

**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)
	:	

**AMENDED² NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON JANUARY 12, 2017, AT 11:30 A.M. (EASTERN TIME)**³

**Hearing Location: 824 N. Market St., 6th Floor, Courtroom #1,
Wilmington, DE 19801
Before the Honorable Brendan L. Shannon**

RESOLVED MATTER:

1. Motion to Compel an Order Allowing Immediate Payment of Administrative Expense Claim Filed by U.S. TelePacific Corp. [Filed 12/22/16] (Docket No. 378)

Response Deadline: January 5, 2017 at 4:00 p.m. Extended for the Debtors to January 10, 2017

Responses Received: Informal response from the Debtors

Related Documents: None.

Status: This matter has been resolved.

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 noted 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.

UNCONTESTED MATTERS UNDER CERTIFICATION OF NO OBJECTION/CERTIFICATION OF COUNSEL:

2. Application for an Order Pursuant to 11 U.S.C. §§ 328(a) and 1103 Authorizing and Approving the Employment and Retention of Emerald Capital Advisors as Financial Advisors to the Official Committee of Unsecured Creditors *Nunc Pro Tunc* to November 22, 2016 [Filed 12/22/16] (Docket No. 377)

Response Deadline: January 5, 2017 at 4:00 p.m.

Responses Received: None.

Related Documents:

- A. Certification of No Objection Regarding Application for an Order Pursuant to 11 U.S.C. §§ 328(a) and 1103 Authorizing and Approving the Employment and Retention of Emerald Capital Advisors as Financial Advisors to the Official Committee of Unsecured Creditors *Nunc Pro Tunc* to November 22, 2016 [Filed 1/6/17] (Docket No. 444)
- B. [Signed] Order Authorizing and Approving the Employment and Retention of Emerald Capital Advisors as Financial Advisors to the Official Committee of Unsecured Creditors *Nunc Pro Tunc* to November 22, 2016 [Filed 1/11/17] (Docket No. 465)**

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

3. Application of the Debtors for an Order Authorizing them to Retain and Employ JLT Specialty Insurance Services Inc. as Broker, *Nunc Pro Tunc* as of November 22, 2016 [Filed 12/22/16] (Docket No. 384)

Response Deadline: January 5, 2017 at 4:00 p.m.

Responses Received: None.

Related Documents:

- A. Certification of No Objection Regarding Application of the Debtors for an Order Authorizing them to Retain and Employ JLT Specialty Insurance Services Inc. as Broker, *Nunc Pro Tunc* as of November 22, 2016 [Filed 1/6/17] (Docket No. 443)
- B. [Signed] Order Authorizing the Debtors to Retain and Employ JLT Specialty Insurance Services Inc. as Broker, *Nunc Pro Tunc* as of November 22, 2016 [Filed 1/11/17] (Docket No. 464)**

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

4. Application of the Debtors for an Order (I) Authorizing Them to Employ and Retain DJM Realty Services, LLC *Nunc Pro Tunc* to December 19, 2016 and (II) Waiving Certain Reporting Requirements Pursuant to Local Rule 2016-2(h) [Filed 12/23/16] (Docket No. 393)

Response Deadline: January 6, 2017 at 4:00 p.m.

Responses Received: None.

Related Documents:

- A. Amended Exhibit B to the Application of the Debtors for an Order (I) Authorizing them to Employ and Retain DJM Realty Services, LLC as Real Estate Consultant, *Nunc Pro Tunc* to December 19, 2016 and (II) Waiving Certain Reporting Requirements Pursuant to Local Rule 2016-2(h) [Filed 12/28/16] (Docket No. 402)
- C. Certification of No Objection Regarding Application of the Debtors for an Order (I) Authorizing them to Employ and Retain DJM Realty Services, LLC as Real Estate Consultant, *Nunc Pro Tunc* to December 19, 2016 and (II) Waiving Certain Reporting Requirements Pursuant to Local Rule 2016-2(h) [Filed 1/9/17] (Docket No. 449)
- D. [Signed] Order (I) Authorizing the Employment and Retention of DJM Realty Services, LLC *Nunc Pro Tunc* to December 19, 2016 and (II) Waiving Certain Reporting Requirements Pursuant to Local Rule 2016-2(h) [Filed 1/11/17] (Docket No. 463)**

