

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

<p>In re</p> <p>RADIOSHACK CORPORATION, <i>et al.</i>,¹</p> <p style="text-align: center;">Debtors.</p>	<p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p>	<p>Chapter 11</p> <p>Case No. 15-10197 (BLS)</p> <p>(Jointly Administered)</p>
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NOTICE OF **THIRD AMENDED**² AGENDA OF MATTERS SCHEDULED FOR
HEARING ON FEBRUARY 25, 2015 AT 9:30 A.M. (EASTERN TIME)³

CONTESTED MATTERS GOING FORWARD:

1. Debtors’ Combined Motion for Entry of Orders: (I) Establishing Bidding and Sale Procedures; (II) Approving the Sale of Assets; and (III) Granting Related Relief [Docket No. 36; filed February 5, 2015]

Objection/Response Deadline: February 17, 2015 at 4:00 p.m. (ET), extended to February 19, 2015 at 4:00 p.m. (ET) for the Official Committee of Unsecured Creditors and the DIP Lenders.

Objections/Responses Received:

- A. Objection of The Acting United States Trustees Objection to the Debtors Combined Motion for Entry of Orders: (I) Establishing Bidding and Sale Procedures; (II) Approving the Sale of Assets; and (III) Granting Related Relief [Docket No. 270; filed February 14, 2015]

¹ The Debtors are the following eighteen entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): RadioShack Corporation (7710); Atlantic Retail Ventures, Inc. (6816); Ignition L.P. (3231); ITC Services, Inc. (1930); Merchandising Support Services, Inc. (4887); RadioShack Customer Service LLC (8866); RadioShack Global Sourcing Corporation (0233); RadioShack Global Sourcing Limited Partnership (8723); RadioShack Global Sourcing, Inc. (3960); RS Ig Holdings Incorporated (8924); RSIgnite, LLC (0543); SCK, Inc. (9220); Tandy Finance Corporation (5470); Tandy Holdings, Inc. (1789); Tandy International Corporation (9940); TE Electronics LP (9965); Trade and Save LLC (3850); and TRS Quality, Inc. (5417). The address of each of the Debtors is 300 RadioShack Circle, Fort Worth, Texas 76102.

² **Amended items appear in bold type.**

³ The hearing will be held before the Honorable Brendan L. Shannon, Chief United States Bankruptcy Judge, at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 6th Floor, Courtroom #1, Wilmington, Delaware 19801. Any party who wishes to appear telephonically at the February 23, 2015 hearing must contact CourtCall LLC at (866) 582-6878 by no later than February 24, 2015 at 12:00 p.m. (noon) (Eastern Time) in accordance with the Bankruptcy Court’s *Instructions for Telephonic Appearances Effective January 5, 2005, Revised April 27, 2009*.

- B. Limited Objection of KRG Beechwood, LLC; KRG Bolton Plaza, LLC; KRG Las Vegas Centennial Center, LLC; KRG Cool Creek Outlots, LLC; KRG Draper Peaks, LLC; KRG Hunter's Creek, LLC; KRG Merrimack Village, LLC; KRG Pine Ridge, LLC; KRG Port St. Lucie Landing, LLC; KRG Dallas Wheatland, LLC; KRG Las Vegas Eastern Beltway, LLC; KRG Temple Terrace, LLC; KRG St. Cloud 13th, LLC; Paragon Management Group, LLC; Rivercrest Realty Associates, LLC; RPAI Pacific Property Services LLC; RPAI Southwest Management, LLC; RPAI US Management, LLC; and Wheeler Real Estate, LLC to Debtors' Combined Motion for Entry of Orders: (I) Establishing Bidding and Sale Procedures; (II) Approving the Sale of Assets; and (III) Granting Related Relief [Docket No. 298; filed February 17, 2015]
- C. Objection of IA Management, L.L.C., Inland Commercial Property Management, Inc., Inland National Real Estate Services LLC, Inland TRS Property Management LLC and Riocan America Management, Inc. to Debtors' Combined Motion for Entry of Orders: (I) Establishing Bidding and Sale Procedures; (II) Approving the Sale of Assets; and (III) Granting Related Relief [Docket No. 301; filed February 17, 2015]
- D. Certain Texas Taxing Entities' Limited Objection to Debtors' Combined Motion for (I) Orders: (I) Establishing Bidding and Sale Procedures; (II) Approving the Sale of Assets; and (III) Granting Related Relief [Docket No. 302; filed February 17, 2015]
- E. Objection of Bird 107 Partners, Ltd. Now Known as Bird 107 Partners, Ltd., LLP to Debtors' Combined Motion for Entry of Orders: (1) Establishing Bidding and Sale Procedures; (II) Approving the Sale of Assets; and (III) Granting Related Relief [Docket No. 307; filed February 17, 2015]
- F. Digital Stream Technology's Omnibus Limited Objection to the Debtors: (I) Motion to Approve Debtor in Possession Financing; (II) Motion to Conduct Going Out of Business Sales; and (III) Bid Procedures Motion [Docket No. 308; filed February 17, 2015]
- G. Limited Objection of the Macerich Company, Starwood Retail Partners LLC, Alecta Real Estate USA, LLC, RMP Colonie LLC, Fairview Shopping Center, L.L.C. the Prudential Insurance Company of America, Vintage Capital Group, LLC, and Westwood Financial Corp. to Debtors' Combined Motion for Entry of Orders: (I) Establishing Bidding and Sale Procedures; (II) Approving the Sale of Assets; and (III) Granting Related Relief [Docket No. 310; filed February 17, 2015]
- H. Joinder of 420 Lincoln Road Associates, Ltd. in the Limited Objection to Debtors Combined Motion for Entry of Orders: (I) Establishing Bidding and Sale Procedures; (II) Approving the Sale of Assets; and (III) Granting Certain Related Relief [Docket No. 311; filed February 17, 2015]

