

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

In re:	:	
	:	Chapter 11
AMERICAN APPAREL, LLC, <i>et al.</i> , ¹	:	
Debtors.	:	Case No. 16-12551 (BLS)
	:	
	:	(Jointly Administered)
	:	

**SECOND AMENDED² NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON DECEMBER 12, 2016, AT 12:00 P.M. (EASTERN TIME)³**

Please note: The time of the hearing has been changed from 1:00 p.m. to 12:00 p.m.

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

Before the Honorable: Brendan L. Shannon

RESOLVED MATTERS:

1. Motion of the Debtors for an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Filed 11/21/16] (Docket No. 141)
Response Deadline: December 5, 2016 at 4:00 p.m.

Responses Received:

- A. Informal comments from the United States Trustee

Related Documents:

- A. Certification of Counsel Regarding Motion of the Debtors for an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Filed 12/7/16] (Docket No. 247)

¹ The Debtors are the following six entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): American Apparel, LLC (0601); American Apparel (USA), LLC (8940); American Apparel Retail, Inc. (7829); American Apparel Dyeing & Finishing, Inc. (0324); KCL Knitting, LLC (9518); and Fresh Air Freight, Inc. (3870). The address of each of the Debtors is 747 Warehouse Street, Los Angeles, California, 90021.

² Amended items appear 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.

- B. [Signed] Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Filed 12/8/16] (Docket No. 263)

Status: An order has been entered and this matter is resolved.

2. Application of the Debtors for an Order Authorizing them to Retain and Employ Resources Connection, LLC D/B/A Resources Global Professionals as Consultants to the Debtors, *Nunc Pro Tunc* to the Petition Date [Filed 11/21/16] (Docket No. 142)

Response Deadline: December 5, 2016 at 4:00 p.m.

Responses Received:

- A. Informal comments from the United States Trustee

Related Documents:

1. Certification of Counsel Regarding Application of the Debtors for an Order Authorizing them to Retain and Employ Resources Connection, LLC D/B/A Resources Global Professionals as Consultants to the Debtors, *Nunc Pro Tunc* to the Petition Date [Filed 12/7/16] (Docket No. 248)
2. [Signed] Order Authorizing the Debtors to Retain and Employ Resources Connection, LLC d/b/a Resources Global Professionals as Consultants to the Debtors, *Nunc Pro Tunc* to the Petition Date [Filed 12/8/16] (Docket No. 261)

Status: An order has been entered and this matter is resolved.

3. Motion of the Debtors for an Order (I) Authorizing the Retention and Payment, *Nunc Pro Tunc* as of the Petition Date, of Professionals Utilized by the Debtors in the Ordinary Course of Business and (II) Granting Certain Related Relief [Filed 11/21/16] (Docket No. 144)

Response Deadline: December 5, 2016 at 4:00 p.m.

Responses Received:

- A. Informal comments from the United States Trustee

Related Documents:

- A. Certification of Counsel Regarding Motion of the Debtors for an Order (I) Authorizing the Retention and Payment, *Nunc Pro Tunc* as of the Petition Date, of Professionals Utilized by the Debtors in the Ordinary Course of Business and (II) Granting Certain Related Relief [Filed 12/7/16] (Docket No. 249)

- B. [Signed] Order (I) Authorizing the Retention and Payment, *Nunc Pro Tunc* as of the Petition Date, of Professionals Utilized by the Debtors in the Ordinary Course of Business and (II) Granting Related Relief [Filed 12/8/16] (Docket No. 260)

Status: An order has been entered and this matter is resolved.

- 4. Application of the Debtors Pursuant to 11 U.S.C. § 328(a), Fed. R. Bankr. P. 2014 and 5002, and Del. Bankr. L.R. 2014-1 and 2016-2(h), for Entry of an Order (I) Authorizing Employment and Retention of Houlihan Lokey Capital, Inc. As Investment Banker for the Debtors *Nunc Pro Tunc* to the Petition Date and (II) Modifying Certain Information Requirements of Del. Bankr. L.R. 2016-2 [Filed 11/22/16] (Docket No. 149)

Response Deadline: December 5, 2016 at 4:00 p.m.

