

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

	)	
<b>In re:</b>	)	<b>Chapter 11</b>
	)	
<b>J &amp; M SALES INC., et al.,</b>	)	<b>Case No. 18-11801 (LSS)</b>
	)	
<b>Debtors.<sup>1</sup></b>	)	<b>Jointly Administered</b>
	)	

**NOTICE OF AGENDA OF MATTERS SCHEDULED  
FOR HEARING ON SEPTEMBER 5, 2018 AT 2:00 P.M. (EASTERN TIME)**

**THE BELOW LISTED MATTERS HAVE BEEN CONTINUED.  
WITH PERMISSION OF THE COURT, THE HEARING IS CANCELED.**

**CONTINUED MATTERS**

1. **Critical Vendors Motion** – Motion of Debtors for Entry of Interim and Final Orders (A) Authorizing the Debtors to Obtain Postpetition Credit from Critical Vendors; (B) Approving Critical Vendor Program and Granting of Junior Liens to Critical Vendors; (C) Authorizing Banks to Honor and Process Related Checks and Electronic Transfers; (D) Scheduling Final Hearing; and (E) Granting Related Relief [Filed: 8/6/18] (Docket No. 9).

Response Deadline: August 22, 2018 at 4:00 p.m. Eastern Time. Extended to August 31, 2018 for the Official Committee of Unsecured Creditors.

Responses Received: None as of the date hereof.

Related Documents:

- a) Declaration of Marc Bilbao in Support of Debtors’ Motions with Respect to DIP Financing, Critical Vendors and Store Closings [Filed: 8/6/18] (Docket No. 18).
- b) [Signed] Interim Order (A) Authorizing the Debtors to Obtain Postpetition Credit from Critical Vendors; (B) Approving Critical Vendor Program and Granting of

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<sup>1</sup> The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: J & M Sales Inc. (4697); National Stores, Inc. (4874); J&M Sales of Texas, LLC (5979); FP Stores, Inc. (6795); Southern Island Stores, LLC (8099); Southern Island Retail Stores LLC (4237); Caribbean Island Stores, LLC (9301); Pazzo FNB Corp. (9870); Fallas Stores Holdings, Inc. (6052); and Pazzo Management LLC (1924). Debtors’ mailing address is 15001 South Figueroa Street, Gardena, CA 90248.

Junior and Subordinated Liens to Critical Vendors; (C) Authorizing Banks to Honor and Process Related Checks and Electronic Transfers; (D) Scheduling Final Hearing; and (E) Granting Related Relief [Filed: 8/7/18] (Docket No. 83).

- c) Notice of Entry of Interim Order and Final Hearing Regarding Motion of Debtors for Entry of Interim and Final Orders (A) Authorizing the Debtors to Obtain Postpetition Credit from Critical Vendors; (B) Approving Critical Vendor Program and Granting of Junior Liens to Critical Vendors; (C) Authorizing Banks to Honor and Process Related Checks and Electronic Transfers; (D) Scheduling Final Hearing; and (E) Granting Related Relief [Filed: 8/8/18] (Docket No. 107).

Status: This matter has been continued to the hearing scheduled for September 13, 2018 at 2:00 p.m. Eastern Time.

2. **Utility Motion** – Motion of Debtors for Interim and Final Orders (I) Approving Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, and (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service Pursuant to Sections 105(a) and 366 of the Bankruptcy Code [Filed: 8/6/18] (Docket No. 14).

Response Deadline: August 22, 2018 at 4:00 p.m. Eastern Time.

Responses Received:

- a) Objection of Certain Utility Companies to the Motion of Debtors for Interim and Final Orders (I) Approving Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, and (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service Pursuant to Sections 105(a) and 366 of the Bankruptcy Code [Filed: 8/15/18] (Docket No. 162).
- b) Joinder of Additional Utility Companies to the Objection of Certain Utility Companies to the Motion of Debtors for Interim and Final Orders (I) Approving Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, and (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service Pursuant to Sections 105(a) and 366 of the Bankruptcy Code [Filed: 8/17/18] (Docket No. 173).
- c) Joinder of Florida Power & Light Company, NSTAR Electric Company d/b/a Eversource and NSTAR Gas Company to the Motion of Debtors for Interim and Final Orders (I) Approving Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, and (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service Pursuant to Sections 105(a) and 366 of the Bankruptcy Code [Filed: 8/22/18] (Docket No. 208).

