

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE

----- X  
 In re : Chapter 11  
 :  
 BROOKS BROTHERS GROUP, INC., *et al.*, : Case No. 20-11785 (CSS)  
 :  
 Debtors.<sup>1</sup> : (Jointly Administered)  
 :  
 ----- X

NOTICE OF *THIRD* AMENDED<sup>2</sup> AGENDA FOR TELEPHONIC  
 AND VIDEO HEARING SCHEDULED FOR SEPTEMBER 11, 2020  
 AT 2:00 P.M. (PREVAILING EASTERN TIME), BEFORE  
 THE HONORABLE CHRISTOPHER S. SONTCHI, AT THE UNITED  
 STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE<sup>3</sup>

*AT THE DIRECTION OF THE COURT, THE HEARING HAS BEEN CANCELLED.*

**I. RESOLVED MATTERS:**

1. Debtors’ Application to Retain and Employ Richards, Layton & Finger, P.A. as Co-Counsel to the Debtors Effective as of the Petition Date [[Docket No. 293](#) – filed August 3, 2020]

Objection/Response Deadline: August 17, 2020 at 4:00 p.m. (ET)

Objections/Responses Received:

- A. Informal comments received from the Office of the United States Trustee (the “U.S. Trustee”)

Related Documents:

---

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are Brooks Brothers Group, Inc. (8883); Brooks Brothers Far East Limited (N/A); BBD Holding 1, LLC (N/A), BBD Holding 2, LLC (N/A), BBDI, LLC (N/A), Brooks Brothers International, LLC (N/A); Brooks Brothers Restaurant, LLC (3846); Deconic Group LLC (0969); Golden Fleece Manufacturing Group, LLC (5649); RBA Wholesale, LLC (0986); Retail Brand Alliance Gift Card Services, LLC (1916); Retail Brand Alliance of Puerto Rico, Inc. (2147); 696 White Plains Road, LLC (7265); and Brooks Brothers Canada Ltd. (N/A). The Debtors’ corporate headquarters and service address is 346 Madison Avenue, New York, New York 10017.

<sup>2</sup> **Amended items appear in bold.**

<sup>3</sup> All motions and other pleadings referenced herein are available online at the following address: <https://cases.primeclerk.com/brooksbrothers/>.

- i. Certification of Counsel Regarding Order Authorizing the Debtors to Retain and Employ Richards, Layton & Finger, P.A. as Co-Counsel to the Debtors Effective as of the Petition Date [[Docket No. 458](#) – filed August 18, 2020]
- ii. Order Authorizing the Debtors to Retain and Employ Richards, Layton & Finger, P.A. as Co-Counsel to the Debtors Effective as of the Petition Date [[Docket No. 461](#) – entered August 19, 2020]

Status: On August 19, 2020, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

2. Motion of Debtors for Entry of Order (I) Extending Time to File (A) Schedules of Assets and Liabilities and Statements of Financial Affairs and (B) Initial Rule 2015.3 Report; and (II) Granting Related Relief [[Docket No. 309](#) – filed August 5, 2020]

Objection/Response Deadline: August 19, 2020 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents:

- i. Certification of Counsel Regarding Order (I) Extending Time to File (A) Schedules of Assets and Liabilities and Statement of Financial Affairs and (B) Initial Rule 2015.3 Report; and (II) Granting Related Relief [[Docket No. 476](#) – filed August 20, 2020]
- ii. Order (I) Extending Time to File (A) Schedules of Assets and Liabilities and Statements of Financial Affairs and (B) Initial Rule 2015.3 Report; and (II) Granting Related Relief [[Docket No. 477](#) – entered August 21, 2020]

Status: On August 21, 2020, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

3. Application of the Official Committee of Unsecured Creditors of Brooks Brothers Group, Inc., *et al.* to Retain and Employ Akin Gump Strauss Hauer & Feld LLP as Counsel, Effective *Nunc Pro Tunc* to July 24, 2020 [[Docket No. 478](#) – filed August 21, 2020]

