

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

In re:

Chapter 11

APP WINDDOWN, LLC, *et al.*,¹

Case No. 16-12551 (BLS)

Debtors.

(Jointly Administered)

APP USA WINDDOWN, LLC,

Plaintiff,

Adv. Proc. No. 18-50427 (BLS)

vs.

SUN TRADE GROUP, INC. (d/b/a SUN
APPAREL),

Defendant.

**SECOND AMENDED² NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON NOVEMBER 28, 2018, AT 10:00 A.M. (EASTERN TIME)³**

**Hearing Location: 824 N. Market St., 6th Floor, Courtroom #1,
Wilmington, DE 19801**

Before the Honorable Brendan L. Shannon

ADJOURNED MATTER:

1. *APP USA Winddown, LLC v Sun Trade Group, Inc. (d/b/a Sun Apparel)*, Adv. 18-50427
[Filed 5/9/18]

Response Deadline: June 9, 2018

Responses Received: None.

¹ The Debtors are the following six entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): APP Winddown, LLC (f/k/a American Apparel, LLC) (0601); APP USA Winddown, LLC (f/k/a American Apparel (USA), LLC) (8940); APP Retail Winddown, Inc. (f/k/a American Apparel Retail, Inc.) (7829); APP D&F Winddown, Inc. (f/k/a American Apparel Dyeing & Finishing, Inc.) (0324); APP Knitting Winddown, LLC (f/k/a KCL Knitting, LLC) (9518); and APP Shipping Winddown, Inc. (f/k/a Fresh Air Freight, Inc.) (3870). The address of each of the Debtors is 107 Millcreek Corners, Suite B, P O Box 5129, Brandon, MS 39047.

² **Changes from the Amended Agenda filed at Docket No. 1976 are in bold.**

³ Any party who wishes to attend telephonically is required to make arrangements through CourtCall by telephone (866-582-6878) or by facsimile (866-533-2946), no later than 12:00 p.m. one business day prior to the hearing.

Related Documents:

- A. Complaint for Turnover of Property of the Estate [Filed 5/9/18] (Adv. Docket No. 1)
- B. Summons and Notice of Pretrial Conference [Filed 5/9/18] (Adv. Docket No. 2)

Status: The pretrial conference on this matter is being adjourned to a date to be determined.

- 2. Debtors' Eleventh Omnibus Objection (Substantive) to Certain (I) Insufficient Documentation Claims, (II) Misclassified Claims, and (III) Claims on Account of Equity Interests [Filed 9/14/18] (Docket No. 1875)

Response Deadline: October 9, 2018 at 4:00 p.m.

Responses Received:

- A. Response to RSGF Granada Building, LLC to Debtors' Eleventh Omnibus Objection to Its Claim [Filed 10/9/18] (Docket No. 1900)
- B. Hudson 6922 Hollywood LLC's Response to Debtors' Eleventh Omnibus Objection to Its Claim [Filed 10/9/18] (Docket No. 1902)
- C. Informal Response to AIG Property Casualty Inc.
- D. Informal Response of City & County of San Francisco Tax Collector

Related Documents:

- A. Notice of Submission of Proofs of Claim in Connection with Debtors' Eleventh Omnibus Objection (Substantive) to Certain (I) Insufficient Documentation Claims, (II) Misclassified Claims, and (III) Claims on Account of Equity Interests [Filed 10/2/18] (Docket No. 1893)
- B. [Signed] Order Granting Debtors' Eleventh Omnibus Objection (Substantive) to Certain (I) Insufficient Documentation Claims, (II) Misclassified Claims, and (III) Claims on Account of Equity Interests [Filed 10/11/18] (Docket No. 1912)

Status: This matter is being adjourned to a date to be determined with respect to the responses above. The Court has entered the order sustaining the objection with respect to the remaining claims.