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

MATTERS GOING FORWARD:

5. Motion of the Debtors for Entry of Orders (I) (A) Approving Bidding Procedures for the Sale of Substantially All of the Debtors' Assets, (B) Authorizing the Debtors to Enter Into the Stalking Horse Purchase Agreement, (C) Approving Bid Protections, (D) Scheduling an Auction, (E) Approving the Form and Manner of Notice Thereof, (F) Approving Assumption and Assignment Procedures; And (G) Scheduling a Sale Hearing and Approving the Form and Manner of Notice Thereof; (II) (A) Approving the Sale of Substantially All of the Debtors' Assets Free and Clear of Liens, Claims, Interests and Encumbrances and (B) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases; and (III) Granting Related Relief [Filed 11/14/16] (Docket No. 53)

Response Deadline: January 11, 2017 at 12:00 p.m.

Responses Received:

- A. The Taubman Landlords' Precautionary Objection to any Prospective Motion for Approval of Sale of Leasehold Interest, Assumption and Assignment of Real Property Leases, and Cure Claim Objection [Filed 12/8/16] (Docket No. 265)

Status: The lease at issue is not subject to a Qualified Bid. This matter is not going forward at this time.

- B. Limited Objection of Simon Property Group, Inc. to Debtors' Notice of Possible Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with Sale [Filed 12/16/16] (Docket No. 343)

Status: None of the leases at issue is not subject to a Qualified Bid. This matter is not going forward at this time.

- C. Objection of Green Valley Ross Partnership to Notice of Possible Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with Sale [Filed 12/20/16] (Docket No. 363)

Status: The lease at issue is not subject to a Qualified Bid. This matter is not going forward at this time.

- D. Objection to Cure Costs Filed by V F Mall LLC, Annapolis Mall Owner LLC, Montgomery Mall Owner LLC, Santa Anita Shoppingtown LP, Westfield Topanga Owner LLC, Westfield, LLC, Westland Garden State Plaza Limited Partnership [Filed 12/21/16] (Docket No. 370)

Status: None of the leases at issue is not subject to a Qualified Bid. This matter is not going forward at this time.

- E. Objection Cure Amount/Assignment Objection Filed by Microsoft Corporation and Microsoft Licensing GP [Filed 12/21/16] (Docket No. 371)

Status: This response has been consensually resolved.

- F. Limited Cure Objection and Reservation of Rights of United Parcel Service, Inc. Related to the Proposed Assumption of Certain Executory Contracts and Unexpired Leases Pursuant to the Pending Sale of Substantially All of the Debtors' Assets [Filed 12/22/16] (Docket No. 373)

Status: This response has been consensually resolved.

G. Limited Cure Objection and Reservation of Rights of Salesforce.Com Inc. Related to the Proposed Assumption of Certain Executory Contracts and Unexpired Leases Pursuant to the Pending Sale of Substantially All of the Debtors Assets [Filed 12/22/16] (Docket No. 374)

i. Declaration of Jack Rolovich in Support of the Limited Cure Objection and Reservation of Rights of Salesforce.com Inc. Related to the Proposed Assumption of Certain Executory Contracts and Unexpired Leases Pursuant to the Pending Sale of Substantially all of the Debtors Assets [Filed 12/22/16] (Docket No. 379)

Status: This response has been consensually resolved.

H. Limited Objection and Reservation of Rights of Google, Inc. to Notice of Possible Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with Sale [Filed 12/22/16] (Docket No. 376)

Status: None of the leases at issue is not subject to a Qualified Bid. This matter is not going forward at this time.

I. Objection of Richard L. Moresco and Marie P. Moresco to Notice of Possible Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with Sale [Filed 12/22/16] (Docket No. 380)

Status: The lease at issue is not subject to a Qualified Bid. This matter is not going forward at this time.

J. Cure Objection of RSGF Granada Building, LLC [Filed 12/22/16] (Docket No. 381)

Status: This response has been consensually resolved.

K. Objection of I & L Weiss, LLC to Debtors' Notice of Possible Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with Sale [Filed 12/22/16] (Docket No. 382)

Status: The lease at issue is not subject to a Qualified Bid. This matter is not going forward at this time.