Objection/Response Deadline: September 4, 2020 at 4:00 p.m. (ET)

Objections/Responses Received:

- A. Informal comments received from the U.S. Trustee

Related Documents:

- i. Certification of Counsel Regarding Order Authorizing the Official Committee of Unsecured Creditors of Brooks Brothers Group, Inc., *et al.*, to Retain and Employ

Akin Gump Strauss Hauer & Feld LLP as Counsel Effective *Nunc Pro Tunc* to July 24, 2020 [[Docket No. 550](#) – filed September 8, 2020]

- ii. Order Authorizing the Official Committee of Unsecured Creditors of Brooks Brothers Group, Inc., et al., to Retain and Employ Akin Gump Strauss Hauer & Feld LLP as Counsel Effective *Nunc Pro Tunc* to July 24, 2020 [[Docket No. 558](#) – entered September 9, 2020]

Status: On September 9, 2020, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

4. Application Pursuant to Fed. R. Bankr. P. 2014(a) for Order Under Section 1103 of the Bankruptcy Code Authorizing the Employment and Retention of FTI Consulting, Inc. as Financial Advisor to the Official Committee of Unsecured Creditors *Nunc Pro Tunc* to July 27, 2020 [[Docket No. 479](#) – filed August 21, 2020]

Objection/Response Deadline: September 4, 2020 at 4:00 p.m. (ET)

Objections/Responses Received:

- A. Informal comments received from the U.S. Trustee

Related Documents:

- i. Declaration in Support of the Application Pursuant to Fed. R. Bankr. P. 2014(a) for Order Under Section 1103 of the Bankruptcy Code Authorizing the Employment and Retention of FTI Consulting, Inc. as Financial Advisor to the Official Committee of Unsecured Creditors *Nunc Pro Tunc* to July 27, 2020 [[Docket No. 480](#) – filed August 21, 2020]
- ii. Certification of Counsel Regarding Order Authorizing Retention of FTI Consulting, Inc. as Financial Advisor for the Official Committee of Unsecured Creditors *Nunc Pro Tunc* to July 27, 2020 [[Docket No. 551](#) – filed September 8, 2020]
- iii. Order Authorizing Retention of FTI Consulting, Inc. as Financial Advisor for the Official Committee of Unsecured Creditors *Nunc Pro Tunc* to July 27, 2020 [[Docket No. 555](#) – entered September 9, 2020]

Status: On September 9, 2020, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

5. Application for Entry of an Order Authorizing the Employment and Retention of Troutman Pepper Hamilton Sanders LLP as Co-Counsel to the Official Committee of Unsecured Creditors of Brooks Brothers Group, Inc., et al., *Nunc Pro Tunc* to July 27, 2020 [[Docket No. 481](#) – filed August 21, 2020]

Objection/Response Deadline: September 4, 2020 at 4:00 p.m. (ET)

Objections/Responses Received:

A. Informal comments received from the U.S. Trustee

Related Documents:

- i. Supplemental Affidavit of Evelyn J. Meltzer in Support of Application for Entry of an Order Authorizing the Employment and Retention of Troutman Pepper Hamilton Sanders LLP as Co-Counsel to the Official Committee of Unsecured Creditors of Brooks Brothers Group, Inc., *et al.*, *Nunc Pro Tunc* to July 27, 2020 [[Docket No. 536](#) – filed August 31, 2020]
- ii. Certification of Counsel Regarding Order Authorizing the Employment and Retention of Troutman Pepper Hamilton Sanders LLP as Co-Counsel to the Official Committee of Unsecured Creditors of Brooks Brothers Group, Inc., *et al.*, *Nunc Pro Tunc* to July 27, 2020 [[Docket No. 552](#) – filed September 8, 2020]
- iii. Order Authorizing the Employment and Retention of Troutman Pepper Hamilton Sanders LLP as Co-Counsel to the Official Committee of Unsecured Creditors of Brooks Brothers Group, Inc., *et al.*, *Nunc Pro Tunc* to July 27, 2020 [[Docket No. 556](#) – entered September 9, 2020]

