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Proposed Co-Counsel for Debtors and Debtors in Possession

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

)	
In re:)	Chapter 11
)	
GUITAR CENTER, INC. <i>et al.</i> , ¹)	Case No. 20-34656 (KRH)
)	
Debtors.)	(Joint Administration Requested)
)	

FIRST DAY HEARING AGENDA

Time and Date of Hearing: November 23, 2020, at 2:30 p.m. (prevailing Eastern Time)

Location of Hearing: Courtroom of the Honorable Judge Huennekens, United States
Bankruptcy Court for the Eastern District of Virginia,
701 East Broad Street
Richmond, Virginia 23219-1888.

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: Guitar Center Holdings, Inc. (3262); Guitar Center, Inc. (0862); Guitar Center Stores, Inc. (4340); GTRC Services, Inc. (9503); GC Business Solutions, Inc. (3928); Guitar Center Gift Card Company, LLC (3370); Music & Arts Instructor Services, LLC (7811); and AVDG, LLC (4440). The Debtors’ service address is 5795 Lindero Canyon Rd., Westlake Village, CA 91362.

Copies of Motions: A copy of each of the below-referenced filings may be viewed on this Court's CM/ECF website (for a fee) at <https://ecf.vaeb.uscourts.gov/> or at the Debtors' Case Website (without charge) at <https://cases.primeclerk.com/guitarcenter>.

I. INTRODUCTION

1. "Motion for Expedited First Day Hearing." *Debtors' Motion for Entry of an Order: (I) Setting an Expedited Hearing on "First Day Motions" and (II) Granting Related Relief* [Docket No. 32]
2. "Joint Administration." *Debtors' Motion for Entry of an Order: (I) Directing Joint Administration of Chapter 11 Cases; and (II) Granting Related Relief* [Docket No. 3]

II. DECLARATIONS IN SUPPORT OF FIRST DAY RELIEF

3. "First Day Declaration." *Declaration of Tim Martin of Guitar Center, Inc., in Support of Chapter 11 Petitions and First Day Motions* [Docket No. 19]
4. "Declaration in Support of DIP Financing." *Declaration of Eric Winthrop in Support of Debtors' Motion for Entry of Interim and Final Orders: (I) Authorizing the Debtors to Obtain Senior Secured Priming Superpriority Postpetition Financing; (II) Authorizing Use of Cash Collateral; (III) Granting Liens and Providing Claims With Superpriority Administrative Expense Status; (IV) Granting Adequate Protection; (V) Modifying the Automatic Stay; (VI) Scheduling a Final Hearing; and (VII) Granting Related Relief* [Docket No. 31]

III. MOTION SCHEDULING COMBINED HEARING

5. "Combined Hearing Motion." *Debtors' Motion for Entry of an Order: (I) Scheduling a Combined Hearing to Approve the Disclosure Statement and Confirm the Plan; (II) Establishing Objection Deadlines; (III) Approving the Form and Manner of Combined Notice; (IV) Approving Solicitation Procedures and Ballots; (V) Approving Procedures for Assumption and Rejection of Executory Contracts and Unexpired Leases; (VI) Granting Certain Extensions; and (VII) Granting Related Relief* [Docket No. 14]

IV. MOTION RELATING TO FINANCING

6. "DIP & Cash Collateral Motion." *Debtors' Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, 503, 506, and 507: (I) Authorizing the Debtors to Obtain Senior Secured Priming Superpriority Postpetition Financing; (II) Authorizing Use of Cash Collateral; (III) Granting Liens and Providing Claims With Superpriority Administrative Expense Status; (IV) Granting Adequate Protection; (V)*

Modifying the Automatic Stay; (VI) Scheduling a Final Hearing; and (VII) Granting Related Relief [Docket No. 30]

V. MOTIONS RELATING TO OPERATIONS

7. *“Cash Management Motion.” Debtors’ Motion for Entry of Interim and Final Orders: (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System and Maintain Existing Bank Accounts and Business Forms, (B) Continue Using Credit Cards, and (C) Engage in Intercompany Transactions; (II) Providing Administrative Expense Priority for Postpetition Intercompany Claims; (III) Granting an Extension With Respect to Compliance With Requirements of Section 345(b) of the Bankruptcy Code; and (IV) Granting Related Relief [Docket No. 11]*
8. *“All Trade Vendors Motion.” Debtors’ Motion for Entry of Interim and Final Orders: (I) Authorizing Payment of Prepetition Obligations Owed to Trade Creditors in the Ordinary Course of Business; (II) Granting Administrative Expense Priority to All Undisputed Obligations on Account of Outstanding Orders; and (III) Granting Related Relief [Docket No. 6]*
9. *“Customer Programs Motion.” Debtors’ Motion for Entry of Interim and Final Orders: (I) Authorizing the Debtors to Maintain and Administer Certain Customer Programs and to Honor Certain Related Prepetition Obligations; and (II) Granting Related Relief [Docket No. 12]*
10. *“Wages Motion.” Debtors’ Motion for Entry of Interim and Final Orders: (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses, and (B) Continue Employee Benefits Programs; and (II) Granting Related Relief [Docket No. 7]*
11. *“Insurance Motion.” Debtors’ Motion for Entry of Interim and Final Orders: (I) Authorizing the Debtors to (A) Continue and Renew Their Insurance Policies and Honor Obligations Thereunder, and (B) Continue Surety Bond Program; and (II) Granting Related Relief [Docket No. 8]*
12. *“NOL Motion.” Debtors’ Motion for Entry of Interim and Final Orders: (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Common Stock; and (II) Granting Related Relief [Docket No. 13]*
13. *“Taxes Motion.” Debtors’ Motion for Entry of Interim and Final Orders: (I) Authorizing the Payment of Certain Prepetition Taxes and Fees; and (II) Granting Related Relief [Docket No. 10]*
14. *“Utilities Motion.” Debtors’ Motion for Entry of Interim and Final Orders: (I) Approving the Debtors’ Proposed Adequate Assurance of Payment for Future Utility Services; (II) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Services; (III) Approving the Debtors’ Proposed*

Procedures for Resolving Additional Assurance Requests; and (IV) Granting Related Relief [Docket No. 9]

VI. FIRST DAY ADMINISTRATIVE AND PROCEDURAL MOTIONS

15. *“Case Management Motion.” Debtors’ Motion for Entry of an Order: (I) Establishing Certain Notice, Case Management, and Administrative Procedures; and (II) Granting Related Relief [Docket No. 5]*
16. *“Consolidated Creditor List Motion.” Debtors’ Motion for Entry of an Order: (I) Authorizing the Debtors to File Consolidated Lists of (A) Creditors in Lieu of Submitting a Mailing Matrix for Each Debtor, and (B) 30 Largest Unsecured Creditors; (II) Authorizing the Debtors to Redact Certain Personal Identification Information; and (III) Granting Related Relief [Docket No. 4]*
17. *“Claims and Noticing Agent Retention Application.” Debtors’ Application for Entry of an Order Authorizing Retention and Employment of Prime Clerk LLC as Claims, Noticing, and Administrative Agent, Effective as of the Petition Date [Docket No. 17]*

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Dated: November 22, 2020
Richmond, Virginia

/s/ Jennifer E. Wuebker

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