

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE

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 In re : Chapter 11  
 :  
 BROOKS BROTHERS GROUP, INC., *et al.*, : Case No. 20-11785 (CSS)  
 :  
 Debtors.<sup>1</sup> : (Jointly Administered)  
 :  
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**NOTICE OF *AMENDED*<sup>2</sup> AGENDA FOR TELEPHONIC AND VIDEO HEARING SCHEDULED FOR AUGUST 14, 2020 AT 10:00 A.M. (PREVAILING EASTERN TIME), BEFORE THE HONORABLE CHRISTOPHER S. SONTCHI, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE<sup>3</sup>**

**ANY PARTY WISHING TO PARTICIPATE IN THE HEARING MUST APPEAR THROUGH BOTH COURTCALL AND ZOOM.**

**TO APPEAR BY VIDEO CONFERENCE,  
PARTIES SHOULD USE THE FOLLOWING INFORMATION:  
JOIN ZOOMGOV HEARING: <https://debuscourts.zoomgov.com/j/1602584320>  
MEETING ID: 160 258 4320; PASSWORD: 496770**

**PLEASE NOTE: AUDIO MUST BE MUTED IN ZOOM ONCE CONNECTED. COURTCALL, LLC WILL PROVIDE THE AUDIO FOR THE HEARING.**

**TO APPEAR TELEPHONICALLY,  
PARTIES SHOULD CONTACT COURTCALL, LLC  
AT 844-925-0626 TO REGISTER THEIR APPEARANCE.**

<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); and 696 White Plains Road, LLC (7265). 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. RESOLVED MATTER:**

1. Debtors' Application for Entry of an Order (I) Authorizing the Debtors to Retain and Employ PJ Solomon, L.P. and PJ Solomon Securities, LLC as Investment Banker Effective as of the Petition Date, (II) Modifying Certain Time-Keeping Requirements, and (III) Granting Related Relief [[Docket No. 139](#) – filed July 13, 2020]

Objection/Response Deadline: July 27, 2020 at 4:00 p.m. (ET); extended to August 10, 2020 at 12:00 noon (ET) for the Official Committee of Unsecured Creditors (the "Committee")

Objections/Responses Received:

- A. Informal response received from the Office of the United States Trustee (the "U.S. Trustee")
- B. Informal response received from the Committee

Related Documents:

- i. Supplemental Declaration of Derek Pitts in Support of Debtors' Application for Entry of an Order (I) Authorizing the Debtors to Retain and Employ Peter J. Solomon, L.P. and PJ Solomon Securities, LLC as Investment Banker Effective as of the Petition Date, (II) Modifying Certain Time-Keeping Requirements, and (III) Granting Related Relief [[Docket No. 377](#) - filed August 12, 2020]
- ii. Certification of Counsel Regarding Order (I) Authorizing the Debtors to Retain and Employ PJ Solomon, L.P. and PJ Solomon Securities, LLC as Investment Banker Effective as of the Petition Date, and (II) Granting Related Relief [[Docket No. 378](#) - filed August 12, 2020]
- iii. Order (I) Authorizing the Debtors to Retain and Employ PJ Solomon, L.P. and PJ Solomon Securities, LLC as Investment Banker Effective as of the Petition Date, and (II) Granting Related Relief [[Docket No. 381](#) – entered August 12, 2020]

Status: On August 12, 2020, the Debtors submitted a revised proposed order under certification of counsel and the Court entered the order. Accordingly, a hearing on this matter is **no longer necessary**.

2. Motion of Debtors for Entry of an Order (I) Extending Time to Assume or Reject Unexpired Leases of Nonresidential Real Property and (II) Granting Related Relief [[Docket No. 274](#) – filed July 31, 2020]

Objection/Response Deadline: August 7, 2020 at 4:00 p.m. (ET)

Objections/Responses Received:

- A. Informal response received from the Committee

B. Informal responses received from various landlords

Related Documents:

- i. Certification of Counsel Regarding Order (I) Extending the Deadline to Assume or Reject Unexpired Leases of Nonresidential Real Property, and (II) Granting Related Relief [[Docket No. 379](#) - filed August 12, 2020]
- ii. Order (I) Extending the Deadline to Assume or Reject Unexpired Leases of Nonresidential Real Property, and (II) Granting Related Relief [[Docket No. 384](#) – entered August 12, 2020]

Status: On August 12, 2020, the Debtors submitted a revised proposed order under certification of counsel and the Court entered the order. Accordingly, a hearing on this matter is **no longer necessary**.