- d) Objection of Duke Energy and Piedmont Natural Gas, Inc. to the Motion of Debtors for Interim and Final Orders (I) Approving Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, and (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service Pursuant to Sections 105(a) and 366 of the Bankruptcy Code [Filed: 8/22/18] (Docket No. 210).
- e) Joinder of Commonwealth Edison Company to the Objection of Certain Utility Companies to the Motion of Debtors for Interim and Final Orders (I) Approving Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, and (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service Pursuant to Sections 105(a) and 366 of the Bankruptcy Code [Filed: 8/29/18] (Docket No. 304).

Related Documents:

- a) [Signed] Interim Order (I) Approving Debtors' Proposed Form of Adequate Assurance Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, and (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service Pursuant to Sections 105(a) and 366 of the Bankruptcy Code [Filed: 8/7/18] (Docket No. 86).
- b) Notice of Entry of Interim Order and Final Hearing Regarding Motion of Debtors for Interim and Final Orders (I) Approving Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, and (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service Pursuant to Sections 105(a) and 366 of the Bankruptcy Code [Filed: 8/8/18] (Docket No. 114).

Status: This matter has been continued to the hearing scheduled for September 13, 2018 at 2:00 p.m. Eastern Time.

- 3. **GOB Motion** – Debtors' Motion for Interim and Final Orders (I) Authorizing the Debtors to Assume the Consulting Agreement, (II) Authorizing and Approving the Conduct of Store Closing Sales, with Such Sales to Be Free and Clear of All Liens, Claims, and Encumbrances, and (III) Granting Related Relief [Filed: 8/6/18] (Docket No. 16).

Response Deadline: August 22, 2018 at 4:00 p.m. Eastern Time. Extended to August 24, 2018 at 4:00 p.m. Eastern Time for The TJX Companies, Inc. Extended to August 31, 2018 for the Official Committee of Unsecured Creditors.

Responses Received:

- a) Objection of Maricopa County Treasurer to Debtors' Motion for Interim and Final Orders (I) Authorizing the Debtors to Assume the Consulting Agreement, (II) Authorizing and Approving the Conduct of Store Closing Sales, with Such Sales to Be Free and Clear of All Liens, Claims, and Encumbrances, and (III) Granting Related Relief [Filed: 8/13/18] (Docket No. 150).
- b) Limited Objection of the United States Trustee to the Debtors' Motion for Interim and Final Orders (I) Authorizing the Debtors to Assume the Consulting Agreement, (II) Authorizing and Approving the Conduct of Store Closing Sales, with Such Sales to Be Free and Clear of All Liens, Claims, and Encumbrances, and (III) and Granting Related Relief [Filed: 8/22/18] (Docket No. 218).
- c) Limited Objection of DLC Management Corp., Madison Avenue Realities, LLC, and Regency Centers, L.P. to Debtors' Motion for Interim and Final Orders (I) Authorizing the Debtors to Assume the Consulting Agreement, (II) Authorizing and Approving the Conduct of Store Closing Sales, with Such Sales to Be Free and Clear of All Liens, Claims, and Encumbrances, and (III) Granting Related Relief [Filed: 8/22/18] (Docket No. 219).

Related Documents:

- a) Declaration of Marc Bilbao in Support of Debtors' Motions with Respect to DIP Financing, Critical Vendors and Store Closings [Filed: 8/6/18] (Docket No. 18).
- b) Notice of Filing of Exhibits A and B to Letter Agreement Governing Inventory Disposition in Connection with Debtors' Motion for Interim and Final Orders (I) Authorizing the Debtors to Assume the Consulting Agreement, (II) Authorizing and Approving the Conduct of Store Closing Sales, with Such Sales to Be Free and Clear of All Liens, Claims, and Encumbrances, and (III) Granting Related Relief [Filed: 8/6/18] (Docket No. 21).
- c) [Signed] Interim Order (I) Authorizing the Debtors to Perform in Accordance with the Consulting Agreement, (II) Authorizing and Approving the Conduct of Store Closing Sales, with Such Sales to Be Free and Clear of All Liens, Claims, and Encumbrances, and (III) Granting Related Relief [Filed: 8/8/18] (Docket No. 89).
- d) Notice of Entry of Interim Order and Final Hearing Regarding Debtors' Motion for Interim and Final Orders (I) Authorizing the Debtors to Assume the Consulting Agreement, (II) Authorizing and Approving the Conduct of Store Closing Sales, with Such Sales to Be Free and Clear of All Liens, Claims, and Encumbrances, and (III) Granting Related Relief [Filed: 8/8/18] (Docket No. 111).