Responses Received:

- A. Informal comments from the United States Trustee

Related Documents:

- A. Certification of Counsel Regarding Application of the Debtors Pursuant to 11 U.S.C. § 328(a), Fed. R. Bankr. P. 2014 and 5002, and Del. Bankr. L.R. 2014-1 and 2016-2(h), for Entry of an Order (I) Authorizing Employment and Retention of Houlihan Lokey Capital, Inc. As Investment Banker for the Debtors *Nunc Pro Tunc* to the Petition Date and (II) Modifying Certain Information Requirements of Del. Bankr. L.R. 2016-2 [Filed 12/7/16] (Docket No. 250)
- B. [Signed] Order Authorizing Retention and Employment of Houlihan Lokey Capital, Inc. as Investment Banker to the Debtors *Nunc Pro Tunc* to Petition Date [Filed 12/8/16] (Docket No. 259)

Status: An order has been entered and this matter is resolved.

- 5. Motion of Debtors to Employ and Retain Berkeley Research Group, LLC to Provide a Chief Restructuring Officer and Additional Personnel for the Debtors Pursuant to 11 U.S.C. § 363(b), *Nunc Pro Tunc* to the Petition Date [Filed 11/23/16] (Docket No. 160)

Response Deadline: December 5, 2016 at 4:00 p.m.

Responses Received:

- A. Informal comments from the United States Trustee

Related Documents:

- A. Certification of Counsel Regarding Motion of Debtors to Employ and Retain Berkeley Research Group, LLC to Provide a Chief Restructuring Officer and Additional Personnel for the Debtors Pursuant to 11 U.S.C. § 363(b), *Nunc Pro Tunc* to the Petition Date [Filed 12/7/16] (Docket No. 251)
- B. [Signed] Order Authorizing and Approving Employment and Retention of Berkeley Research Group, LLC to Provide a Chief Restructuring Officer and Additional Personnel for the Debtors, *Nunc Pro Tunc* to the Petition Date [Filed 12/8/16] (Docket No. 258)

Status: An order has been entered and this matter is resolved.

UNCONTESTED MATTERS UNDER CNO/COC:

- 6. First Omnibus Motion for Entry of an Order Authorizing the Debtors to (I) Reject Certain Unexpired Leases and Executory Contracts *Nunc Pro Tunc* to the Petition Date, and (II) Abandon Any Personal Property that Remains at the Leased Premises [Filed 11/14/16] (Docket No. 7)

Response Deadline: December 5, 2016 at 4:00 p.m.

Responses Received: None.

Related Documents:

- A. Certification of No Objection Regarding First Omnibus Motion for Entry of an Order Authorizing the Debtors to (I) Reject Certain Unexpired Leases and Executory Contracts *Nunc Pro Tunc* to the Petition Date, and (II) Abandon Any Personal Property that Remains at the Leased Premises [Filed 12/7/16] (Docket No. 245)
- B. **[Signed] Order Authorizing the Debtors to (I) Reject Certain Unexpired Leases and Executory Contracts *Nunc Pro Tunc* to the Petition Date, and (II) Abandon any Personal Property that Remains at the Leased Premises [Filed 12/9/16] (Docket No. 285)**

Status: An order has been entered and this matter is resolved.

7. Debtors' Motion for Entry of an Order (I) Extending Time to File Schedules of Assets and Liabilities, Schedules of Executory Contracts and Unexpired Leases, and Statements of Financial Affairs, (II) Extending Time to File Reports of Financial Information or to Seek Modification of Such Reporting Requirement, and (III) Granting Related Relief [Filed 11/14/16] (Docket No. 9)

Response Deadline: December 5, 2016 at 4:00 p.m.

Responses Received: None.