**II. CONTINUED MATTER:**

3. 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 objection has been continued to September 11, 2020 at 2:00 p.m. (ET).

**III. MATTERS SUBMITTED UNDER CERTIFICATION:**

4. Motion of Debtors for Entry of Interim and Final Orders (I) Approving of Debtors' Proposed Form of Adequate Assurance of Payment to Utility Providers, (II) Establishing Procedures for Determining Adequate Assurance of Payment for Future Utility Services, (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Service, (IV) Authorizing the Debtors to Honor Obligations to Payment Processor in the Ordinary Course of Business, and (V) Granting Related Relief [[Docket No. 10](#) – filed July 8, 2020]

Objection/Response Deadline: July 27, 2020 at 4:00 p.m. (ET); extended for the Committee

Objections/Responses Received:

- A. Informal response received from the Committee
- B. Objection of Certain Utility Companies to the Motion of Debtors for Entry of Interim and Final Orders (I) Approving of Debtors' Proposed Form of Adequate Assurance of Payment to Utility Providers, (II) Establishing Procedures for Determining Adequate Assurance of Payment for Future Utility Services, (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Service, (IV) Authorizing the Debtors to Honor Obligations to Payment Processor in the Ordinary Course of Business, and (V) Granting Related Relief [[Docket No. 192](#) – filed July 23, 2020]

Related Documents:

- i. Interim Order (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment to Utility Providers, (II) Establishing Procedures for Determining Adequate Assurance of Payment of Future Utility Services, (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Service, (IV) Authorizing the Debtors to Honor Obligations to Payment Processor in the Ordinary Course of Business, and (V) Granting Related Relief [[Docket No. 109](#) – entered July 10, 2020]
- ii. Notice of (A) Entry of Interim Order (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment to Utility Providers, (II) Establishing Procedures for Determining Adequate Assurance of Payment of Future Utility Services, (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Service, (IV) Authorizing the Debtors to Honor Obligations to Payment Processor in the Ordinary Course of Business, and (V) Granting Related Relief; and (B) Final Hearing Thereon [[Docket No. 122](#) – filed July 13, 2020]

Status: The Debtors intend to submit a revised proposed order under certification of counsel.

5. Motion of Debtors for Entry of an Order (I) Authorizing Sale of Southwick Manufacturing Facility Free and Clear of All Liens, Claims, Encumbrances, and Other Interests and (II) Granting Related Relief [[Docket No. 178](#) – filed July 21, 2020]

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

Objections/Responses Received:

- A. Limited Objection of the City of Haverhill, Massachusetts to Motion of Debtors for Entry of an Order (I) Authorizing Sale of Southwick Manufacturing Facility Free and Clear of All Liens, Claims, Encumbrances, and Other Interests and (II) Granting Related Relief [[Docket No. 300](#) – filed August 4, 2020]
- B. Informal comments received from JPMorgan**
- C. Informal comments received from the Purchaser**

Related Documents:

- i. Declaration of Stephen Marotta in Support of Motion of Debtors for Entry of an Order (I) Authorizing Sale of Southwick Manufacturing Facility Free and Clear of All Liens, Claims, Encumbrances, and Other Interests and (II) Granting Related Relief [[Docket No. 179](#) – filed July 21, 2020]
- ii. **Certification of Counsel Regarding Order Granting Motion of Debtors for Entry of Order Authorizing Sale of Southwick Manufacturing Facility Free and Clear of All Liens, Claims, Encumbrances, and Other Interests and (II) Granting Related Relief [[Docket No. 416](#) – filed August 13, 2020]**
- iii. **Order Granting Motion of Debtors for Entry of Order Authorizing Sale of Southwick Manufacturing Facility Free and Clear of All Liens, Claims, Encumbrances, and Other Interests and (II) Granting Related Relief [[Docket No. 424](#) – entered August 13, 2020]**

Status: **On August 13, 2020, the Debtors submitted a revised proposed order under certification of counsel and the Court entered the order. Accordingly, a hearing on this matter is no longer necessary.**

**IV. MATTERS GOING FORWARD:**

6. Motion of Debtors for (I) Authority to (A) Obtain Postpetition Financing, (B) Use Cash Collateral, (C) Grant Liens and Provide Superpriority Administrative Expense Status, (D) Grant Adequate Protection, (E) Modify the Automatic Stay, and (F) Schedule a Final Hearing and (II) Related Relief [[Docket No. 25](#) – filed July 8, 2020]