L. Objection of RetailNext, Inc. to Debtors' Notice of Possible Assumption and Assignment of Executory Contract in Connection with Sale [Filed 12/22/16] (Docket No. 383)

Status: None of the leases at issue is not subject to a Qualified Bid. This matter is not going forward at this time.

- M. Limited Objection to Notice of Possible Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection With Sale Filed by Deutsche Asset & Wealth Management, GGP Limited Partnership, Regency Meridian, LLC, Starwood Retail Partners LLC, The Trustees of The University of Pennsylvania [Filed 12/23/16] (Docket No. 386)

Status: None of the leases at issue is not subject to a Qualified Bid. This matter is not going forward at this time.

- N. Response of Hudson 6922 Hollywood LLC to Notice of Possible Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with Sale [Filed 12/23/16] (Docket No. 389)

Status: The lease at issue is not subject to a Qualified Bid. This matter is not going forward at this time.

- O. Cure Objection of Liberty Property Limited Partnership [Filed 12/23/16] (Docket No. 390)

Status: This response has been consensually resolved.

- P. Objection of Infor (US), Inc. to Proposed Sale of Substantially All of Debtors' Assets and Proposed Assumption and Assignment of Executory Contracts [Filed 12/23/16] (Docket No. 391)

Status: None of the leases at issue is not subject to a Qualified Bid. This matter is not going forward at this time.

- Q. Cure Objection of South Gate Business & Industrial Park Developers [Filed 12/23/16] (Docket No. 392)

Status: This response has been consensually resolved.

- R. Objection by Atalaya Asset Income Fund I LP and Consultants Funding Corporation to Proposed Assumption of Executory Contracts and Proposed Cure Amounts [Filed 12/23/16] (Docket No. 394)

Status: The Equipment, Schedules and Agreement are not subject to a Qualified Bid. This matter is not going forward at this time. The Debtors have filed a Reply to this Objection at Docket No. 450 which is listed below.

- S. Limited Objection and Reservation of Rights of The A.J.D. Building LLC to Proposed Cure Amount [Filed 12/23/16] (Docket No. 396)

Status: The lease at issue is not subject to a Qualified Bid. This matter is not going forward at this time.

- T. Response and Objection of American Commercial Equities Three, LLC to Proposed Cure Costs [Filed 12/23/16] (Docket No. 397)

Status: This response has been consensually resolved.

- U. Protective Objection of RS JZ Bedford, N - 6th, LLC to Debtors' Proposed Cure Amount [Filed 12/23/16] (Docket No. 398)

Status: The lease at issue is not subject to a Qualified Bid. This matter is not going forward at this time.

- V. Oracle's Limited Objection to and Reservation of Rights Regarding (1) Motion of the Debtors for Entry of Orders (I) (A) Approving Bidding Procedures for the Sale of Substantially All of the Debtors' Assets, (B) Authorizing the Debtors to Enter Into the Stalking Horse Purchase Agreement, (C) Approving Bid Protections, (D) Scheduling an Auction, (E) Approving the Form and Manner of Notice Thereof, (F) Approving Assumption and Assignment Procedures; And (G) Scheduling a Sale Hearing and Approving the Form and Manner of Notice Thereof; (II) (A) Approving the Sale of Substantially All of the Debtors' Assets Free and Clear of Liens, Claims, Interests and Encumbrances and (B) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases; and (III) Granting Related Relief ("Sale Motion") and (2) Notice of Possible Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection With Sale ("Assumption Notice") Filed by Oracle America, Inc. [Filed 1/3/17] (Docket No. 417)

Status: None of the leases at issue is not subject to a Qualified Bid. This matter is not going forward at this time.

- W. Objection to Sale of Property Filed by Oakland County Treasurer [Filed 1/4/17] (Docket No. 421)

- i. Oakland County Treasurer's Withdrawal of the Objection to Sale of Property [Filed 1/11/17] (Docket No. 461)**

Status: This objection has been withdrawn.