Related Documents:

- A. Certification of No Objection Regarding Debtors' Motion for Entry of an Order (I) Extending Time to File Schedules of Assets and Liabilities, Schedules of Executory Contracts and Unexpired Leases, and Statements of Financial Affairs, (II) Extending Time to File Reports of Financial Information or to Seek Modification of Such Reporting Requirement, and (III) Granting Related Relief [Filed 12/7/16] (Docket No. 243)
- B. [Signed] Order (I) Extending Time to File Schedules of Assets and Liabilities, Schedules of Executory Contracts and Unexpired Leases, and Statements of Financial Affairs, (II) Extending Time to File Reports of Financial Information or to Seek Modification of Such Reporting Requirement, and (III) Granting Related Relief [Filed 12/9/16] (Docket No. 291)**

Status: **An order has been entered and this matter is resolved.**

8. Motion for Interim and Final Orders (I) Approving the Continued Use of the Debtors' Cash Management System, Bank Accounts and Business Forms, (II) Approving on an Interim Basis, the Debtors' Deposit Guidelines and Extending Time to Comply with Section 345(b) of the Bankruptcy Code, (III) Approving Continuation of Ordinary Course Inter-Debtor Transactions, and (IV) Granting Related Relief [Filed 11/14/16] (Docket No. 13)

Response Deadline: December 5, 2016 at 4:00 p.m.

Responses Received: None.

Related Documents:

- A. [Signed] Interim Order (I) Approving the Continued Use of the Debtors' Cash Management System, Bank Accounts and Business Forms, (II) Approving, on an Interim Basis, the Debtors' Deposit Guidelines and Extending Time to Comply with Section 345(b) of the Bankruptcy Code, (III) Approving Continuation of Ordinary Course Inter-Debtor Transactions and (IV) Granting Related Relief [Filed 11/15/16] (Docket No. 66)
- B. Certification of Counsel Regarding Motion for Interim and Final Orders (I) Approving the Continued Use of the Debtors' Cash Management System, Bank Accounts and Business Forms, (II) Approving on an Interim Basis, the Debtors' Deposit Guidelines and Extending Time to Comply with Section 345(b) of the Bankruptcy Code, (III) Approving Continuation of Ordinary Course Inter-Debtor Transactions, and (IV) Granting Related Relief [Filed 12/8/16] (Docket No. 256)
- C. **[Signed] Order (FINAL) (I) Approving the Continued Use of the Debtors' Cash Management System, Bank Accounts and Business Forms, (II) Approving on an Interim Basis, the Debtors' Deposit Guidelines and Extending Time to Comply with Section 345(b) of the Bankruptcy Code, (III) Approving Continuation of Ordinary Course Inter-Debtor Transactions, and (IV) Granting Related Relief [Filed 12/9/16] (Docket No. 290)**

Status: An order has been entered and this matter is resolved.

- 9. Motion for Entry of Interim and Final Orders (I) Establishing Notice and Objection Procedures for Transfers of Equity Securities, and (II) Establishing a Record Date for Notice and Sell-Down Procedures for Trading in Claims Against the Debtors' Estates [Filed 11/14/16] (Docket No. 16)

Response Deadline: December 5, 2016 at 4:00 p.m.

Responses Received: None.

Related Documents:

- A. [Signed] Interim Order (I) Establishing Notice and Objection Procedures for Transfers of Equity Securities, (II) Establishing a Record Date for Notice and Sell-Down Procedures for Trading in Claims Against the Debtors' Estates and (III) Scheduling a Final Hearing [Filed 11/15/16] (Docket No. 70)
- B. Certification of No Objection Regarding Motion for Entry of Interim and Final Orders (I) Establishing Notice and Objection Procedures for

Transfers of Equity Securities, and (II) Establishing a Record Date for Notice and Sell-Down Procedures for Trading in Claims Against the Debtors' Estates [Filed 12/7/16] (Docket No. 246)

C. [Signed] Order (FINAL) (I) Establishing Notice and Objection Procedures for Transfers of Equity Securities, (II) Establishing a Record Date for Notice and Sell-Down Procedures for Trading in Claims Against the Debtors' Estates and (III) Granting Related Relief [Filed 12/9/16] (Docket No. 289)

Status: An order has been entered and this matter is resolved.