Status: This matter has been continued to the hearing scheduled for September 13, 2018 at 2:00 p.m. Eastern Time.

4. **DIP Motion** – Debtors’ Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, and 507 and Fed. R. Bankr. P. 2002, 4001 and 9014 (I) Authorizing Debtors and Debtors in Possession to Obtain Post-Petition Financing, (II) Authorizing Use of Cash Collateral, (III) Granting Liens and Super-Priority Claims, (IV) Granting Adequate Protection to Prepetition Lenders, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed: 8/6/18] (Docket No. 17).

Response Deadline: August 22, 2018 at 4:00 p.m. Eastern Time. Extended to August 30, 2018 at 4:00 p.m. Eastern Time for Oakwood Plaza Limited Partnership, The Price Reit, Inc., Plaza Del Sol 557, LLC, Milam Real Estate Capital, LLC, and Remo Tartaglia Associates. Extended to August 30, 2018 at 4:00 p.m. Eastern Time for various Texas Taxing Authorities. Extended to September 1, 2018 at 4:00 p.m. Eastern Time for Priority Payment Systems LLC. Extended to September 6, 2018 at 4:00 p.m. Eastern Time for the Official Committee of Unsecured Creditors.

Responses Received:

- a) Limited Objection of Brixmor Property Group, Inc., Federal Realty Investment Trust, PGIM Real Estate, Watt Companies, and Weitzman to Debtors’ Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, and 507 and Fed. R. Bankr. P. 2002, 4001 and 9014 (I) Authorizing Debtors and Debtors in Possession to Obtain Postpetition Financing, (II) Authorizing Use of Cash Collateral, (III) Granting Liens and Superpriority Claims, (IV) Granting Adequate Protection to Prepetition Lenders, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed: 8/22/18] (Docket No. 211).
- b) Limited Objection of DDR Corp., DLC Management Corp., Jones Lang LaSalle Americas, Inc., National Retail Properties, Inc., Philips International Holding Corp., and Regency Centers, L.P. to Debtors’ Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, and 507 and Fed. R. Bankr. P. 2002, 4001 and 9014 (I) Authorizing Debtors and Debtors in Possession to Obtain Post-Petition Financing, (II) Authorizing Use of Cash Collateral, (III) Granting Liens and Super-Priority Claims, (IV) Granting Adequate Protection to Prepetition Lenders, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed: 8/22/18] (Docket No. 216).
- c) Limited Objection of 3900 Indian Avenue, LLC and Landlords Affiliated with Weingarten Realty Investors to Debtors’ Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, and 507 and Fed. R. Bankr. P. 2002, 4001 and 9014 (I) Authorizing Debtors and Debtors in Possession to Obtain Postpetition Financing, (II) Authorizing Use of Cash Collateral, (III) Granting Liens and Super-Priority Claims, (IV) Granting Adequate Protection to Prepetition Lenders, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed: 8/22/18] (Docket No. 217).

- d) Limited Objection of SFI Ford City – Chicago, LLC to Debtors’ Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364 and 507 and Fed. R. Bankr. P. 2002, 4001 and 9014 (I) Authorizing Debtors and Debtors in Possession to Obtain Post-Petition Financing, (II) Authorizing Use of Cash Collateral, (III) Granting Liens and Super-Priority Claims, (IV) Granting Adequate Protection to Prepetition Lenders, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed: 8/22/18] (Docket No. 220).
- e) Joinder by Wasa Properties Southlake Pavilion LLC to Objections [Filed: 8/22/18] (Docket No. 222).
- f) Limited Objection of Amherst Station II LLC, Buckingham Station LLC, Edgewood Station LLC, Heritage Oaks Station L.P., Sunrise Marketplace Station LLC and Towne Crossing Station LLC to Debtors’ Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364 and 507 and Fed. R. Bankr. P. 2002, 4001 and 9014 (I) Authorizing Debtors and Debtors in Possession to Obtain Post-Petition Financing, (II) Authorizing Use of Cash Collateral, (III) Granting Liens and Super-Priority Claims, (IV) Granting Adequate Protection to Prepetition Lenders, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed: 8/22/18] (Docket No. 223).
- g) Limited Objection of Albany Road-Springfield Plaza, LLC to Debtors’ Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364 and 507 and Fed. R. Bankr. P. 2002, 4001 and 9014 (I) Authorizing Debtors and Debtors in Possession to Obtain Post-Petition Financing, (II) Authorizing Use of Cash Collateral, (III) Granting Liens and Super-Priority Claims, (IV) Granting Adequate Protection to Prepetition Lenders, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed: 8/22/18] (Docket No. 224).
- h) Joinder of Valley Plaza to Limited Objection of Brixmor Property Group, Inc., Federal Realty Investment Trust, PGIM Real Estate, Watt Companies, and Weitzman to Debtors’ Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, and 507 and Fed. R. Bankr. P. 2002, 4001 and 9014 (I) Authorizing Debtors and Debtors in Possession to Obtain Postpetition Financing, (II) Authorizing Use of Cash Collateral, (III) Granting Liens and Superpriority Claims, (IV) Granting Adequate Protection to Prepetition Lenders, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed: 8/29/18] (Docket No. 301).
- i) Limited Objection of Longs Drug Stores California, LLC to Debtors’ Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, and 507 and Fed. R. Bankr. P. 2002, 4001 and 9014 (I) Authorizing Debtors and Debtors in Possession to Obtain Postpetition Financing, (II) Authorizing Use of Cash Collateral, (III) Granting Liens and Superpriority Claims, (IV) Granting