- I. Limited Objection of Levin Properties, L.P. and Alshak Realty, LLC to Debtors' Motions to: Conduct Store Closings; Implement Procedures for the Rejection of Certain Leases, Including the Abandonment of Personal Property; and for Approval of the Sale of Assets, and Other Related Relief [Docket No. 313; filed February 17, 2015]
- J. Limited Objection of Joinder of Urbancal Oakland Mall, LLC, Ramco-Gershenson Properties, L.P., Ramco Jackson Crossing SPE, LLC, Ramco Spring Meadows, LLC, Chester Springs SC, LLC, Olentangy Plaza 450 LLC, Market Plaza 450, LLC, Linton Delray, LLC, West Allen Plaza, LLC, Agree Limited Partnership, Mt. Pleasant Shopping Center, L.L.C., SFP Pool Six, LLC, SFP Washington Shopping Center LLC, Schostak Brothers & Company, Inc., SFP Pool One Shopping Centers L.P., SFP Pool Two Shopping Centers L.P., Landings of Sarasota Florida L.L.C., SFP Pool Three Shopping Centers L.P. to Debtors Combined Motion for Entry of Orders: (I) Establishing Bidding and Sale Procedures; (II) Approving the Sale of Assets; and (III) Granting Related Relief [Docket No. 318; filed February 17, 2015]
- K. Objection of McKinley Mall LLC and Townview Retail LLC to Debtors' Combined Motion for Entry of Orders: (I) Establishing Bidding and Sale Procedures; (II) Approving the Sale of Assets; and (III) Granting Related Relief [Docket No. 319; filed February 17, 2015]
- L. Limited Objection and Reservation of Rights of Cellco Partnership d/b/a Verizon Wireless to Debtors' Motion for Entry of Order Establishing Bidding and Sale Procedures [Docket No. 321; filed February 17, 2015]
- M. Federal Warranty's Objection to Debtors' Combined Motion for Entry of Orders: (I) Establishing Bidding and Sale Procedures; (II) Approving the Sale of Assets; and (III) Granting Related Relief [Docket No. 324; filed February 17, 2015]
- N. Beverly Plaza LLC, MEC Lenox Associates Limited Partnership, and MEC Fitchburg Associates Limited Partnership's Limited Objection to Debtors' Combined Motion for Entry of Orders: (I) Establishing Bidding Procedures and Sale Procedures; (II) Approving the Sale of Assets; and (III) Granting Related Relief [Docket No. 326; filed February 17, 2015]
- O. Joinder of Kimco Realty Corporation and Gibraltar Management Company to Certain Objections to the Debtors' (A) Combined Motion for Entry of Orders: (I) Establishing Bidding and Sale Procedures; (II) Approving the Sale of Assets; and (III) Granting Related Relief (the "Sale Motion"); and (B) Motion for Entry of an Order (I) Authorizing the Debtors to Implement Procedures for the Rejection of Certain Leases, (II) Granting Authority to Take All Actions Necessary to Implement the Rejection Procedures, including the Rejection of Leases and the Abandonment of Personal Property, (III) Granting Certain Related Relief (the "Lease Rejection Procedures") [Docket No. 328; filed February 17, 2015]