Objection/Response Deadline: July 27, 2020 at 4:00 p.m. (ET); extended for the Committee

Objections/Responses Received:

- A. Informal response received from the Committee
- B. The Texas Taxing Authorities' Objection to the Debtors' Interim Order (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition Secured Parties, (V) Modifying Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [[Docket No. 213](#) – filed July 27, 2020]
- C. Limited Objection of ERY Retail Podium LLC, Evergreen Walk Lifestyle Center, LLC, Federal Realty Investment Trust, The Forbes Company, LLC, PGIM Real Estate, Saucon Valley Lifestyle Center, L.P., and The Macerich Company to Motion of Debtors for (I) Authority to (A) Obtain Postpetition Financing, (B) Use Cash Collateral, (C) Grant Liens and Provide Superpriority Administrative Expense Status, (D) Grant Adequate Protection, (E) Modify the Automatic Stay, and (F) Schedule a Final Hearing and (II) Related Relief [[Docket No. 214](#) – filed July 27, 2020]
- D. Brookfield Property REIT Inc.'s Objection to Debtors' Motion for Entry of Order (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition Secured Parties, (V) Modifying Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [[Docket No. 215](#) – filed July 27, 2020]
- E. Joinder of the Taubman Landlords to Objections of Certain Landlords to Motion of Debtors for (I) Authority to (A) Obtain Postpetition Financing, (B) Use Cash Collateral, (C) Grant Liens and Provide Superpriority Administrative Expense Status, (D) Grant Adequate Protection, (E) Modify the Automatic Stay, and (F) Schedule a Final Hearing and (II) Related Relief [[Docket No. 216](#) – filed July 27, 2020]
- F. Objection [of Maricopa County Treasurer] to Interim Order (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition Secured Parties, (V) Modifying Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [[Docket No. 233](#) – filed July 28, 2020]

Related Documents:

- i. Interim Order (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition Secured Parties, (V) Modifying Automatic Stay,

(VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [[Docket No. 118](#) – entered July 10, 2020]

- ii. Notice of (A) Entry of Interim Order (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition Secured Parties, (V) Modifying Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief; and (B) Final Hearing Thereon [[Docket No. 131](#) – filed July 13, 2020]
- iii. Declaration of Adrian Frankum in Support of Motion of Debtors for Entry of Order (I) Extending Time for Performance of Obligations Arising Under Unexpired Non-Residential Real Property Leases and (II) Granting Related Relief [[Docket No. 238](#) – filed July 29, 2020]
- iv. **Debtors' Omnibus Reply to Objections to Debtors' Motion for (I) Authority to (A) Obtain Postpetition Financing, (B) Use Cash Collateral, (C) Grant Liens and Provide Superpriority Administrative Expense Status, (D) Grant Adequate Protection, (E) Modify the Automatic Stay, and (F) Schedule a Final Hearing and (II) Related Relief [[Docket No. 425](#) - filed August 13, 2020]**
- v. **Motion of Debtors for Leave to File Debtors' Reply in Support of the DIP Motion and Related Relief [[Docket No. 426](#) – filed August 13, 2020]**

Witness Information: The Debtors intend to offer testimony by declaration. To the extent live testimony is necessary, Mr. Derek Pitts of P.J. Solomon, L.P. will be available to testify by video from a home in Warren, CT. In addition, Mr. Adrian Frankum, the Debtors' Restructuring Officer, will be available for video testimony from a home in Ocean Grove, NJ.

Status: The Debtors have resolved all comments and objections except those related to section 506(c) waivers. This matter will proceed on a contested basis on those issues.

- 7. Omnibus Motion of Debtors for Entry of Order (I) Authorizing Debtors to (A) Reject Certain Unexpired Leases of Nonresidential Real Property and (B) Abandon *De Minimis* Property in Connection Therewith and (II) Granting Related Relief [[Docket No. 59](#) – filed July 8, 2020]

Objection/Response Deadline: July 27, 2020 at 4:00 p.m. (ET); extended by agreement to July 28, 2020 at 4:00 p.m. (ET) for Judith A. Carroll and Jay Grodin, Trustees; extended for the Committee

Objections/Responses Received:

- A. Informal response received from Judith A. Carroll and Jay Grodin, Trustees

- B. Informal response received from ERY Retail Podium LLC, Evergreen Walk Lifestyle Center, LLC, Federal Realty Investment Trust, PGIM Real Estate, Saucon Valley Lifestyle Center, L.P., The Forbes Company and The Macerich Company
- C. Informal response received from the Committee
- D. Informal response received from SPARC Group LLC**

Related Documents:

- i. Notice of Hearing with Respect to Omnibus Motion of Debtors for Entry of Order (I) Authorizing Debtors to (A) Reject Certain Unexpired Leases of Nonresidential Real Property and (B) Abandon *De Minimis* Property in Connection Therewith and (II) Granting Related Relief [[Docket No. 123](#) - filed July 13, 2020]

Status: The Debtors are working to resolve the informal comments. At this time, a hearing on this matter will go forward.

