

Status: A revised proposed order has been filed under certification of counsel. The Committee requests entry of the order attached to the certification of counsel.

2. **Province Retention Application** – Application for Entry for an Order Authorizing and Approving the Employment of Province, Inc. as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of August 16, 2018 [Filed: 9/7/18] (Docket No. 354).

Response Deadline: September 21, 2018 at 4:00 p.m. Eastern Time.

Responses Received:

- a) Informal comments from the United States Trustee.

Related Documents:

- a) Certification of Counsel Regarding Application for Entry for an Order Authorizing and Approving the Employment of Province, Inc. as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of August 16, 2018 [Filed: 9/24/18] (Docket No. 483).

Status: A revised proposed order has been filed under certification of counsel. The Committee requests entry of the order attached to the certification of counsel.

3. **Fox Rothschild Retention Application** – Application of the Official Committee of Unsecured Creditors Pursuant to 11 U.S.C. §§ 328 (a) and 1103(a) and Bankruptcy Rule 2014(a) for Authority to Employ and Retain Fox Rothschild LLP as Counsel Effective as of August 16, 2018 [Filed: 9/10/18] (Docket No. 361).

Response Deadline: September 24, 2018 at 4:00 p.m. Eastern Time.

Responses Received:

- a) Informal comments from the United States Trustee.

Related Documents:

- a) Certification of Counsel Regarding Application of the Official Committee of Unsecured Creditors Pursuant to 11 U.S.C. §§ 328 (a) and 1103(a) and Bankruptcy Rule 2014(a) for Authority to Employ and Retain Fox Rothschild LLP as Counsel Effective as of August 16, 2018 [Filed: 9/25/18] (Docket No. 488).

Status: A revised proposed order has been filed under certification of counsel. The Committee requests entry of the order attached to the certification of counsel.

MATTER GOING FORWARD

4. **Hilco Section 327 Issue re: 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).

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

Agent Response Deadline: September 6, 2018 at 4:00 p.m. Eastern Time.

Responses Received:

- a) 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).

Related Documents:

- a) [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).
- b) Brief of Hilco Merchant Resources, LLC in Support of the Debtors’ Motion for Interim and Final Orders (I) Authorizing the Debtors to Assume the Consulting Agreement, (II) Authorizing and Approving the Conduct of the Store Closing Sales, with Such Sale to Be Free and Clear of All Liens, Claims and Encumbrances, and (III) Granting Related Relief [Filed: 9/6/18] (Docket No. 345).
- c) Declaration of Ian Fredericks in Support of the Debtors’ Motion for Interim and Final Orders (I) Authorizing the Debtors to Perform in Accordance with the Consulting Agreement, (II) Authorizing and Approving the Conduct of Store Closing Sales, with Such Sale to Be Free and Clear of All Liens, Claims and Encumbrances, and (III) Granting Related Relief [Filed: 9/6/18] (Docket No. 346).
- d) Debtors’ Joinder to Brief of Hilco Merchant Resources, LLC in Support of the Debtors’ Motion for Interim and Final Orders Authorizing the Debtors to Assume the Consulting Agreement [Filed: 9/7/18] (Docket No. 355).

- e) [Signed] Interim Order (I) Authorizing the Debtors to Assume Consulting Agreement; and Final Order (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: 9/20/18] (Docket No. 460).

Status: This matter will go forward with respect to the Hilco section 327 issue.

Dated: October 1, 2018
Wilmington, Delaware

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