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*Co-Counsel for Debtors in Possession*

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

	)	
In re:	)	Chapter 11
	)	
GEMSTONE SOLUTIONS GROUP, INC., <i>et al.</i> , <sup>1</sup>	)	Case No. 19-30258 (KLP)
	)	
Debtors.	)	(Jointly Administered)
	)	

**PROPOSED AGENDA FOR MATTERS SCHEDULED  
FOR MARCH 12, 2020, AT 1:00 P.M. (PREVAILING EASTERN TIME)**

**I. DEBTORS' DISCLOSURE STATEMENT**

1. **“Disclosure Statement Motion.”** *Debtors’ Motion for Entry of an Order (I) Approving the Disclosure Statement; (II) Approving Solicitation and Notice Materials; (III) Approving Forms of Ballots and Election Forms; (IV) Establishing Solicitation and Voting Procedures; (V) Establishing Procedures for Allowing Certain Claims for Voting Purposes; (VI) Scheduling a Confirmation Hearing and (VII) Establishing Notice and Objection Procedures* [Docket No. 1326]

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: Gemstone Solutions Group, Inc. f/k/a Gymboree Group, Inc. (6587); Gemstone Solutions Intermediate Corporation f/k/a Gymboree Intermediate Corporation (1473); Gemstone Solutions Holding Corporation f/k/a Gymboree Holding Corporation (0315); Gemstone Solutions Wholesale, Inc. f/k/a Gymboree Wholesale, Inc. (6588); Gemstone Solutions Mark, Inc. f/k/a Gym-Mark, Inc. (6459); Gemstone Solutions Operations, Inc. f/k/a Gymboree Operations, Inc. (6463); Gemstone Solutions Distribution, Inc. f/k/a Gymboree Distribution, Inc. (8669); Gemstone Solutions Manufacturing, Inc. f/k/a Gymboree Manufacturing, Inc. (6464); Gemstone Solutions RS, LLC f/k/a Gymboree Retail Stores, LLC (6461); Gemstone Solutions Card, LLC f/k/a Gym-Card, LLC (5720); and Gemstone Solutions PR, LLC f/k/a Gymboree Island, LLC (1215). The Debtors’ service address is P.O. Box 192976, San Francisco, California 94119.

Responses Received:

- A. *Objection of the United States Trustee to Debtors' Motion for Entry of an Order (I) Approving the Disclosure Statement; (II) Approving Solicitation and Notice Materials; (III) Approving Forms of Ballots and Election Forms; (IV) Establishing Solicitation and Voting Procedures; (V) Establishing Procedures for Allowing Certain Claims for Voting Purposes; (VI) Scheduling a Confirmation Hearing and (VII) Establishing Notice and Objection Procedures* [Docket No. 1382]
- B. *Objection to Disclosure Statement* [Docket No. 1383]
- C. *Objection of Lim Line Apparel Co., Ltd. to Debtors' Solicitation Procedures Motion* [Docket No. 1387]
- D. *Objection and Reservation of Rights of Textile Camones S.A. to Debtors' Motion for Entry of an Order (I) Approving the Disclosure Statement; (II) Approving Solicitation and Notice Materials; (III) Approving Forms of Ballots and Election Forms; (IV) Establishing Solicitation and Voting Procedures; (V) Establishing Procedures for Allowing Certain Claims for Voting Purposes; (VI) Scheduling a Confirmation Hearing and (VII) Establishing Notice and Objection Procedures* [Docket No. 1388]
- E. *Objection of Deutsche Bank Trust Company Americas to: (A) Debtors' Motion for Entry of an Order (I) Approving the Disclosure Statement; (II) Approving Solicitation and Notice Materials; (III) Approving Forms of Ballots and Election Forms; (IV) Establishing Solicitation and Voting Procedures; (V) Establishing Procedures for Allowing Certain Claims for Voting Purposes; (VI) Scheduling a Confirmation Hearing and (VII) Establishing Notice and Objection Procedures; and (B) (Opt-out of) the Proposed Third-Party Release Contained in the Plan* [Docket No. 1389]

Related Documents:

- F. *Joint Chapter 11 Plan of Reorganization* [Docket No. 1324]
- G. *Disclosure Statement for Debtors' Joint Chapter 11 Plan of Reorganization* [Docket No. 1325]
- H. *Notice of Filing of (I) Joint Chapter 11 Plan; (II) Disclosure Statement for Joint Chapter 11 Plan; And (III) Motion for Entry of an Order (A) Approving the Disclosure Statement; (B) Approving Solicitation and Notice Materials; (C) Approving Forms of Ballots and Election Forms; (D) Establishing Solicitation and Voting*

*Procedures; (E) Establishing Procedures for Allowing Certain Claims for Voting Purposes; (F) Scheduling a Confirmation Hearing and (G) Establishing Notice and Objection Procedures; and Notice of Hearing [Docket No. 1327]*

- I. *Debtors' Omnibus Reply to Objections to Debtors' Motion for Approval of Disclosure Statement [Docket No. 1406]*
- J. *Debtors' Supplemental Reply to DBTCA's Objections to Debtors' Motion for Approval of Disclosure Statement [Docket No. 1407]*

Status: This matter is going forward.

