

**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)

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON OCTOBER 24, 2019, AT 10:30 A.M. (EASTERN TIME)**

**Hearing Location: Before the Honorable Brendan L. Shannon, at the
U.S. Bankruptcy Court for the District of Delaware, 824 N. Market St., 6th Floor,
Courtroom #1, Wilmington, DE 19801**

**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.**

RESOLVED MATTER:

1. Motion of Creditors' Fund Trustee for an Order Extending the Claims Objection
Deadline as to Certain Claims to January 8, 2020 [Filed 9/9/19] (Docket No. 2233)

Response Deadline: September 23, 2019 at 4:00 p.m. (ET).

Responses Received:

- A. Omnibus Response of Charney and Kowalewski to Debtors' and Creditors'
Fund Trustee's Motions to Extend Claims Objection Deadline [Filed 9/19/19]
(Docket No. 2240)

Related Documents:

- A. Certification of No Objection Regarding Motion of Creditors' Fund Trustee
for an Order Extending the Claims Objection Deadline as to Certain Claims to
January 8, 2020 [Filed 9/24/19] (Docket No. 2241)
- B. [Signed] Order Extending the Claims Objection Deadline as to Certain Claims

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.

to January 8, 2020 [Filed 9/25/19] (Docket No. 2242)

Status: The order on this matter has been entered by the Court and it is now resolved.

UNCONTESTED MATTERS UNDER CNO/COC:

2. Post-Confirmation Debtors' Thirteenth Omnibus Objection (Substantive) to Certain Secured Landlord Claims and Claims Relating to the 363 Grant Ave. Store [Filed 9/10/19] (Docket No. 2235)

Response Deadline: October 10, 2019 at 4:00 p.m. (ET). Extended for RS JZ Bedford – N 6th LLC to October 21, 2019 at 4:00 p.m. (ET).

Responses Received:

- A. Informal response from RS JZ Bedford – N 6th LLC

Related Documents:

- A. Notice of Submission of Proofs of Claim in Connection with Post-Confirmation Debtors' Thirteenth Omnibus Objection (Substantive) to Certain Secured Landlord Claims and Claims Relating to the 363 Grant Ave. Store [Filed 10/10/19] (Docket No. 2246)
- B. Certification of Counsel Regarding Post-Confirmation Debtors' Thirteenth Omnibus Objection (Substantive) to Certain Secured Landlord Claims and Claims Relating to the 363 Grant Ave. Store [To Be Filed]

Status: A revised form of order resolving the informal comments received from RS JZ Bedford – N 6th LLC will be submitted under certification of counsel for the Court's consideration prior to the hearing.

3. Motion of the Post-Confirmation Debtors to Extend the Claims Objection Deadline [Filed 9/10/19] (Docket No. 2236)

Response Deadline: October 10, 2019 at 4:00 p.m. (ET).

Responses Received:

- A. Omnibus Response of Charney and Kowalewski to Debtors' and Creditors' Fund Trustee's Motions to Extend Claims Objection Deadline [Filed 9/19/19] (Docket No. 2240)

Related Documents:

- A. Certification of No Objection Regarding Motion of the Post-Confirmation Debtors to Extend the Claims Objection Deadline [Filed 10/22/19] (Docket

No. 2248)

Status: As stated in their omnibus response, Charney and Kowalewski do not object to the relief requested in the Motion. A certification of no objection has been filed and counsel respectfully requests entry of the proposed form of order at the Court's convenience.

Dated: October 22, 2019
Wilmington, Delaware

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Timothy P. Cairns
Laura Davis Jones (DE Bar No. 2436)
James E. O'Neill (DE Bar No. 4042)
Timothy P. Cairns (DE Bar No. 4228)
919 N. Market Street, 17th Floor
P.O. Box 8705
Wilmington, DE 19899-8705 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: ljones@pszjlaw.com
joneill@pszjlaw.com
tcairns@pszjlaw.com

and

JONES DAY
Scott J. Greenberg
Michael J. Cohen
250 Vesey Street
New York, NY 10281
Telephone: (212) 326-3939
Facsimile: (212) 755-7306
Email: sgreenberg@jonesday.com
mcohen@jonesday.com

Co-Counsel for the Debtors
and Debtors-in-Possession