- 8. 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]

Sale Objection/Response Deadline: August 8, 2020 at 4:00 p.m. (ET)

Sale Objections/Responses Received: See [Exhibit A](#) attached hereto.

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

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

Related Documents:

- i. Supplement 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, (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. 204](#) – filed July 23, 2020]
- ii. Declaration of Derek Pitts in Support of 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, and the Supplement Related Thereto [[Docket No. 206](#) – filed July 23, 2020]
- iii. Order (I) Approving (A) Bidding Procedures, (B) Designation of Stalking Horse Bidder and Stalking Horse Bid Protections, (C) Scheduling Auction and Sale Hearing, (D) Form and Manner of Notice of Sale, Auction, and Sale Hearing, and (E) Assumption and Assignment Procedures and (II) Granting Related Relief [[Docket No. 285](#) – entered August 3, 2020]
- iv. Notice of Sale, Bidding Procedures, Auction and Sale Hearing [[Docket No. 302](#) – filed August 4, 2020]
- v. 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]
- vi. Notice of Adjournment of Auction [[Docket No. 352](#) – filed August 10, 2020]
- vii. Certificate of Publication of the Notice of Sale and Sale Hearing in *The Boston Globe* [[Docket No. 359](#) – filed August 10, 2020]
- viii. Certificate of Publication of the Notice of Sale, Bidding Procedures, Auction and Sale Hearing in *The New York Times* and *USA Today* [[Docket No. 361](#) – filed August 10, 2020]
- ix. Notice of Cancellation of Auction and Designation of the Stalking Horse Bid as the Successful Bid [[Docket No. 375](#) – filed August 11, 2020]
- x. **Notice of Filing of Proposed Order (I) Approving Asset Purchase Agreement Among Debtors and Buyer, (II) Authorizing Sale to the Stalking Horse Bidder of the Acquired Assets of the Debtors 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. 427](#) – filed August 13, 2020]**

Witness Information: The Debtors intend to offer testimony by declaration. To the extent live testimony is necessary, Mr. Derek Pitts of P.J. Solomon, L.P. will be available to testify by video from a home in Warren, CT.

Status: The hearing on this matter will go forward. **The hearing on this matter with respect to all objections to the assumption and assignment of executory contracts and unexpired leases, other than the objection filed by The Paradies Shops, LLC, is adjourned to a date to be determined.**

Dated: August 13, 2020  
Wilmington, Delaware

/s/ Christopher M. De Lillo

RICHARDS, LAYTON & FINGER, P.A.

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- and -

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*Attorneys for Debtors*

*and Debtors in Possession*

**Exhibit A – Sale and Cure Objections**

Objection	Status
<b>SALE OBJECTIONS</b>	
<p>A. Maricopa County Treasurer’s Objection to Motion 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 [<a href="#">Docket No. 234</a> – filed July 28, 2020]</p>	<p>The Debtors have resolved this objection.</p>
<p>B. Limited Objection of Certain Texas Taxing Entities to the 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 [<a href="#">Docket No. 314</a> – filed August 7, 2020]</p>	<p>The Debtors have resolved this limited objection.</p>

Objection	Status
<p>C. Consolidated Conditional Objection, Reservation of Rights and Responses of Workers United 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 [<a href="#">Docket No. 336</a> – filed August 7, 2020]</p>	<p><b>The Debtors have resolved this objection.</b></p>
<p>D. Limited Objection of UniCredit S.P.A. – New York Branch to the Debtors' Proposed Sale Transaction [<a href="#">Docket No. 340</a> – filed August 7, 2020]</p>	<p><b>The Debtors have resolved this objection.</b></p>
<p>E. 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 [<a href="#">Docket No. 341</a> – filed August 7, 2020]</p>	<p>At this time, the hearing on this matter is going forward.</p>
<p>F. Objection of Brookfield Property Retail, Inc. to the Proposed Assumption and Assignment of Certain Leases and Sale [<a href="#">Docket No. 344</a> – filed August 8, 2020]</p>	<p>At this time, the hearing on this matter is going forward.</p>