CONFIRMATION:

3. Second Amended Joint Plan of Liquidation Proposed by the Debtors and Debtors in Possession [Solicitation Version] [Filed 10/16/18] (Docket No. 1928)

Response Deadline: November 21, 2018 at 4:00 p.m. Deadline extended for (i) AIG Property Casualty Inc. to November 23, 2018; (ii) the U.S. Trustee to November 26, 2018

Responses Received:

- A. Limited Objection of Illinois Department of Revenue to Confirmation of Second Amended Joint Plan of Liquidation [Filed 11/20/18] (Docket No. 1967)
- B. Objection by the United States to the Second Amended Joint Plan of Liquidation of the Debtors and Debtors in Possession [Filed 11/21/18] (Docket No. 1969)
- C. Litigation Trustee's Limited Objection to Confirmation of the Joint Plan of Liquidation Proposed by the Debtors and Debtors in Possession [Filed 11/21/18] (Docket No. 1970)
- D. Informal Response of the U.S. Trustee
- E. Informal Response of AIG Insurance Company
- F. Informal Response of the Securities and Exchange Commission

Reply Deadline: November 26, 2018 at 5:00 p.m.

Reply:

- A. Debtors' (I) Memorandum of Law in Support of Confirmation of Second Amended Joint Plan of Liquidation of the Debtors and Debtors in Possession and (II) Consolidated Reply to Certain Objections to Confirmation of Second Amended Joint Plan of Liquidation [Filed 11/26/18] (Docket No. 1974)

Related Documents:

- A. Joint Plan of Liquidation Proposed by the Debtors and Debtors in Possession [Filed 6/12/18] (Docket No. 1746)
- B. Disclosure Statement for Joint Plan of Liquidation Proposed by the Debtors and Debtors in Possession [Filed 6/12/18] (Docket No. 1747)
- C. Notice of Filing of Clean and Blackline Versions of Amended Joint Plan of

Liquidation Proposed by the Debtors and Debtors in Possession [Filed 9/7/18]
(Docket No. 1863)

- D. Notice of Filing of Clean and Blackline Versions of: Disclosure Statement for Amended Joint Plan of Liquidation Proposed by the Debtors and Debtors in Possession [Filed 9/7/18] (Docket No. 1864)
- E. Notice of Filing of Clean and Blackline Versions of Second Amended Joint Plan of Liquidation Proposed by the Debtors and Debtors in Possession [Filed 10/12/18] (Docket No. 1915)
- F. Notice of Filing of Clean and Blackline Versions of: Disclosure Statement for Second Amended Joint Plan of Liquidation Proposed by the Debtors and Debtors in Possession [Filed 10/12/18] (Docket No. 1916)
- G. [Signed] Order (I) Approving Disclosure Statement, (II) Approving the Form and Manner of Service of Disclosure Statement Notice, (III) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject Plan of Liquidation and (IV) Scheduling Hearing on Confirmation of Plan of Liquidation [Filed 10/15/18] (Docket No. 1924)
- H. Disclosure Statement for Second Amended Joint Plan of Liquidation Proposed by the Debtors and Debtors in Possession [Solicitation Version] [Filed 10/16/18] (Docket No. 1929)
- I. Notice of (A) Deadline for Casting Votes to Accept or Reject Plan of Liquidation, (B) Hearing to Consider Confirmation of Plan of Liquidation and (C) Related Matters [Filed 10/16/18] (Docket No. 1930)
- J. (I) Notice of Non-Voting Status Under Joint Plan of Liquidation Proposed by the Debtors and Debtors in Possession and (II) Release Opt-Out Form [Filed 10/16/18] (Docket No. 1931)
- K. Affidavit of Publication of Gregory R. DePalma [Filed 10/23/18] (Docket No. 1938)
- L. Notice of Plan Objection Deadlines With Respect to Insurance Policies [Filed 10/24/18] (Docket No. 1940)
- M. Notice of Filing of Plan Supplement [Filed 11/9/18] (Docket No. 1950)
- N. Declaration of Craig E. Johnson of Prime Clerk LLP Regarding the Solicitation of Votes and Tabulation of Ballots Cast on the Second Amended Joint Plan of Liquidation of the Debtors and Debtors in Possession [Filed 11/26/18] (Docket No. 1972)

O. Declaration of Bradley E. Scher in Support of Confirmation of the Second Amended Joint Plan of Liquidation of the Debtors and Debtors in Possession [Filed 11/26/18] (Docket No. 1973)

P. Notice of Filing of Changed Pages to Plan [Filed 11/27/18] (Docket No. 1980)

Q. Notice of Filing of Proposed Confirmation Order [Filed 11/27/18] (Docket No. 1979)

Status: This matter will go forward.

Dated: November 27, 2018
Wilmington, Delaware

PACHULSKI STANG ZIEHL & JONES LLP

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