

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

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<b>In re</b>	:	<b>Chapter 11</b>
	:	
<b>RENTPATH HOLDINGS, INC., et al.,</b>	:	<b>Case No. 20-10312 (BLS)</b>
	:	
<b>Debtors.<sup>1</sup></b>	:	<b>(Jointly Administered)</b>
	:	
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**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR  
HEARING ON JUNE 9, 2020 AT 10:00 A.M. (ET)**

**ANY PARTY WISHING TO PARTICIPATE IN THE HEARING  
MUST APPEAR THROUGH BOTH COURTCALL AND ZOOM.**

**TO APPEAR BY VIDEO CONFERENCE,  
PARTIES SHOULD USE THE FOLLOWING INFORMATION:  
JOIN ZOOMGOV HEARING: <https://debuscourts.zoomgov.com/j/1613029828>**

**MEETING ID: 161 302 9828  
PASSWORD: 720922**

**PLEASE NOTE: AUDIO MUST BE MUTED IN ZOOM ONCE CONNECTED.  
COURTCALL, LLC WILL PROVIDE THE AUDIO FOR THE HEARING.**

**TO APPEAR TELEPHONICALLY,  
PARTIES SHOULD CONTACT COURTCALL, LLC  
AT 844-925-0626 TO REGISTER THEIR APPEARANCE.**

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: RentPath Holdings, Inc. (1735); RentPath, LLC (7573); Consumer Source Holdings LLC (8150); Discover Home Network, LLC (4311); Easy Media, LLC (5455); Electronic Lead Management, Inc. (4986); Electronic Lead Management MA, Inc. (3113); Electronic Lead Management VA, Inc. (7698); Live Response Solutions Holdings, LLC (0462); Live Response Solutions, LLC (5120); Viva Group Brokerage, Inc. (7156); and Viva Group, LLC (0789). The Debtors’ mailing address is 950 East Paces Ferry Road NE, Suite 2600, Atlanta, Georgia 30326.

**I. RESOLVED MATTERS:**

1. Motion of Debtors Pursuant to 11 U.S.C. §§ 105 and 107, Fed. R. Bankr. P. 9018 and Del. Bankr. L.R. 9018-1 for Entry of an Order Authorizing the Debtors to File (I) Portions of the Creditor Matrix Under Seal and (II) the Commercial Information and the Personal Information in Future Filings Under Seal [Docket No. 7; filed February 12, 2020]

Response/Objection Deadline: March 5, 2020 at 4:00 p.m. (ET); extended to April 6, 2020 at 4:00 p.m. (ET) for the Office of the United States Trustee for the District of Delaware

Responses/Objections Received:

- A. Objection of the United States Trustee to Debtors' Motion to Seal [Docket No. 266; filed April 3, 2020]

Related Documents:

- i. Notice of Filing of Sealed Version of the Creditor Matrix (Sealed) [Docket No. 10; filed February 12, 2020]
- ii. Notice of Filing of Proposed Redacted Version of the Creditor Matrix [Docket No. 11; filed February 12, 2020]
- iii. Re-Notice of Motion of Debtors Pursuant to 11 U.S.C. §§ 105 and 107, Fed. R. Bankr. P. 9018 and Del. Bankr. L.R. 9018-1 for Entry of an Order Authorizing the Debtors to File (I) Portions of the Creditor Matrix Under Seal and (II) the Commercial Information and the Personal Information in Future Filings Under Seal [Docket No. 95; filed February 14, 2020]
- iv. Order Pursuant to 11 U.S.C. §§ 105 and 107, Fed. R. Bankr. P. 9018 and Del. Bankr. L.R. 9018-1 Authorizing the Debtors to File (I) Portions of the Creditor Matrix Under Seal and (II) the Commercial Information and the Personal Information in Future Filings Under Seal [Docket No. 367; entered May 29, 2020]

Status: On May 29, 2020, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

2. Motion of Debtors for Entry of an Order (I) Extending the Deadline by Which the Debtors May Remove Civil Actions and (II) Granting Related Relief [Docket No. 331; filed May 11, 2020]

Response/Objection Deadline: May 26, 2020 at 4:00 p.m. (ET)

Responses/Objections Received: None

Related Documents:

- i. Certificate of No Objection Regarding Motion of Debtors for Entry of an Order (I) Extending the Deadline by Which the Debtors May Remove Civil Actions and (II) Granting Related Relief [Docket No. 360; filed May 27, 2020]
- ii. Order (I) Extending the Deadline by Which the Debtors May Remove Civil Actions and (II) Granting Related Relief [Docket No. 365; entered May 29, 2020]

Status: On May 29, 2020, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

## **II. JOINT PLAN CONFIRMATION AND SALE HEARING:**

3. Modified Joint Chapter 11 Plan of RentPath Holdings, Inc. and Its Affiliated Debtors [[Docket No. 348](#); filed May 15, 2020]