Objection	Status
<p>G. Objection of the Pension Benefit Guaranty Corporation to Motion of the 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 [<a href="#">Docket No. 345</a> – filed August 8, 2020]</p>	<p>At this time, the hearing on this matter is going forward.</p>
<p>H. Dixie Development Company's Limited Objection to and Reservation of Rights Regarding the Motion of the 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 [<a href="#">Docket No. 346</a> – August 8, 2020]</p>	<p><b>The Debtors have resolved this objection.</b></p>
<p>I. 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 [<a href="#">Docket No. 347</a> – filed August 8, 2020]</p>	<p>The hearing on this matter with respect to this objection is adjourned to a date to be determined.</p>

Objection	Status
<p>J. 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 [<a href="#">Docket No. 349</a> – filed August 8, 2020 – Sealed Version at Docket No. 348]</p>	<p>The hearing with respect to this objection has been continued to September 11, 2020 at 2:00 p.m. (ET).</p>
<b>CURE AND ASSIGNMENT OBJECTIONS</b>	
<p>A. Informal response from MasterCard International Incorporated</p>	<p>The Debtors are working to resolve this response. <b>The hearing with respect to this response is adjourned to a date to be determined.</b></p>
<p>B. Informal response from 1201 Connecticut Novel Coworking LLC</p>	<p>The Debtors are working to resolve this response. <b>The hearing with respect to this response is adjourned to a date to be determined.</b></p>
<p>C. Informal response from United Healthcare Services</p>	<p>The Debtors are working to resolve this response. <b>The hearing with respect to this response is adjourned to a date to be determined.</b></p>
<p>D. Informal response from Stored Value Solutions, a division of Comdata Inc.</p>	<p>The Debtors are working to resolve this response. <b>The hearing with respect to this response is adjourned to a date to be determined.</b></p>
<p>E. Informal response from SAP and Affiliates</p>	<p>The Debtors are working to resolve this response. <b>The hearing with respect to this response is adjourned to a date to be determined.</b></p>
<p>F. Informal response from Cigna Dental</p>	<p>The Debtors are working to resolve this response. <b>The hearing with respect to this response is adjourned to a date to be determined.</b></p>

Objection	Status
G. Informal response from Paradies Lagardère Travel Retail	The Debtors are working to resolve this response. <b>At this time, the hearing with respect to this response will go forward.</b>
H. 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 [ <a href="#">Docket No. 310</a> – filed August 6, 2020]	The Debtors are working to resolve this objection. <b>The hearing with respect to this objection is adjourned to a date to be determined.</b>
I. 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 [ <a href="#">Docket No. 313</a> – filed August 6, 2020]	The Debtors are working to resolve this objection. <b>The hearing with respect to this objection is adjourned to a date to be determined.</b>
J. 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 [ <a href="#">Docket No. 341</a> – filed August 7, 2020]	The Debtors are working to resolve this objection. <b>The hearing with respect to this objection is adjourned to a date to be determined.</b>
K. Objection of Brookfield Property Retail, Inc. to the Proposed Assumption and Assignment of Certain Leases and Sale [ <a href="#">Docket No. 344</a> – filed August 8, 2020]	The Debtors are working to resolve this objection. <b>The hearing with respect to this objection is adjourned to a date to be determined.</b>

Objection	Status
L. Limited Objection of CBL & Associates Management, Inc. to Debtors' Notice of Potential Assumption of Executory Contracts and Unexpired Leases and Cure Amounts [ <a href="#">Docket No. 356</a> – filed August 10, 2020]	The Debtors are working to resolve this objection. <b>The hearing with respect to this objection is adjourned to a date to be determined.</b>
M. 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 [ <a href="#">Docket No. 369</a> – filed August 11, 2020]	The Debtors are working to resolve this objection. <b>The hearing with respect to this objection is adjourned to a date to be determined.</b>
N. 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 [ <a href="#">Docket No. 371</a> – filed August 11, 2020]	The Debtors are working to resolve this objection. <b>The hearing with respect to this objection is adjourned to a date to be determined.</b>
O. Objection of Borderfree, Inc. to Proposed Cure Amount Listed by Debtors for the Assumption and Assignment of Executory Contract [ <a href="#">Docket No. 372</a> – filed August 11, 2020]	The Debtors are working to resolve this objection. <b>The hearing with respect to this objection is adjourned to a date to be determined.</b>
P. 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 [ <a href="#">Docket No. 373</a> – filed August 11, 2020]	The Debtors are working to resolve this objection. <b>The hearing with respect to this objection is adjourned to a date to be determined.</b>
Q. Limited Objection and Reservation of Rights of Citibank, N.A. to the Notice of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale Transactions [ <a href="#">Docket No. 382</a> – filed August 12, 2020]	The Debtors are working to resolve this objection. <b>The hearing with respect to this objection is adjourned to a date to be determined.</b>



