for Authorization to Pay (I) Certain Prepetition Taxes and Fees and (II) Fees of Third Party Service Providers [**ECF No. 7, Interim Order ECF No. 72**]

- Motion of Debtors for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [ECF No. 82]
- Motion of Debtors for Authorization to Employ Professionals Used in Ordinary Course of Business [ECF No. 87]
- Application of Debtors for Authorization to Retain and Employ Prime Clerk LLC as Administrative Agent *Nunc Pro Tunc* to Commencement Date [ECF No. 83]
- Debtors' Application for Entry of an Order Authorizing the Employment and Retention of PJT Partners LP as Investment Banker for the Debtors Effective *Nunc Pro Tunc* to the Commencement Date [ECF No. 84]
- Application of Debtors for Authority to Retain and Employ Kelley Drye & Warren LLP as Special Counsel to the Debtors *Nunc Pro Tunc* to the Commencement Date [ECF No. 85]
- Application of Debtors for Authorization to Retain and Employ FTI Consulting, Inc. as Financial Advisor for Debtors *Nunc Pro Tunc* to the Commencement Date [ECF No. 86]
- Application of Debtors for Authority to Retain and Employ Weil, Gotshal & Manges LLP as Attorneys for Debtors *Nunc Pro Tunc* to Commencement Date [ECF No. 88]