

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

In re:) Case No. 17-42267-659
) Chapter 11
Payless Holdings LLC, *et al.*,)
) Jointly Administered
Reorganized Debtors.)
) **Hearing Date and Time:** September 13,
) 2018 at 10:00 A.M. (Central Time)
) **Response Deadline:** September 6, 2018 at
) 4:00 P.M. (Central Time)
) **Hearing Location:** Courtroom 7 North

NOTICE OF HEARING

PLEASE TAKE NOTICE: The below listed response (the “Response”) will be heard on **September 13, 2018 at 10:00 a.m. (Central Time)** at the United States Bankruptcy Court for the Eastern District of Missouri, Eastern Division, Thomas F. Eagleton US Courthouse, 111 S. 10th Street, 7th Floor – North Courtroom, St. Louis, Missouri 63102:

REORGANIZED DEBTORS’ OMNIBUS RESPONSE TO CURE OBJECTIONS AND REQUEST FOR HEARING [Docket No. 2510]

WARNING: THIS RESPONSE SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE RESPONSE, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A WRITTEN RESPONSE AND SEND A COPY TO THE MOVING PARTY.

YOU MUST FILE AND SERVE YOUR RESPONSE BY SEPTEMBER 6, 2018 at 4:00 P.M. (CENTRAL TIME).

YOUR RESPONSE MUST STATE WHY THE RESPONSE SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE RESPONSE AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. THE TIME, DATE, AND LOCATION OF THE HEARING ARE SET OUT ABOVE. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE OBJECTIONS AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS.

Dated: August 22, 2018
St. Louis, Missouri

/s/ Steven N. Cousins

Steven N. Cousins MO 30788
Erin M. Edelman MO 67374
John G. Willard MO 67049
Armstrong Teasdale LLP
7700 Forsyth Boulevard, Suite 1800
St. Louis, MO 63105
Telephone: (314) 621-5070
Facsimile: (314) 621-2239
Email: scousins@armstrongteasdale.com
Email: eedelman@armstrongteasdale.com
Email: jwillard@armstrongteasdale.com

Arik Preis
Joanna F. Newdeck (admitted *pro hac vice*)
Akin Gump Strauss Hauer & Feld LLP
1333 New Hampshire Avenue, N.W.
Washington, DC 20036-1564
Telephone: 202.887.4000
Facsimile: 202.887.4288
Email: apreis@akingump.com
Email: jnewdeck@akingump.com

Counsel for Reorganized Debtors