Confirmation and Sale Objection Deadline: May 22, 2020 at 4:00 p.m. (ET)

Confirmation and Sale Responses/Objections Received: None

Cure Objection Deadline: May 29, 2020 at 4:00 p.m. (ET); extended to June 8, 2020 at 4:00 p.m. (ET) for Google Inc., Facebook, Inc., and Microsoft Online, Inc.; extended to June 12, 2020 at 4:00 p.m. (ET) for Fidelity Management Trust Company

Cure Responses/Objections Received:

- A. Limited Objection of Microsoft to Notice of Cure Costs and Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale Transaction [[Docket No. 362](#); filed May 29, 2020]

Status: This objection has been resolved.

- B. Limited Objection of Salesforce.com, Inc. to the Proposed Assumption and Assignment of Certain Executory Contracts and Cure Costs in Connection with the Sale of Substantially all Assets, and Reservation of Rights [[Docket No. 364](#); filed May 29, 2020]

Status: This objection has been adjourned to a date to be determined.

Related Documents:

- i. Declaration of Richard Martin in Support of Debtors' Chapter 11 Petitions and First Day Relief [[Docket No. 17](#); filed February 12, 2020]
- ii. Declaration of Carlos Jimenez in Support of Motion of Debtors for Entry of an Order (I) Approving (A) Bidding Procedures, (B) Designation of Stalking Horse Bidder and Stalking Horse Bid Protections, (C) Scheduling Auction and Sale Hearing, (D) Form and Manner of Notice of Sale, Auction, and Hearing, and (E) Assumption and Assignment Procedures and (II) Granting Related Relief [[Docket No. 82](#); filed February 13, 2020]
- iii. Order (I) Approving (A) Bidding Procedures, (B) Designation of Stalking Horse Bidder and Stalking Horse Bid Protections, (C) Scheduling Auction and Sale Hearing, (D) Form and Manner of Notice of Sale, Auction, and Sale Hearing, and (E) Assumption and Assignment Procedures and (II) Granting Related Relief [[Docket No. 172](#); filed March 10, 2020]
- iv. Notice of Sale, Bidding Procedures, Auction and Sale Hearing [[Docket No. 224](#); filed March 13, 2020]
- v. Notice of (I) Cancellation of Auction and (II) Designation of (A) Stalking Horse Bid as the Successful Bid and (B) Credit Bid as the Back-Up Bid [[Docket No. 251](#); filed March 26, 2020]
- vi. Order (I) Approving Disclosure Statement and Form and Manner of Notice of Disclosure Statement Hearing, (II) Establishing Solicitation, Voting, and Related Procedures, (III) Scheduling Confirmation Hearing, (IV) Establishing Notice and Objection Procedures for Confirmation of Plan, (V) Establishing Exit Participation Procedures, (VI) Establishing Back-Up Bid Implementation Procedures, and (VII) Granting Related Relief [[Docket No. 287](#); filed April 15, 2020]
- vii. Disclosure Statement for Joint Chapter 11 Plan of RentPath Holdings, Inc. and Its Affiliated Debtors (Solicitation Version) [[Docket No. 294](#); filed April 17, 2020]
- viii. Notice of (I) Approval of Disclosure Statement, (II) Establishment of Record Date, (III) Hearing on Confirmation of the Plan, (IV) Procedures for Objecting to the Confirmation of the Plan, and (V) Procedures and Deadline for Voting on the Plan [[Docket No. 297](#); filed April 17, 2020]
- ix. Order Amending Order (I) Approving (A) Bidding Procedures, (B) Designation of Stalking Horse Bidder and Stalking Horse Bid Protections, (C) Scheduling Auction and Sale Hearing, (D) Form and Manner of Notice of Sale, Auction, and Sale Hearing, and (E) Assumption and Assignment Procedures and (II) Granting Related Relief [[Docket No. 337](#); filed May 14, 2020]