Status: On September 9, 2020, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

6. The Official Committee of Unsecured Creditors’ Motion for an Order Determining That the Creditors’ Committee is Not Required to Provide Access to Confidential or Privileged Information of the Debtors and Fixing Creditor Information Sharing Procedures and Protocols Under 11 U.S.C. §§ 105(a), 107(b), and 1102(b)(3) Effective as of July 21, 2020 [[Docket No. 530](#) - filed August 28, 2020]

Objection/Response Deadline: September 4, 2020 at 4:00 p.m. (ET)

Objections/Responses Received:

A. Informal comments received from the Debtors

Related Documents:

- i. Certification of Counsel Regarding Order Determining That the Creditors’ Committee is Not Required to Provide Access to Confidential or Privileged Information of the Debtors and Fixing Creditor Information Sharing Procedures and Protocols Under 11 U.S.C. §§ 105(a), 107(b), and 1102(b)(3) Effective as of July 21, 2020 [[Docket No. 557](#) – filed September 9, 2020]
- ii. Order Determining That the Creditors’ Committee is Not Required to Provide Access to Confidential or Privileged Information of the Debtors and Fixing Creditor Information Sharing Procedures and Protocols Under 11 U.S.C. §§

105(a), 107(b), and 1102(b)(3) Effective as of July 21, 2020 [[Docket No. 559](#) – entered September 9, 2020]

Status: On September 9, 2020, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

**II. CONTINUED MATTERS:**

7. Motion of Debtors for Entry of Orders (I) Approving (A) Bidding Procedures, (B) Form and Manner of Notice of Sale, Auction, and Sale Hearing, (C) Assumption and Assignment Procedures, (II) Scheduling Auction and Sale Hearing, (III) Approving (A) Sale of Substantially All of Debtors’ Assets Free and Clear of Liens, Claims, Interests, and Encumbrances, and (B) Assumption and Assignment of Executory Contracts and Unexpired Leases, and (IV) Granting Related Relief [[Docket No. 154](#) – filed July 15, 2020]

Cure/Assumption Response Deadline: August 12, 2020 at 4:00 p.m. (ET)

Cure/Assumption Responses Received: See [Exhibit A](#) attached hereto.

Related Documents:

- i. Notice of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale Transaction [[Docket No. 306](#) – filed August 5, 2020]
- ii. Order (I) Approving Asset Purchase Agreement, (II) Authorizing Sale to the stalking Horse Bidder of the Acquired Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests, (III) Authorizing Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection Therewith, and (IV) Granting Related Relief [[Docket No. 444](#) – entered August 14, 2020] (the “[Sale Order](#)”)

Status: To the extent not otherwise resolved, the hearing on this matter with respect to all objections to the assumption and assignment of executory contracts and unexpired leases is adjourned to a date to be determined, and will be scheduled for hearing to the extent the Debtors file a Designation Notice (defined in the Sale Order) for the applicable contracts or leases in accordance with the designation rights procedures in the Sale Order.

8. Motion for an Order Authorizing Ralph Lauren Corporation to File Documents Under Seal [[Docket No. 350](#) – filed August 8, 2020]

Objection/Response Deadline: August 14, 2020 at 10:00 a.m. (ET)

Objections/Responses Received: None.