10. Debtors' Application for an Order Authorizing Employment and Retention of Prime Clerk LLC as Administrative Advisor *Nunc Pro Tunc* to the Petition Date [Filed 11/21/16] (Docket No. 143)

Response Deadline: December 5, 2016 at 4:00 p.m.

Responses Received: None.

Related Documents:

- A. Certification of No Objection Regarding Debtors' Application for an Order Authorizing Employment and Retention of Prime Clerk LLC as Administrative Advisor *Nunc Pro Tunc* to the Petition Date [Filed 12/7/16] (Docket No. 244)

Status: The Debtors have filed a certification of no objection. No hearing is necessary.

11. Debtors' Application Pursuant to Section 327(a) of the Bankruptcy Code, Rule 2014 of the Federal Rules of Bankruptcy Procedure and Local Rule 2014-1 for Authorization to Employ and Retain Pachulski Stang Ziehl & Jones LLP as Co-Counsel and Conflicts Counsel for the Debtors and Debtors In Possession *Nunc Pro Tunc* to the Petition Date [Filed 11/21/16] (Docket No. 145)

Response Deadline: December 5, 2016 at 4:00 p.m.

Responses Received:

- A. Informal comments from the United States Trustee

Related Documents:

- A. Certification of No Objection Regarding Debtors' Application Pursuant to Section 327(a) of the Bankruptcy Code, Rule 2014 of the Federal Rules of Bankruptcy Procedure and Local Rule 2014-1 for Authorization to Employ and Retain Pachulski Stang Ziehl & Jones LLP as Co-Counsel and Conflicts Counsel for the Debtors and Debtors In Possession *Nunc Pro Tunc* to the Petition Date [Filed 12/8/16] (Docket No. 255)
- B. [Signed] Order Authorizing the Employment and Retention of Pachulski Stang Ziehl & Jones LLP as Co-Counsel and Conflicts Counsel for the Debtors and Debtors in Possession *Nunc Pro Tunc* to the Petition Date [Filed 12/9/16] (Docket No. 288)**

Status: **An order has been entered and this matter is resolved.**

- 12. Application of the Debtors for an Order Authorizing them to Retain and Employ Jones Day as Counsel, *Nunc Pro Tunc* as of the Petition Date [Filed 11/21/16] (Docket No. 146)

Response Deadline: December 5, 2016 at 4:00 p.m. Extended for the United States Trustee to December 8, 2016 at 12:00 p.m.

Responses Received:

- A. Informal comments from the United States Trustee

Related Documents:

- A. Supplemental Disclosure of Compensation of Jones Day [Filed 12/8/16] (Docket No. 257)
- B. Certification of Counsel Regarding Application of the Debtors for an Order Authorizing them to Retain and Employ Jones Day as Counsel, *Nunc Pro Tunc* as of the Petition Date [Filed 12/8/16] (Docket No. 262)

C. [Signed] Order Authorizing the Debtors to Retain and Employ Jones Day as Counsel, Nunc Pro Tunc as of the Petition Date [Filed 12/9/16] (Docket No. 287)

Status: **An order has been entered and this matter is resolved.**

13. Motion for Interim and Final Orders Establishing Adequate Assurance Procedures With Respect to Debtors' Utility Providers [Filed 11/14/16] (Docket No. 5)

Response Deadline: December 5, 2016 at 4:00 p.m. Extended for Duke Energy to December 6, 2016 at 4:00 p.m. and for Certain Utility Companies to December 14, 2016 at 4:00 p.m.