Adequate Protection to Prepetition Lenders, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed: 8/29/18] (Docket No. 302).

- j) Limited Objection of Oakwood Plaza Limited Partnership, The Price Reit, Inc., Plaza Del Sol 557, LLC, Milam Real Estate Capital, LLC, and Remo Tartaglia Associates to Debtors' Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, and 507 and Fed. R. Bankr. P. 2002, 4001 and 9014 (I) Authorizing Debtors and Debtors in Possession to Obtain Postpetition Financing, (II) Authorizing Use of Cash Collateral, (III) Granting Liens and Superpriority Claims, (IV) Granting Adequate Protection to Prepetition Lenders, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed: 8/30/18] (Docket No. 308).

Related Documents:

- a) Declaration of Marc Bilbao in Support of Debtors' Motions with Respect to DIP Financing, Critical Vendors and Store Closings [Filed: 8/6/18] (Docket No. 18).
- b) [Signed] Interim Order Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364 and 507 (I) Granting Expedited Relief, (II) Approving Postpetition Financing, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Authorizing Use of Cash Collateral, (V) Granting Adequate Protection, (VI) Modifying Automatic Stay, and (VII) Granting Related Relief [Filed: 8/8/18] (Docket No. 93).
- c) Notice of Entry of Interim Order and Final Hearing Regarding Debtors' Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, and 507 and Fed. R. Bankr. P. 2002, 4001 and 9014 (I) Authorizing Debtors and Debtors in Possession to Obtain Post-Petition Financing, (II) Authorizing Use of Cash Collateral, (III) Granting Liens and Super-Priority Claims, (IV) Granting Adequate Protection to Prepetition Lenders, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed: 8/8/18] (Docket No. 115).
- d) Notice of First Amendment to Debtor in Possession Credit Agreement [Filed: 8/27/18] (Docket No. 292).

Status: This matter has been continued to the hearing scheduled for September 13, 2018 at 2:00 p.m. Eastern Time.

5. **365(d)(4) Extension Motion** – Debtors' Motion for Entry of an Order Extending the Deadline Pursuant to Section 365(d)(4) of the Bankruptcy Code to Assume or Reject Unexpired Leases of Nonresidential Real Property [Filed: 8/6/18] (Docket No. 19).

Response Deadline: August 22, 2018 at 4:00 p.m. Eastern Time.

Responses Received:

- a) Creditor Allenex Investments, Inc.'s Objection and Response to Debtors' Motion for Entry of an Order Extending the Deadline Pursuant to Section 365(d)(4) of the Bankruptcy Code to Assume or Reject Unexpired Leases of Nonresidential Real Property [Filed: 8/21/18] (Docket No. 199).

Related Documents:

- a) Notice of Hearing on Debtors' Motion for Entry of an Order Extending the Deadline Pursuant to Section 365(d)(4) of the Bankruptcy Code to Assume or Reject Unexpired Leases of Nonresidential Real Property [Filed: 8/8/18] (Docket No. 118).

Status: This matter has been continued to the hearing scheduled for September 13, 2018 at 2:00 p.m. Eastern Time.

Dated: August 31, 2018  
Wilmington, Delaware

PACHULSKI STANG ZIEHL & JONES LLP

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