Related Documents:

- i. [Sealed] Limited Objection and Reservation of Rights of Ralph Lauren Corporation to (I) Motion of Debtors for Entry of Order Approving (A) Sale of Substantially All of Debtors' Assets Free and Clear of Liens, Claims, Interests, and Encumbrances, and (B) Assumption and Assignment of Executory Contracts and Unexpired Leases; and (II) Notice of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale Transaction [Docket No. 348 - filed August 8, 2020]
- ii. Notice of Filing of Proposed Redacted Limited Objection and Reservation of Rights of Ralph Lauren Corporation to (I) Motion of Debtors for Entry of Order Approving (A) Sale of Substantially All of Debtors' Assets Free and Clear of Liens, Claims, Interests, and Encumbrances, and (B) Assumption and Assignment of Executory Contracts and Unexpired Leases; and (II) Notice of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale Transaction [[Docket No. 349](#) – filed August 8, 2020 – Sealed Version at Docket No. 348]

Status: The hearing on this matter is adjourned to the omnibus hearing scheduled for September 24, 2020 at 11:00 a.m. (ET).

### **III. MATTER SUBMITTED UNDER CERTIFICATION:**

9. Debtors' Application for Authority to Retain and Employ KPMG LLP to Provide Tax Consulting and Tax Compliance Services Effective as of the Petition Date [[Docket No. 484](#) – filed August 21, 2020]

Objection/Response Deadline: September 4, 2020 at 4:00 p.m. (ET); extended to September 7, 2020 at 4:00 p.m. (ET) for the U.S. Trustee

Objections/Responses Received:

- A. Informal comments received from the U.S. Trustee

Related Documents:

- i. Supplemental Declaration of Howard Steinberg in Further Support of Debtors' Application for Authority to Retain and Employ KPMG LLP to Provide Tax Consulting and Tax Compliance Services Effective as of the Petition Date [[Docket No. 562](#) - filed September 9, 2020]
- ii. Certification of Counsel Regarding Order Authorizing Debtors to Retain and Employ KPMG LLP to Provide Tax Consulting and Tax Compliance Services Effective as of the Petition Date [[Docket No. 563](#) - filed September 9, 2020]
- iii. Order Authorizing Debtors to Retain and Employ KPMG LLP to Provide Tax Consulting and Tax Compliance Services Effective as of the Petition Date [[Docket No. 565](#) – entered September 9, 2020]

Status: On September 9, 2020, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

**IV. MATTER GOING FORWARD:**

10. Revised Notice of Higher and Better De Minimis Asset Sale [[Docket No. 475](#) – filed August 20, 2020]

Objection/Response Deadline: August 28, 2020 at 5:00 p.m. (ET)

Objections/Responses Received:

- A. Preliminary Objection [of HSUS Investments, LLC (together with HSUS Manufacturing, Inc.)] to Proposed De Minimis Asset Sale [[Docket No. 466](#) – filed August 20, 2020]
- B. Preliminary Objection [of HSUS Investments, LLC (together with HSUS Manufacturing, Inc.)] to Proposed De Minimis Asset Sale [[Docket No. 483](#) – filed August 20, 2020]
- C. Objection [of Garland RE LLC and Garland Operating LLC] to Proposed De Minimis Asset Sale [[Docket No. 529](#) – filed August 28, 2020]
  - i. Notice of Withdrawal of Objection [of Garland RE LLC and Garland Operating LLC] to Proposed *De Minimis* Asset Sale [[Docket No. 560](#) – filed September 9, 2020]

Related Documents:

- i. Order Authorizing and Establishing Procedures for the Sale, Transfer, or Abandonment of *De Minimis* Assets [[Docket No. 262](#) – entered July 30, 2020]
- ii. Notice of De Minimis Asset Sale [[Docket No. 308](#) – filed August 5, 2020]
- iii. Notice of Receipt of Competing Bids for De Minimis Asset Sale [[Docket No. 442](#) – filed August 14, 2020]
- iv. Notice of Higher and Better De Minimis Asset Sale [[Docket No. 462](#) – filed August 19, 2020]
- v. Notice of Hearing on Garland Assets *De Minimis* Sale [[Docket No. 544](#) – filed September 2, 2020]
- vi. Debtors' Omnibus Reply in Support of the Sale of the Garland Assets to Legacy Industries, Inc. [[Docket No. 549](#) – filed September 8, 2020]
- vii. Declaration of Stephen Marotta in Support of the Sale of the Garland Assets to Legacy Industries, Inc. [[Docket No. 553](#) – filed September 8, 2020]