Responses Received:

- A. NW Natural's Request and Motion for Order Determining Adequate Assurance of Payment to Utility Companies Filed by Northwest Natural Gas Company [Filed 11/28/16] (Docket No. 169)
- B. Objection of Certain Utility Companies to the Motion For Interim and Final Orders Establishing Adequate Assurance Procedures With Respect To Debtors' Utility Providers Filed by Commonwealth Edison Company, Georgia Power Company, NStar Electric & Gas Corporation, Orlando Utilities Commission, Public Service Electric and Gas Company, Salt River Project and Southern California [Filed 12/2/16] (Docket No. 199)
- C. Informal response of Duke Energy

Related Documents:

- A. [Signed] Interim Order Establishing Adequate Assurance Procedures with Respect to Debtors' Utility Providers [Filed 11/15/16] (Docket No. 68)
- B. Certification of Counsel Regarding Motion for Interim and Final Orders Establishing Adequate Assurance Procedures With Respect to Debtors' Utility Providers [Filed 12/8/16] (Docket No. 271)
- C. **[Signed] Final Order Establishing Adequate Assurance Procedures with Respect to the Debtors' Utility Providers [Filed 12/9/16] (Docket No. 286)**

Status: This matter is resolved with respect to the responses of Northwest Natural Gas Company and Duke Energy. This matter with respect to Certain Utility Companies is adjourned to the hearing set for December 19, 2016 at 10:30 a.m. **An order has been entered and this matter is resolved.**

CONTESTED MATTERS GOING FORWARD:

14. Debtors' Motion for an Order Establishing Procedures for (I) the Rejection of Executory Contracts and Unexpired Leases of Nonresidential Real Property, and (II) the Abandonment of Any Personal Property that Remains on the Premises [Filed 11/14/16] (Docket No. 8)

Response Deadline: December 5, 2016 at 4:00 p.m. Extended for Certain Landlords to December 7, 2016 at 12:00 p.m.

Responses Received:

- A. Informal comments from Certain Landlords
- B. Informal comments from the United States Trustee

Related Documents: None.

Status: The informal comments from the United States Trustee and Certain Landlords have been resolved. A revised form of order will be submitted under certification of counsel.

15. Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Senior Secured Superpriority Financing Pursuant to 11 U.S.C. §§ 361, 362, 363(c), 363(e), 364(c), 364(d)(1), 364(e) and 507 and (B) Utilize Cash Collateral, (II) Granting Priming Liens, Priority Liens and Superpriority Claims to the DIP Secured Parties, (III) Granting Adequate Protection to Prepetition Secured Parties, (IV) Scheduling a Final Hearing Pursuant to Rules 4001(b) and (c) Of the Bankruptcy Rules and (V) Granting Related Relief [Filed 11/14/16] (Docket No. 17)

Response Deadline: December 5, 2016 at 4:00 p.m. Extended for Certain Landlords and the Official Committee of Unsecured Creditors to December 7, 2016 at 12:00 p.m.

Responses Received:

- A. Limited Objection of the Official Committee of Unsecured Creditors to Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Senior Secured Superpriority Financing Pursuant to 11 U.S.C. §§ 361, 362, 363(c), 363(e), 364(c), 364(d)(1), 364(e) and 507 and (B) Utilize Cash Collateral, (II) Granting Priming Liens, Priority Liens and Superpriority Claims to the DIP Secured Parties, (III) Granting Adequate Protection to Prepetition Secured Parties, (IV) Scheduling a Final Hearing Pursuant to Rules 4001(b) and (c) of the Bankruptcy Rules and (V) Granting Related Relief [Filed 12/7/16] (Docket No. 238)

Reply Deadline: December 9, 2016 at 12:00 p.m.

Replies Received:

- A. Reply of Standard General to the Limited Objection of the Official Committee of Unsecured Creditors to Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Senior Secured Superpriority Financing Pursuant to 11 U.S.C. §§ 361, 362, 363(c), 363(e), 364(c), 364(d)(1), 364(e) and 507 and (B) Utilize Cash Collateral, (II) Granting Priming Liens, Priority Liens and Superpriority Claims to the DIP Secured Parties, (III) Granting Adequate Protection to Prepetition Secured Parties, (IV) Scheduling a Final Hearing Pursuant to Rules 4001(b) and (c) of the Bankruptcy Rules and (V) Granting Related Relief [Filed 12/8/16] (Docket No. 275)
 - a. Standard General L.P.s Motion for an Order Granting Standard General L.P. Leave and Permission to File Standard General L.P.S Reply to the Limited Objection of the Official Committee of Unsecured Creditors to the Debtors DIP Financing Motion [Filed 12/8/16] (Docket No. 277)

