

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

In re:)	
)	Chapter 11
J. C. PENNEY COMPANY, INC., <i>et al.</i> , ¹)	Case No. 20-20182 (DRJ)
)	
Debtors.)	(Jointly Administered)
)	

NOTICE OF DISCLOSURE STATEMENT HEARING

PLEASE TAKE NOTICE THAT on October 20, 2020, the Debtors filed the (i) *Joint Chapter 11 Plan of Reorganization of J.C. Penney Company, Inc. and Its Debtor Affiliates* (as may be modified, amended, or supplemented from time to time, the “Plan”); (ii) *Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of J. C. Penney Company, Inc. and Its Debtor Affiliates* (as may be modified, amended, or supplemented from time to time, the “Disclosure Statement”); and (iii) *Debtors’ Emergency Motion for Entry of an Order (I) Scheduling a Combined Disclosure Statement Approval and Plan Confirmation Hearing, (II) Conditionally Approving the Plan and Disclosure Statement Objection and Related Procedures, (III) Approving the Solicitation Procedures, and (IV) Approving the Confirmation Hearing Notice* [Docket No. 1594] (the “Disclosure Statement Motion”).²

PLEASE TAKE FURTHER NOTICE THAT a hearing (the “Disclosure Statement Hearing”) will commence before United States Bankruptcy Judge David R. Jones on **October 26, 2020, at 3:00 p.m.**, prevailing Central Time, in the United States Bankruptcy Court for the Southern District of Texas, located at Courtroom 400, 4th Floor, 515 Rusk, Houston, Texas 77002 (the “Court”), to consider the entry of an order: (a) conditionally approving the Disclosure Statement; (b) approving solicitation packages and procedures for the distribution thereof; (c) approving the form of ballot and manner of notice; (d) approving the voting record date, solicitation deadline, and voting deadline; (e) establishing notice and objection procedures for confirmation of the Plan; and (f) granting other related relief. Please be advised that the Disclosure Statement Hearing may be continued from time to time by the Court or the Debtors without further notice other than by such adjournment being announced in open court or by a notice of adjournment filed with the Court.

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <http://cases.primeclerk.com/JCPenney>. The location of Debtor J. C. Penney Company, Inc.’s principal place of business and the Debtors’ service address in these chapter 11 cases is 6501 Legacy Drive, Plano, Texas 75024.

² Capitalized terms used but not defined herein shall have the meaning given to them in the Plan, the Disclosure Statement, or the Disclosure Statement Motion, as applicable.

PLEASE TAKE FURTHER NOTICE THAT if you would like to obtain a copy of the Disclosure Statement, the Plan, or related documents, you may: (a) access the Debtors' restructuring website at: <https://cases.primeclerk.com/JCPenney>; (b) write to J. C. Penney Company, Inc. Ballot Processing, c/o Prime Clerk LLC, One Grand Central Place, 60 East 42nd Street, Suite 1440, New York, NY 10165; (c) call (877) 720-6576 (U.S.) or (646) 979-4417 (International) and request to speak with a member of the Solicitation Group; or (d) email JCPenneyBallots@primeclerk.com. You may also obtain copies of any pleadings filed in the Chapter 11 Cases for a fee via PACER at: <http://www.txs.uscourts.gov>.

PLEASE TAKE FURTHER NOTICE THAT the deadline for filing objections to the conditional approval of the Disclosure Statement and/or any other relief requested in the Disclosure Statement Motion is **October 23, 2020, at 5:00 p.m.**, prevailing Central Time. Any objections to the relief sought at the Disclosure Statement Hearing **must**: (a) be made in writing; (b) conform to the Bankruptcy Rules, the Bankruptcy Local Rules, and any orders of the Court; (c) state with particularity the legal and factual basis for the objection and if practicable, a proposed modification to the Disclosure Statement (or related materials) that would resolve such objection; and (d) be filed with the Court (contemporaneously with a proof of service) and served on or before **October 23, 2020, at 5:00 p.m.**, prevailing Central Time.

Respectfully Submitted,
October 21, 2020

/s/ Matthew D. Cavanaugh

JACKSON WALKER L.L.P.

Matthew D. Cavanaugh (TX Bar No. 24062656)
Jennifer F. Wertz (TX Bar No. 24072822)
Kristhy M. Peguero (TX Bar No. 24102776)
Veronica A. Polnick (TX Bar No. 24079148)
1401 McKinney Street, Suite 1900
Houston, Texas 77010
Telephone: (713) 752-4200
Facsimile: (713) 752-4221
Email: mcavanaugh@jw.com
jwertz@jw.com
kpeguero@jw.com
vpolnick@jw.com

Co-Counsel to the Debtors and Debtors in Possession

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP

Joshua A. Sussberg, P.C. (admitted *pro hac vice*)
Christopher Marcus, P.C. (admitted *pro hac vice*)
Aparna Yenamandra (admitted *pro hac vice*)
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-4900
Email: joshua.sussberg@kirkland.com
christopher.marcus@kirkland.com
aparna.yenamandra@kirkland.com

Co-Counsel to the Debtors and Debtors in Possession