Witness Information:

- A. The Debtors intend to offer testimony by declaration. To the extent live testimony is necessary, Mr. Stephen Marotta, the Debtors' Chief Restructuring Officer, will be available to testify by video from his office in New York, NY.
- B. HSUS intends to offer the live testimony of Chris Garcia, who will be testifying by video from Washington, DC.

**Status: At the direction of the Court, the hearing on this matter has been adjourned to the omnibus hearing scheduled for September 24, 2020 at 11:00 a.m. (ET).**

**V. ADDITIONAL MATTERS GOING FORWARD:**

- 11. Motion of Debtors for Entry of an Order Authorizing Brooks Brothers Group, Inc. to Act as Foreign Representative on Behalf of the Debtors' Estates Pursuant to 11 U.S.C. § 1505 [[Docket No. 570](#) - filed September 10, 2020]

Objection/Response Deadline: At the hearing.

Objections/Responses Received: None at this time.

Related Documents:

- i. Voluntary Chapter 11 Petition for Brooks Brothers Canada Ltd. [Case No. 20-12112 (CSS) - [Docket No. 1](#) – filed September 10, 2020]
- ii. **Order Authorizing Brooks Brothers Group, Inc. to Act as Foreign Representative on Behalf of the Debtors' Estates Pursuant to 11 U.S.C. § 1505 [[Docket No. 578](#) – entered September 11, 2020]**

**Status: On September 11, 2020, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.**

- 12. Motion of Brooks Brothers Canada Ltd. for Entry of an Order Directing the Joint Administration of its Chapter 11 Case with the Original Debtors' Chapter 11 Cases [[Docket No. 574](#), Case No. 20-12112 (CSS) – Docket No. 3 - filed September 10, 2020]

Related Documents:

- i. Voluntary Chapter 11 Petition for Brooks Brothers Canada Ltd. [Case No. 20-12112 (CSS) - [Docket No. 1](#) – filed September 10, 2020]
- ii. **Order Directing the Joint Administration of Brooks Brothers Canada Ltd.'s Chapter 11 Case with the Original Debtors' Chapter 11 Cases [[Docket No. 577](#) – entered September 11, 2020]**

**Status: On September 11, 2020, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.**



Dated: September 11, 2020  
Wilmington, Delaware

/s/ Christopher M. De Lillo

RICHARDS, LAYTON & FINGER, P.A.

Mark D. Collins (No. 2981)

Zachary I. Shapiro (No. 5103)

Brett M. Haywood (No. 6166)

Christopher M. De Lillo (No. 6355)

Sarah E. Silveira (No. 6580)

One Rodney Square

920 N. King Street

Wilmington, Delaware 19801

Telephone: (302) 651-7700

Facsimile: (302) 651-7701

E-mail: collins@rlf.com

shapiro@rlf.com

haywood@rlf.com

delillo@rlf.com

silveira@rlf.com

- and -

WEIL, GOTSHAL & MANGES LLP

Garrett A. Fail (admitted *pro hac vice*)

David J. Cohen (admitted *pro hac vice*)