- B. Debtors' Reply to the Limited Objection of the Official Committee of Unsecured Creditors to Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Senior Secured Superpriority Financing Pursuant to 11 U.S.C. §§ 361, 362, 363(c), 363(e), 364(c), 364(d)(1), 364(e) and 507 and (B) Utilize Cash Collateral, (II) Granting Priming Liens, Priority Liens and Superpriority Claims to the DIP Secured Parties, (III) Granting Adequate Protection to Prepetition Secured Parties, (IV) Scheduling a Final Hearing Pursuant to Rules 4001(b) and (c) of the Bankruptcy Rules and (V) Granting Related Relief [Filed 12/9/16] (Docket No. 281)

Related Documents:

- A. Declaration of Mark Weinsten in Support of the Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Senior Secured Superpriority Financing Pursuant to 11 U.S.C. §§ 361, 362, 363(c), 363(e), 364(c), 364(d)(1), 364(e) and 507 and (B) Utilize Cash Collateral, (II) Granting Priming Liens, Priority Liens and Superpriority Claims to the DIP Secured Parties, (III) Granting Adequate Protection to Prepetition Secured Parties, (IV) Scheduling a Final Hearing Pursuant to Rules 4001(b) and (c) Of the Bankruptcy Rules and (V) Granting Related Relief [Filed 11/14/16] (Docket No. 18)

- B. Declaration of Saul E. Burian in Support of Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Senior Secured Superpriority Financing Pursuant to 11 U.S.C. §§ 361,

362, 363(c), 363(e), 364(c), 364(d)(1), 364(e) and 507 and (B) Utilize Cash Collateral, (II) Granting Priming Liens, Priority Liens and Superpriority Claims to the DIP Secured Parties, (III) Granting Adequate Protection to Prepetition Secured Parties, (IV) Scheduling a Final Hearing Pursuant to Rules 4001(b) and (c) Of the Bankruptcy Rules and (V) Granting Related Relief [Filed 11/14/16] (Docket No. 19)

- C. [REDACTED] Declaration of Beth D. Vogel in Support of Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Senior Secured Superpriority Financing Pursuant to 11 U.S.C. §§ 361, 362, 363(c), 363(e), 364(c), 364(d)(1), 364(e) and 507 and (B) Utilize Cash Collateral, (II) Granting Priming Liens, Priority Liens and Superpriority Claims to the DIP Secured Parties, (III) Granting Adequate Protection to Prepetition Secured Parties, (IV) Scheduling a Final Hearing Pursuant to Rules 4001(b) and (c) Of the Bankruptcy Rules and (V) Granting Related Relief [Filed 11/14/16] (Docket No. 20)
- D. [SEALED] Declaration of Beth D. Vogel in Support of Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Senior Secured Superpriority Financing Pursuant to 11 U.S.C. §§ 361, 362, 363(c), 363(e), 364(c), 364(d)(1), 364(e) and 507 and (B) Utilize Cash Collateral, (II) Granting Priming Liens, Priority Liens and Superpriority Claims to the DIP Secured Parties, (III) Granting Adequate Protection to Prepetition Secured Parties, (IV) Scheduling a Final Hearing Pursuant to Rules 4001(b) and (c) Of the Bankruptcy Rules and (V) Granting Related Relief [Filed 11/14/16] (Docket No. 22)
- E. Notice of Filing of Corrected Exhibit A to Proposed Interim Order to Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Senior Secured Superpriority Financing Pursuant to 11 U.S.C. §§ 361, 362, 363(c), 363(e), 364(c), 364(d)(1), 364(e) and 507 and (B) Utilize Cash Collateral, (II) Granting Priming Liens, Priority Liens and Superpriority Claims to the DIP Secured Parties, (III) Granting Adequate Protection to Prepetition Secured Parties, (IV) Scheduling a Final Hearing Pursuant to Rules 4001(b) and (c) of the Bankruptcy Rules and (V) Granting Related Relief [Filed 11/14/16] (Docket No. 32)
- F. [Signed] Interim Order (I) Authorizing the Debtors to (A) Obtain Post-Petition Senior Secured Superpriority Financing and (B) Utilize Cash Collateral, (II) Granting Priming Liens, Priority Lines and Superpriority Claims to the DIP Secured Parties, (III) Granting Adequate Protection to Prepetition Secured Parties, (IV) Scheduling a Final Hearing and (V) Granting Related Relief [Filed 11/17/16] (Docket No. 114)
- G. Supplemental Declaration in Support of Mark Weinsten of the Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A)