Objection	Status
<p>R. 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 [<a href="#">Docket No. 383</a> – filed August 12, 2020]</p>	<p>The Debtors are working to resolve this objection. <b>The hearing with respect to this objection is adjourned to a date to be determined.</b></p>
<p>S. Objection of Cigna to Notice of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale Transaction [<a href="#">Docket No. 385</a> – filed August 12, 2020]</p>	<p>The Debtors are working to resolve this objection. <b>The hearing with respect to this objection is adjourned to a date to be determined.</b></p>
<p>T. 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 [<a href="#">Docket No. 386</a> – filed August 12, 2020]</p>	<p>The Debtors are working to resolve this objection. <b>The hearing with respect to this objection is adjourned to a date to be determined.</b></p>
<p>U. 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 [<a href="#">Docket No. 388</a> – filed August 12, 2020]</p>	<p>The Debtors are working to resolve this objection. <b>The hearing with respect to this objection is adjourned to a date to be determined.</b></p>

Objection	Status
V. Objection of CDV Parties to Cure Notice [ <a href="#">Docket No. 391</a> – filed August 12, 2020]	The Debtors are working to resolve this objection. <b>The hearing with respect to this objection is adjourned to a date to be determined.</b>
W. 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 [ <a href="#">Docket No. 392</a> – filed August 12, 2020]	The Debtors are working to resolve this objection. <b>The hearing with respect to this objection is adjourned to a date to be determined.</b>
X. 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 [ <a href="#">Docket No. 393</a> – filed August 12, 2020]	The Debtors are working to resolve this objection. <b>The hearing with respect to this objection will go forward.</b>
Y. 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 [ <a href="#">Docket No. 395</a> – filed August 12, 2020]	The Debtors are working to resolve this objection. <b>The hearing with respect to this objection is adjourned to a date to be determined.</b>
Z. 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 [ <a href="#">Docket No. 397</a> – filed August 12, 2020]	The Debtors are working to resolve this objection. <b>The hearing with respect to this objection is adjourned to a date to be determined.</b>
AA. 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 [ <a href="#">Docket No. 398</a> – filed August 12, 2020]	The Debtors are working to resolve this objection. <b>The hearing with respect to this objection is adjourned to a date to be determined.</b>

Objection	Status
<p>BB. 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 [<a href="#">Docket No. 399</a> – filed August 12, 2020]</p> <p>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 [<a href="#">Docket No. 402</a> – filed August 12, 2020]</p>	<p>The Debtors are working to resolve this objection. <b>The hearing with respect to this objection is adjourned to a date to be determined.</b></p>
<p>CC. 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 [<a href="#">Docket No. 401</a> – filed August 12, 2020]</p>	<p>The Debtors are working to resolve this objection. <b>The hearing with respect to this objection is adjourned to a date to be determined.</b></p>
<p>DD. 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 [<a href="#">Docket No. 405</a> – filed August 12, 2020]</p>	<p>The Debtors are working to resolve this objection. <b>The hearing with respect to this objection is adjourned to a date to be determined.</b></p>
<p>EE. 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 [<a href="#">Docket No. 406</a> – filed August 12, 2020]</p>	<p>The Debtors are working to resolve this objection. <b>The hearing with respect to this objection is adjourned to a date to be determined.</b></p>
<p><b>FF. 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 [<a href="#">Docket No. 411</a> – filed August 12, 2020]</b></p>	<p>The Debtors are working to resolve this objection. <b>The hearing with respect to this objection is adjourned to a date to be determined.</b></p>

Objection	Status
<p><b>GG. 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 [<a href="#">Docket No. 417</a> – filed August 13, 2020]</b></p>	<p><b>The Debtors are working to resolve this objection. The hearing with respect to this objection is adjourned to a date to be determined.</b></p>