767 Fifth Avenue

New York, New York 10153

Telephone: (212) 310-8000

Facsimile: (212) 310-8007

E-mail: garrett.fail@weil.com

davidj.cohen@weil.com

*Attorneys for Debtors*

*and Debtors in Possession*

**Exhibit A – Cure/Assumption Objections**

- A. Informal response from MasterCard International Incorporated
- B. Informal response from 1201 Connecticut Novel Coworking LLC
- C. Informal response from United Healthcare Services
- D. Informal response from Stored Value Solutions, a division of Comdata Inc.
- E. Informal response from SAP and Affiliates
- F. Informal response from Cigna Dental
- G. Informal response from Paradies Lagardère Travel Retail
- H. Objection and Reservation of Rights of Washington Prime Group Inc. to the (I) Notice of Cure and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale Transaction and (II) Proposed Sale of Debtors' Assets [[Docket No. 341](#) – filed August 7, 2020]
- I. Objection of Brookfield Property Retail, Inc. to the Proposed Assumption and Assignment of Certain Leases and Sale [[Docket No. 344](#) – filed August 8, 2020]
- J. Limited Objection of Brooks Sports, Inc. to Motion of Debtors for Entry of Orders (I) Approving (A) Bidding Procedures, (B) Form and Manner of Notice of Sale, Auction, and Sale Hearing, and (C) Assumption and Assignment Procedures, (II) Scheduling Auction and Sale Hearing, (III) Approving (A) Sale of Substantially All of Debtors' Assets Free and Clear of Liens, Claims, Interests, and Encumbrances, and (B) Assumption and Assignment of Executory Contracts and Unexpired Leases, and (IV) Granting Related Relief [[Docket No. 347](#) – filed August 8, 2020]
- K. Notice of Filing of Proposed Redacted Limited Objection and Reservation of Rights of Ralph Lauren Corporation to (I) Motion of Debtors for Entry of Order Approving (A) Sale of Substantially All of Debtors' Assets Free and Clear of Liens, Claims, Interests, and Encumbrances, and (B) Assumption and Assignment of Executory Contracts and Unexpired Leases; and (II) Notice of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale Transaction [[Docket No. 349](#) – filed August 8, 2020 – Sealed Version at Docket No. 348]
- L. The Taubman Landlords' Objection to Debtors' Motion of Debtors for Entry of Orders (I) Approving (A) Bidding Procedures, (B) Form and Manner of Notice of Sale, Auction, and Sale Hearing, and (C) Assumption and Assignment Procedures, (II) Scheduling Auction and Sale Hearing, (III) Approving (A) Sale of Substantially All of Debtors' Assets Free and Clear of Liens, Claims, Interests, and Encumbrances, and (B) Assumption and Assignment of Executory Contracts and Unexpired Leases, and (IV) Granting Related Relief [[Docket No. 310](#) – filed August 6, 2020]
- M. Objection of Town Square Ventures, L.P. to Notice of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale Transaction [[Docket No. 313](#) – filed August 6, 2020]

- N. Objection and Reservation of Rights of Washington Prime Group Inc. to the (I) Notice of Cure and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale Transaction and (II) Proposed Sale of Debtors' Assets [[Docket No. 341](#) – filed August 7, 2020]
- O. Objection of Brookfield Property Retail, Inc. to the Proposed Assumption and Assignment of Certain Leases and Sale [[Docket No. 344](#) – filed August 8, 2020]
- P. Limited Objection of CBL & Associates Management, Inc. to Debtors' Notice of Potential Assumption of Executory Contracts and Unexpired Leases and Cure Amounts [[Docket No. 356](#) – filed August 10, 2020]
- Q. Limited Objection of Wilson Canal Place II, LLC, OCT Stonefield Property Owner LLC, WS Tampa Owner LLC and 75 State Owner LLC to Notice of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale Transaction [[Docket No. 369](#) – filed August 11, 2020]
- R. Objection of Horizon Group Properties, Inc., Westfair, Inc., Westfield LLC and Certain Landlord Affiliates to the Notice of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale Transaction [[Docket No. 371](#) – filed August 11, 2020]
- S. Objection of Borderfree, Inc. to Proposed Cure Amount Listed by Debtors for the Assumption and Assignment of Executory Contract [[Docket No. 372](#) – filed August 11, 2020]
- T. Objection of ADCO Kittery, LLC to Notice of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale Transactions [[Docket No. 373](#) – filed August 11, 2020]
- U. Limited Objection and Reservation of Rights of Infor (US), Inc. with Respect to Proposed Sale of Substantially All of the Debtors' Assets and Proposed Assumption and Assignment of Executory Contracts [[Docket No. 383](#) – filed August 12, 2020]
- V. Objection of Cigna to Notice of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale Transaction [[Docket No. 385](#) – filed August 12, 2020]
- W. Limited Objection and Reservation of Rights of ShopperTrak RCT Corporation to the Notice of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale Transaction [[Docket No. 386](#) – filed August 12, 2020]
- X. Limited Objection of ERY Retail Podium LLC, Evergreen Walk Lifestyle Center, LLC, Federal Realty Investment Trust, Jonathan Club, PGIM Real Estate, Saucon Valley Lifestyle Center, L.P., The Forbes Company, and The Macerich Company to Debtors' (1) Notice of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with (I) Approving (A) Bidding Procedures, (B) Form