Obtain Postpetition Senior Secured Superpriority Financing Pursuant to 11 U.S.C. §§ 361, 362, 363(c), 363(e), 364(c), 364(d)(1), 364(e) and 507 and (B) Utilize Cash Collateral, (II) Granting Priming Liens, Priority Liens and Superpriority Claims to the DIP Secured Parties, (III) Granting Adequate Protection to Prepetition Secured Parties, (IV) Scheduling a Final Hearing Pursuant to Rules 4001(b) and (c) of the Bankruptcy Rules and (V) Granting Related Relief [Filed 12/9/16] (Docket No. 282)

H. Notice of Filing of Clean and Blackline Versions of Final Order (I) Authorizing the Debtors to (A) Obtain Post-Petition Senior Secured Superpriority Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 363(c), 363(e), 364(c), 364(d)(1), 364(e) and 507 and (B) Utilize Cash Collateral, (II) Granting Priming Liens, Priority Liens and Superpriority Claims to the DIP Secured Parties, (III) Granting Adequate Protection to Prepetition Secured Parties and (IV) Granting Related Relief [Filed 12/9/16] (Docket No. 283)

I. Notice of Filing of Clean and Blackline Versions of Final Order (I) Authorizing the Debtors to (A) Obtain Post-Petition Senior Secured Superpriority Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 363(c), 363(e), 364(c), 364(d)(1), 364(e) and 507 and (B) Utilize Cash Collateral, (II) Granting Priming Liens, Priority Liens and Superpriority Claims to the DIP Secured Parties, (III) Granting Adequate Protection to Prepetition Secured Parties and (IV) Granting Related Relief [Filed 12/11/16] (Docket No. 294)

Status: This matter will be going forward.

16. Debtors' Motion for Entry of an Order Pursuant to Section 365(d)(4) of the Bankruptcy Code Extending the Time within which the Debtors Must Assume or Reject Unexpired Leases of Nonresidential Real Property [Filed 11/21/16] (Docket No. 140)

Response Deadline: December 5, 2016 at 4:00 p.m. Extended for Certain Landlords to December 7, 2016 at 12:00 p.m.

Responses Received:

- A. Informal comments from Certain Landlords
- B. Limited Response to Debtors' Motion For Entry Of An Order Pursuant To Extend Time To Assume Or Reject Leases Filed by Bienes Racies Daniel, SA [Filed 12/5/16] (Docket No. 213)
- C. Objection of 60G 121 Spring Street LLC to Debtors' Motion for Entry of an Order Pursuant to Section 365(d)(4) of the Bankruptcy Code Extending the Time Within Which the Debtors Must Assume or Reject Unexpired Leases of Nonresidential Real Property [Filed 12/5/16] (Docket No. 217)