- X. Opposition by Atalaya Asset Income Fund I LP and Consultants Group Commercial Funding Corporation to Motion of the Debtors for Entry of Orders Approving the Sale of Substantially All of the Debtors' Assets Free and Clear of Liens, Claims, Interests and Encumbrances and (B) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases; and (III) Granting Related Relief [Filed 1/5/17] (Docket No. 437)

Status: The Equipment, Schedules and Agreement are not subject to a Qualified Bid. This matter is not going forward at this time. The Debtors have filed a Reply to this Objection at Docket No. 450 which is listed below.

- Y. Informal response of Safety Building Cleaning Corporation

Status: This response has been consensually resolved.

- Z. Informal response of 1841 Broadway Associates

Status: This response has been consensually resolved.

- AA. Informal response of George Wyner Realty Brattle Street, LLC and Meyer Dana and Sons, Inc.

Status: This response has been consensually resolved.

- BB. Informal response of 1234 Building LLC

Status: This response has been consensually resolved.

- CC. Informal response of 320 Broadway LLC

Status: This response has been consensually resolved.

- DD. Informal response of Retail Pro International LLC

Status: This response has been consensually resolved.

- EE. Informal response of Cellco Partnership d/b/a Verizon Wireless

Status: This response has been consensually resolved.

- FF. Informal response of Lincoln Centurion Retail and Sunset 58 LLC

Status: This response has been consensually resolved.

GG. Informal response of The Chubb Companies

Status: This response has been consensually resolved.

HH. Opposition of Allan Sebanc to Debtors' Notice of Possible Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with Sale [Filed 1/11/17] (Docket No. 462)

Status: The lease at issue is not subject to a Qualified Bid. This matter is not going forward at this time.

II. Informal cure objection of Malakia, Inc.

Status: The parties are attempting to resolve this matter and this informal objection is adjourned to a date to be determined.

Reply Deadline: January 9, 2017 at 12:00 p.m. Extended with respect to the opposition by Atalaya Asset Income Fund I LP and Consultants Group Commercial Funding Corporation for the Debtors to January 10, 2017 at 12:00 p.m.

Replies Received:

- A. Debtors' Omnibus Reply to Cure Cost Objections [Filed 1/9/17] (Docket No. 447)
- B. Debtors' Reply and Reservation of Rights with Respect to (I) Objection by Atalaya Asset Income Fund I LP and Consultants Funding Corporation to Proposed Assumption of Executory Contracts and Proposed Cure Amounts and (II) Opposition by Atalaya Asset Income Fund I LP and Consultants Funding Corporation to Motion of the Debtors for Entry of Orders Approving the Sale of Substantially All of the Debtors' Assets Free and Clear of Liens, Claims, Interests and Encumbrances and (B) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases; and (III) Granting Related Relief [Filed 1/10/17] (Docket No. 450)

Related Documents:

- A. [Signed] Order (I) Approving Bidding Procedures for the Sale of Substantially All of the Debtors' Assets, (II) Authorizing the Debtors to Enter Into the Stalking Horse Purchase Agreement, (III) Approving Bid Protections, (IV) Scheduling an Auction, (V) Approving the Form and Manner of Notice Thereof, (VI) Approving Assumption and Assignment Procedures, (VII) Scheduling a Sale Hearing and Approving the Form and Manner of Notice Thereof and (VIII) Granting Related Relief [Filed 12/5/16] (Docket No. 216)
- B. Notice of (A) The Debtors' Sale of Substantially All of Their Assets, Free and Clear of All Liens, Claims and Encumbrances As Set Forth in the Stalking Horse APA, (B) Approval of Certain Bidding Procedures Related To Such Sale, (C) The Time, Plan and Manner of Conducting an Auction and (D) The Time and Place of Conducting the Sale Hearing and Objection and Other Deadlines Related Thereto [Filed 12/5/16] (Docket No. 224)
- C. Notice of Possible Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection With Sale [Filed 12/6/16] (Docket No. 225)
- D. Notice of (I) Successful Bidders and Backup Bidder and (II) Proposed Assumed and Assigned Executory Contracts and Unexpired Leases in Connection with Sale [Filed 1/10/17] (Docket No. 451)
- E. Notice of Filing of Blackline of (I) Proposed Order (A) Approving the Sale of Stalking Horse Assets Free and Clear of Liens, Claims, Encumbrances and (B) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection Therewith; and (C) Granting Related Relief and (II) Stalking Horse APA [Filed 1/10/17] (Docket No. 457)**
- F. Declaration of Jonathan Roiter in Support of Debtors' Motion for Entry of an Order, Among Other Things, (A) Approving the Sale of Substantially All of the Debtors' Assets Free and Clear of Liens, Claims, Interests and Encumbrances and (B) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases (Filed by Gildan Activewear SRL) [Filed 1/11/17] (Docket No. 460)**
- G. Supplemental Declaration of Saul E. Burian In Support of Debtors' Sale and Bidding Procedures Motion and Entry of One or More Sale Orders [Filed 1/11/17] (Docket No. 485)**