and Manner of Notice of Sale, Auction, and Sale Hearing, and (C) Assumption and Assignment Procedures, (II) Scheduling Auction and Sale Hearing, (III) Approving (A) Sale of Substantially All of Debtors' Assets Free and Clear of Liens, Claims, Interests, and Encumbrances, and (B) Assumption and Assignment of Executory Contracts and Unexpired Leases, and (IV) Granting Related Relief [[Docket No. 388](#) – filed August 12, 2020]

- Y. Objection of CDV Parties to Cure Notice [[Docket No. 391](#) – filed August 12, 2020]
- Z. Limited Objection and Reservation of Rights of Concur Technologies, Inc. to the Notice of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale Transaction [[Docket No. 392](#) – filed August 12, 2020]
- AA. Objection and Reservation of Rights of The Paradies Shops, LLC to (I) Notice of Cure and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale Transaction and (II) Proposed Sale of Debtors' Assets [[Docket No. 393](#) – filed August 12, 2020]
- BB. Limited Objection of Simon Property Group, Inc. to Debtors' Notice of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale Transaction [[Docket No. 395](#) – filed August 12, 2020]
- CC. Reservation of Rights of Swiss Garments Company to Notice of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale Transaction [[Docket No. 397](#) – filed August 12, 2020]
- DD. Limited Objection of Bayer Retail Company, L.L.C., Fritz Farm Retail Company, L.L.C., and Leeds Retail Center, LLC to Debtors' Notice of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale Transaction [[Docket No. 398](#) – filed August 12, 2020]
- EE. Objection of salesforce.com, Inc. to the Proposed Assumption and Assignment of Certain Executory Contracts and Cure Costs in Connection with the Sale of Substantially All Assets, and Reservation of Rights [[Docket No. 399](#) – filed August 12, 2020]
  - i. Declaration of Kevin Ramirez in Support of the Objection of salesforce.com, Inc. to the Proposed Assumption and Assignment of Certain Executory Contracts and Cure Costs in Connection with the Sale of Substantially All Assets, and Reservation of Rights [[Docket No. 402](#) – filed August 12, 2020]
- FF. Objection of Help II, LLC to Debtors' Notice of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale Transactions [[Docket No. 401](#) – filed August 12, 2020]
- GG. Limited Objection of Landlords, Asheville Retail Associates LLC and Palm Beach Outlets I, LLC, to Debtors' Potential Assumption and Assignment of Leases in Connection with Sale of Debtors' Assets [[Docket No. 405](#) – filed August 12, 2020]

- HH. Reservation of Rights of Nassau Inn Limited Partnership to the Notice of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale Transaction [[Docket No. 406](#) – filed August 12, 2020]
- II. Limited Objection of First Sterling Greenwich Corp. to Notice of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale Transaction [[Docket No. 411](#) – filed August 12, 2020]
- JJ. Brookfield Corners LLC’s Reservation of Rights with Respect to Notice of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale Transaction [[Docket No. 417](#) – filed August 13, 2020]