- D. Objection to Debtors Motion for Entry of an Order Pursuant to Section 365(d)(4) of the Bankruptcy Code Extending the Time Within Which the Debtors Must Assume or Reject Unexpired Leases of Nonresidential Real Property and Cross-Motion to Limit the Time Within Which the Debtors May Assume or Reject the Lease of RS JZ Bedford, - 6th, LLC Pursuant to 11 U.S.C. § 365(d)(2) [Filed 12/5/16] (Docket No. 219)
- a. Certification of Jonathan Bernstein, Pursuant to 28 U.S.C. § 1746, in Support of the Objection Of RS JZ Bedford N 6th, LLC to the Debtors Motion for Entry of an Order Pursuant to Section 365(d)(4) of the Bankruptcy Code Extending the Time Within Which the Debtors Must Assume or Reject Unexpired Leases of Nonresidential Real Property [Filed 12/5/16] (Docket No. 220)
- E. Opposition of Allan Sebanc to Debtors' Motion for Entry of an Order Pursuant to Section 365(d)(4) of the Bankruptcy Code Extending the Time within which the Debtors Must Assume or Reject Unexpired Leases of Nonresidential Real Property [Filed 12/5/16] (Docket No. 229)
- F. Objection to Debtors' Motion for Entry of an Order Pursuant to Section 365(d)(4) of the Bankruptcy Code Extending the Time within which the Debtors Must Assume or Reject Unexpired Leases of Nonresidential Real Property Filed by Deepwater Investment Group [Filed 12/6/16] (Docket No. 237)
- G. Debtors' (I) Response to Objection to Debtors Motion for Entry of an Order Pursuant to Section 365(d)(4) of the Bankruptcy Code Extending the Time Within Which the Debtors Must Assume or Reject Unexpired Leases of Nonresidential Real Property and Cross-Motion to Limit the Time Within Which the Debtors May Assume or Reject the Lease of RS JZ Bedford 6th LLC Pursuant to 11 U.S.C. § 365(d)(2) and (II) Omnibus Reply in Support of the Debtors Motion for Entry of an Order Pursuant to Section 365(d)(4) of the Bankruptcy Code Extending the Time within which the Debtors Must Assume or Reject Unexpired Leases of Nonresidential Real Property [Filed 12/12/16] (Docket No. 295)**

Related Documents: None.

Status: The responses as A, B and C have been resolved and language will be added to the revised form of order reflecting the resolutions. This matter will be going forward.

17. Cross-Motion to Limit the Time Within Which the Debtors May Assume or Reject the Lease of RS JZ Bedford, - 6th, LLC Pursuant to 11 U.S.C. § 365(d)(2) [Filed 12/5/16] (Docket No. 219)

Response Deadline: December 12, 2016 at 11:00 a.m.

Responses Received:

- A. Debtors' (I) Response to Objection to Debtors Motion for Entry of an Order Pursuant to Section 365(d)(4) of the Bankruptcy Code Extending the Time Within Which the Debtors Must Assume or Reject Unexpired Leases of Nonresidential Real Property and Cross-Motion to Limit the Time Within Which the Debtors May Assume or Reject the Lease of RS JZ Bedford 6th LLC Pursuant to 11 U.S.C. § 365(d)(2) and (II) Omnibus Reply in Support of the Debtors Motion for Entry of an Order Pursuant to Section 365(d)(4) of the Bankruptcy Code Extending the Time within which the Debtors Must Assume or Reject Unexpired Leases of Nonresidential Real Property [Filed 12/12/16] (Docket No. 295)**

Related Documents:

- A. Certification of Jonathan Bernstein, Pursuant to 28 U.S.C. § 1746, in Support of the Objection Of RS JZ Bedford N 6th, LLC to the Debtors Motion for Entry of an Order Pursuant to Section 365(d)(4) of the Bankruptcy Code Extending the Time Within Which the Debtors Must Assume or Reject Unexpired Leases of Nonresidential Real Property [Filed 12/5/16] (Docket No. 220)
- B. [Signed] Order Approving Motion to Shortening and Limiting Notice of Cross-Motion By Landlord To Limit the Time Within Which the Debtors May Assume or Reject the Lease of RS JZ Bedford,- 6th, LLC [Filed 12/8/16] (Docket No. 253)

Status: This matter will be going forward.

Dated: December 12, 2016
Wilmington, Delaware

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