## II. **DEBTORS' MOTIONS**

1. **"U.S. Bank Settlement."** *Debtors' Motion to Approve Rule 9019 Compromise with U.S. Bank National Association [Docket No. 1375]*

Responses Received: None

Related Documents:

- A. *Notice of Motion and Notice of Hearing [Docket No. 1376]*

Status: This matter is going forward on an uncontested basis.

2. **"BAMS Stipulation."** *Notice of Filing of Proposed Stipulation and Consent Order Regarding Application of Reserve Held by BAMS [Docket No. 1384]*

Responses Received: None

Related Documents: None

Status: This matter is going forward on an uncontested basis.

3. **“Claims Satisfaction Procedures Motion.”** *Debtors’ Motion for Entry of an Order Approving Claim Satisfaction Procedures* [Docket No. 1385]

Responses Received: None

Related Documents:

- A. *Notice of Motion and Notice of Hearing* [Docket No. 1386]

Status: This matter is going forward on an uncontested basis.

### III. **CLAIMS OBJECTIONS**

1. **“Debtors’ Fourth Omnibus Claims Objection.”** *Notice of Debtors’ Fourth Omnibus Objection to Certain Amended Priority Claims* [Docket No 1358]

Responses Received: None

Related Documents: None

Status: This matter is going forward. With respect to certain informal responses received by the Debtors, the Debtors have agreed to extend the response deadline and/or adjourn the hearing as set forth on **Exhibit A** attached hereto.

2. **“Debtors’ Fifth Omnibus Claims Objection.”** *Notice of Debtors’ Fifth Omnibus Objection to Certain (A) Cross Debtor Duplicate Claims and (B) Amended or Superseded Claims* [Docket No. 1359]

Responses Received: None

Related Documents: None

Status: This matter is going forward. With respect to certain informal responses received by the Debtors, the Debtors have agreed to extend the response deadline and/or adjourn the hearing as set forth on **Exhibit A** attached hereto.

### IV. **NON-DEBTOR MOTIONS**

1. **“Pan Pacific Motion.”** *Notice of and Motion, in accordance with Agreed Order, to Determine that Pan Pacific’s D&O Claims are not Estate Property; and Notice of Hearing Thereon* [Docket No. 1013]

Responses Received: None

Related Documents:

- A. *Stipulation and Agreed Order by and among Debtors and Pan Pacific Co. Ltd. in Connection with Debtors' Emergency Motion for Interim and Final Orders (I) Enforcing the Automatic Stay, (II) Directing Parties to Comply with Prior Plan, and (III) Granting Related Relief* [Docket No. 934]

Status: Pursuant to the terms of the settlement agreement between the parties, this matter is to be carried forward as adjourned pending confirmation of a chapter 11 plan. Accordingly, the parties have agreed to adjourn this matter until the next omnibus hearing, April 21, 2020 at 11:00 A.M.

*[Remainder of page intentionally left blank]*

Dated: March 10, 2020  
Richmond, Virginia

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-and-

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**Exhibit A**

**Proposed Treatment of Responses to Omnibus Objections**

<b>Claimant</b>	<b>Claim No.</b>	<b>Omnibus Objection</b>	<b>Proposed Treatment</b>
Bharat Silks	1345	Fourth	Adjourned until April 21, 2020 and response deadline extended through April 14, 2020
Bharat Silks	1252	Fifth	Adjourned until April 21, 2020 and response deadline extended through April 14, 2020
Great Lakes Woodworking Company, Inc.	1190	Fourth	Adjourned until April 21, 2020 and response deadline extended through April 14, 2020
Merit Tat International Ltd.	2156	Fourth	Adjourned until April 21, 2020 and response deadline extended through April 14, 2020
Shartex Int'l Trading Co. Ltd.	1380	Fourth	Adjourned until April 21, 2020 and response deadline extended through April 14, 2020
Shartex Int'l Trading Co. Ltd.	1148	Fifth	Adjourned until April 21, 2020 and response deadline extended through April 14, 2020
Textiles Camones S.A.	176	Fourth	Adjourned until April 21, 2020 and response deadline extended through April 14, 2020
Vijay Garments Limited	1047	Fourth	Adjourned until April 21, 2020 and response deadline extended through April 14, 2020
Zhangjiagang Dongdu Textile Imp. and Exp. Co., Ltd.	1860	Fourth	Adjourned until April 21, 2020 and response deadline extended through April 14, 2020