

**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)

**AMENDED² NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON DECEMBER 18, 2019, AT 1:00 P.M. (EASTERN TIME)**

***PLEASE TAKE NOTICE, AS THERE ARE NO MATTERS GOING
FORWARD, THE COURT HAS CANCELED THIS HEARING.***

UNCONTESTED MATTERS UNDER COC:

1. Creditors' Fund Trustee's Eighth Omnibus (Substantive) Objection to Certain (A) Overstated Claims; and (B) No Liability Claims [Filed 11/18/19] (Docket No. 2263)

Response Deadline: December 2, 2019 at 4:00 p.m. (ET).³

Response Received:

- A. Informal response of AIG Property Casualty Inc.

Related Documents:

- A. Notice of Submission of Proof of Claim Regarding Creditors' Fund Trustee's Eighth Omnibus (Substantive) Objection to Certain (A) Overstated Claims; and (B) No Liability Claims [Filed 12/4/19] (Docket No. 2269)
- B. Certification of Counsel Regarding Creditors' Fund Trustee's Eighth Omnibus (Substantive) Objection to Certain (A) Overstated Claims; and (B) No Liability

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 **Amended items noted in bold.**

³ The Response Deadline was extended through and including December 10, 2019 solely with respect to AIG Property Casualty Inc.

Claims [Filed 12/16/19] (Docket No. 2276)

- C. **[Signed] Order Sustaining Creditors' Fund Trustee's Eighth Omnibus (Substantive) Objection to Certain (A) Overstated Claims; and (B) No Liability Claims [Filed 12/16/19] (Docket No. 2280)**

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

2. Creditors' Fund Trustee's Ninth Omnibus (Non-Substantive) Objection to Certain (A) Duplicative Claims; (B) Amended and Superseded Claims; (C) Late Filed Claims; and (D) Insufficient Documentation Claims [Filed 11/18/19] (Docket No. 2264)

Response Deadline: December 2, 2019 at 4:00 p.m. (ET).

Response Received:

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

Related Documents:

- A. Notice of Submission of Proof of Claim Regarding Creditors' Fund Trustee's Ninth Omnibus (Non-Substantive) Objection to Certain (A) Duplicative Claims; (B) Amended and Superseded Claims; (C) Late Filed Claims; and (D) Insufficient Documentation Claims [Filed 12/4/19] (Docket No. 2270)
- B. Certification of Counsel Regarding Creditors' Fund Trustee's Ninth Omnibus (Non-Substantive) Objection to Certain (A) Duplicative Claims; (B) Amended and Superseded Claims; (C) Late Filed Claims; and (D) Insufficient Documentation Claims [Filed 12/16/19] (Docket No. 2277)
- C. **[Signed] Order Sustaining Creditors' Fund Trustee's Ninth Omnibus (Non-Substantive) Objection to Certain (A) Duplicative Claims; (B) Amended and Superseded Claims; (C) Late Filed Claims; and (D) Insufficient Documentation Claims [Filed 12/16/19] (Docket No. 2281)**

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

CONTESTED MATTER GOING FORWARD:

3. Motion for Final Decree Closing the Chapter 11 Cases Filed by APP Winddown, LLC [Filed 11/22/19] (Docket No. 2266)

Response Deadline: December 6, 2019 at 4:00 p.m. (ET).

Responses Received:

- A. Objection to Debtors' Motion for Entry of Final Decree Closing the Chapter 11

Cases Filed by the Litigation Trustee[Filed 12/5/19] (Docket No. 2271)

- B. Objection of Dov Charney and Adrian Kowalewski to Motion for Entry of Final Decree Closing the Chapter 11 Cases [Filed 12/6/19] (Docket No. 2272)
- C. Reservation of Rights of Creditors' Fund Trustee Regarding Motion for Entry of Final Decree Closing The Chapter 11 Cases [Filed 12/6/19] (Docket No. 2273)
- D. Response of Charney and Kowalewski to Opposition of Litigation Trustee to Debtors' Motion for Entry of Final Decree Closing the Chapter 11 Cases [Filed 12/13/19] (Docket No. 2274)

Reply:

- A. Debtors' Omnibus Reply in Support of its Motion for Entry of Final Decree Closing the Chapter 11 Cases [Filed 12/13/19] (Docket No. 2275)

Related Documents: None.

Status: By agreement of the parties, this matter is being adjourned to a hearing date and time to be determined.

Dated: December 17, 2019
Wilmington, Delaware

PACHULSKI STANG ZIEHL & JONES LLP

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