- x. Notice of Filing of Plan Supplement to Joint Chapter 11 Plan of RentPath Holdings, Inc. and Its Affiliated Debtors (SEALED) [Docket No. 342; filed May 15, 2020]
- xi. Notice of Filing of Proposed Redacted Version of the Plan Supplement to Joint Chapter 11 Plan of RentPath Holdings, Inc. and Its Affiliated Debtors [[Docket No. 343](#); filed May 15, 2020]
- xii. Notice of Proposed Assumption or Rejection of Executory Contracts and Unexpired Leases of Debtors (SEALED) [Docket No. 344; filed May 15, 2020]
- xiii. Notice of Filing of Proposed Redacted Version of the Notice of Proposed Assumption or Rejection of Executory Contracts and Unexpired Leases of Debtors [[Docket No. 345](#); filed May 15, 2020]
- xiv. Notice of Cure Costs and Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale Transaction (SEALED) [Docket No. 346; filed May 15, 2020]
- xv. Notice of Filing of Proposed Redacted Version of the Notice of Cure Costs and Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale Transaction [[Docket No. 347](#); filed May 15, 2020]
- xvi. Notice of Filing of Redline of Modified Joint Chapter 11 Plan of RentPath Holdings, Inc. and Its Affiliated Debtors [[Docket No. 349](#); filed May 15, 2020]
- xvii. Supplemental Notice of Cure Costs and Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale Transaction [[Docket No. 374](#); filed May 29, 2020]
- xviii. Declaration of Craig E. Johnson of Prime Clerk LLC Regarding the Solicitation of Votes and Tabulation of Ballots Cast on the Joint Chapter 11 Plan of RentPath Holdings, Inc. and Its Debtor Affiliates [[Docket No. 390](#); filed June 1, 2020]
- xix. Supplemental Notice of Proposed Assumption of Executory Contracts and Unexpired Leases of Debtors [[Docket No. 393](#); filed June 2, 2020]
- xx. Notice of Filing of Amended Plan Supplement to Modified Joint Chapter 11 Plan of RentPath Holdings, Inc. and Its Affiliated Debtors [[Docket No. 394](#); filed June 2, 2020]
- xxi. Notice of Filing of Second Amended Plan Supplement to Modified Joint Chapter 11 Plan of RentPath Holdings, Inc. and Its Affiliated Debtors (SEALED) [Docket No. 402; filed June 4, 2020]

- xxii. Notice of Filing of Second Amended Plan Supplement to Modified Joint Chapter 11 Plan of RentPath Holdings, Inc. and Its Affiliated Debtors (REDACTED) [[Docket No. 403](#); filed June 4, 2020]
- xxiii. Memorandum of Law in Support of Confirmation of Modified Joint Chapter 11 Plan of RentPath Holdings, Inc. and Its Affiliated Debtors [[Docket No. 404](#); filed June 5, 2020]
- xxiv. Declaration of Richard Martin in Support of Confirmation of Modified Joint Chapter 11 Plan of RentPath Holdings, Inc. and Its Affiliated Debtors [[Docket No. 405](#); filed June 5, 2020]
- xxv. Declaration of Suwendu Pal in Support of Confirmation of Modified Joint Chapter 11 Plan of RentPath Holdings, Inc. and Its Affiliated Debtors [[Docket No. 406](#); filed June 5, 2020]
- xxvi. Declaration of Carlos Jimenez of Moelis & Company, LLC, Debtors' Investment Banker, in Support of the Sale Transaction and Confirmation of the Plan [[Docket No. 407](#); filed June 5, 2020]
- xxvii. Notice of Filing of Proposed Confirmation Order [[Docket No. 408](#); filed June 5, 2020]

Potential Witness Information:

- a. Debtor Witness: Richard Martin, Chief Financial Officer of RentPath Holdings, Inc. (testifying, if necessary, from Niantic, Connecticut)
- b. Debtor Witness: Suwendu Pal, Berkeley Research Group, LLC (testifying, if necessary, from Needham, Massachusetts)
- c. Debtor Witness: Carlos Jimenez, Moelis & Company, LLC (testifying, if necessary, from Los Angeles, California)
- d. Debtor Witness: Craig E. Johnson, Voting Declarant from Prime Clerk LLC (testifying, if necessary, from Katonach, New York)

Status: The hearing on this matter will go forward. The Debtors plan to move each of the declarations [Docket Nos. 17, 82, 390, 405, 406 and 407] of the potential witnesses into evidence and each potential witness will be available to provide live testimony, if necessary. The Debtors do not anticipate that there will be any live testimony.

Dated: June 5, 2020  
Wilmington, Delaware

/s/ Travis J. Cuomo

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RICHARDS, LAYTON & FINGER, P.A.

Daniel J. DeFranceschi (No. 2732)

Zachary I. Shapiro (No. 5103)

Megan E. Kenney (No. 6426)

Travis J. Cuomo (No. 6501)

One Rodney Square

920 N. King Street

Wilmington, Delaware 19801

Telephone: (302) 651-7700

Facsimile: (302) 651-7701

E-mail: defranceschi@rlf.com

shapiro@rlf.com

kenney@rlf.com

cuomo@rlf.com

-and-

WEIL, GOTSHAL & MANGES LLP

Ray C. Schrock, P.C. (admitted *pro hac vice*)

Andriana Georgallas (admitted *pro hac vice*)

767 Fifth Avenue

New York, New York 10153

Telephone: (212) 310-8000

Facsimile: (212) 310-8007

E-mail: ray.schrock@weil.com

andriana.georgallas@weil.com

*Attorneys for Debtors and Debtors in Possession*