H. Notice of Filing of Proposed Order Authorizing and Approving the Debtors' Entry Into Lease Termination Agreements and the Assumption and Assignment of Unexpired Leases in Connection Therewith [Filed 1/12/17] (Docket No. 486)

I. Notice of Filing of Clean and Blackline of Proposed Order (I) Approving the Sale of Stalking Horse Assets Free and Clear of Liens, Claims, Interests and Encumbrances and (II) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection Therewith, and (III) Granting Related Relief [Filed 1/12/17] (Docket No. 487)

Status: This matter will be going forward with respect to approval of the sale. There are no cure objections which are unresolved and going forward. **The informal objection of The Chubb Companies has been resolved. The objection filed by the Oakland County Treasurer has been withdrawn. The Debtors have filed a proposed order seeking approval of the sale of certain leases. The Debtors have also filed a further revised proposed Sale Order.**

6. Joint Motion of the Debtors and the Official Committee of Unsecured Creditors for Entry of an Order Approving Settlement [Filed 1/4/17] (Docket No. 428)

Response Deadline: January 11, 2017 at 12:00 p.m. **Extended for Standard General LP to January 11, 2017 at 4:00 p.m.**

Responses Received:

A. Standard General L.P.S Limited Objection to the (A) Joint Motion of the Debtors and the Official Committee of Unsecured Creditors for Entry of an Order Approving Settlement and (B) Final Order (I) Authorizing the Debtors to Utilize Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Parties and (III) Granting Related Relief [Filed 1/11/17] (Docket No. 466)

Related Documents:

A. [Signed] Order Granting Motion to Shorten Notice Period with Response to Joint Motion of the Debtors and the Official Committee of Unsecured Creditors for Entry of an Order Approving Settlement [Filed 1/6/17] (Docket No. 442)

B. Notice of Filing of Clean and Blackline Versions of (A) Order Approving Settlement, Including the Term Sheet Attached Thereto as Exhibit 1, and (B) Final Order (I) Authorizing the Debtors to Utilize Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Parties and (III) Granting Related Relief [Filed 1/12/17] (Docket No. 488)

C. Declaration of Mark Weinsten in Support of Joint Motion of the Debtors and the Official Committee of Unsecured Creditors for Entry of an Order Approving Settlement [Filed 1/12/17] (Docket No. 489)

Status: The objection of Standard General is resolved. The Debtors have filed a revised proposed order which will be presented to the Court at the hearing.

7. 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)

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)
- B. Standard General L.P.S Limited Objection to the (A) Joint Motion of the Debtors and the Official Committee of Unsecured Creditors for Entry of an Order Approving Settlement and (B) Final Order (I) Authorizing the Debtors to Utilize Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Parties and (III) Granting Related Relief [Filed 1/11/17] (Docket No. 466)**

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)

- i. [Signed] 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 12/12/16] (Docket No. 297)
- 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. [Signed] 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 12/12/16] (Docket No. 299)

- I. Notice of Filing of Final Order (I) Authorizing the Debtors to Utilize Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Parties and (III) Granting Related Relief [Filed 1/4/17] (Docket No. 430)
- J. Notice of Filing of Clean and Blackline Versions of (A) Order Approving Settlement, Including the Term Sheet Attached Thereto as Exhibit 1, and (B) Final Order (I) Authorizing the Debtors to Utilize Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Parties and (III) Granting Related Relief [Filed 1/12/17] (Docket No. 488)**

Status: This matter is resolved. The Debtors will present a revised proposed order at the hearing.

Dated: January 12, 2017
Wilmington, Delaware

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/s/ James E. O'Neill

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