- P. Objection of De Rito Pavilions 139, LLC to Debtors' Combined Motion for Entry of Orders: (I) Establishing Bidding and Sale Procedures; (II) Approving the Sale of Assets; and (III) Granting Related Relief [Docket No. 334; filed February 17, 2015]
- Q. Joinder in Limited Objections to Debtors' Motion for Entry of Orders (I) Establishing Bidding and Sale Procedures; (II) Approving the Sale of Assets; and (III) Granting Certain Related Relief [Docket No. 338; filed February 17, 2015]
- R. Objection of TCCI Broad Street LLC and Lucas Claremont Limited Partnership to Debtors' Combined Motion for Entry of Orders: (I) Establishing Bidding and Sale Procedures; (II) Approving the Sale of Assets; and (III) Granting Related Relief [Docket No. 332; filed February 17, 2015]
- S. Joinder in Limited Objections to Debtors' Motion for Entry of Orders (I) Establishing Bidding and Sale Procedures; (II) Approving the Sale of Assets; and (III) Granting Certain Related Relief [Docket No. 364; filed February 18, 2015]
- T. Objection of the Official Committee of Unsecured Creditors to Debtors' Motion for Entry of Order Establishing Bidding and Sale Procedures [Docket No. 369; filed February 18, 2015]
- U. Limited Objection of Wilmington Trust, National Association, as Trustee to Debtors' Bidding Procedures Motion [Docket No. 371; filed February 18, 2015]
- V. Joinder of Watauga 377, LLC, West 7th Corsicana, LLC, TSCA-245 Limited Partnership, and TSCA-253 Limited Partnership to Landlord Objections to Debtors' Motion for (I) an Order (A) Establishing Bid Procedures for the Sale of Certain of the Debtors' Nonresidential Real Property Leases, and (B) Granting Certain Related Relief and (II) an Order (A) Approving the Sale of Certain of the Debtors' Nonresidential Real Property Leases Free and Clear of Liens, Claims, Encumbrances and Other Interests, (B) Approving Assumption and Assignment of Leases, and (C) Granting Certain Related Relief [Docket No. 374; filed February 19, 2015]
- W. Objection of Brixmor Property Group, Inc., Phillips Edison & Company, American Resurgens Management Corporation, Federal Realty Investment Trust, Cencor Realty Services, Inc., DLC Management, Land Equities, LLC, TOCO Hill, Inc., Thomaston South Associates, Pliskin Realty and Development, Inc., WP Realty, Trustees of the University of Pennsylvania, and the Morris Companies to Debtors' Combined Motion for Entry of Order (I) Establishing Bidding and Sale Procedures; (II) Approving the Sale of Assets; and (III) Granting Related Relief [Docket No. 382; filed February 19, 2015]
- X. Joinder of WP Glimcher Landlords and BC Wood Properties Landlords in the Objections of Other Landlords to the Debtors' Combined Motion for Entry of Orders: (I) Establishing Bidding and Sale Procedures; (II) Approving the Sale of Assets; and (III) Granting Related Relief [Docket No. 384; filed February 19, 2015]

- Y. Joint Objection of SCP Lenders to Debtors' Request for Approval of Proposed Bidding Procedures, Stalking Horse APA, Bidder Protections and Related Relief [Docket No. 387; filed February 20, 2015]
- Z. Limited Objection of AT&T Corp. and Its Affiliates, to Debtors' Combined Motion for Entry of Orders: (I) Establishing Bidding and Sale Procedures; (II) Approving the Sale of Assets; and (III) Granting Related Relief [Docket No. 430; filed February 19, 2015]
- AA. Joinder of GRB Ontario Partners, LLC in Limited Objections to Debtors' Motions [Docket No. 434; filed February 20, 2015]
- BB. Objection and Joinder in Objections to Debtors' Combined Motion for Entry of Orders: (I) Establishing Bidding and Sale Procedures; (II) Approving the Sale of Assets; and (III) Granting Certain Related Relief [Docket No. 438; filed February 20, 2015]
- CC. Joinder of Northgate Partners, Ltd. in Limited Objections Filed by Other Landlords and AT&T [Docket No. 461; filed February 20, 2015]
- DD. Reply of Standard General L.P. to Objections of Official Committee of Unsecured Creditors, SCP Lenders, and Wilmington Trust to Debtors' Motion for Entry of Order Establishing Bidding and Sale Procedures [Docket No. 503; filed February 23, 2015]**

Related Documents:

- A. Motion for Order Expediting Consideration of, and Shortening the Notice Period Applicable to, the Bid Procedures Component of the Debtors' Combined Motion for Entry of Order: (I) Establishing Bidding and Sale Procedures; (II) Approving the Sale of Assets; and (III) Granting Related Relief [Docket No. 38; filed February 5, 2015]
- B. Order Expediting Consideration of, and Shortening the Notice Period Applicable to, the Bid Procedures Component of the Debtors' Combined Motion for Entry of Order: (I) Establishing Bidding and Sale Procedures; (II) Approving the Sale of Assets; and (III) Granting Related Relief [Docket No. 114; entered February 5, 2015]
- C. Notice of Bid Procedures Hearing [Docket No. 179; filed February 9, 2015]
- D. Declaration of David S. Kurtz in Support of the Debtors' (I) Bidding Procedures Motion and (II) DIP Motion [Docket No. 508; filed February 23, 2015]**
- E. Debtors' Consolidated Reply to Objections to Bidding Procedures Motion [Docket No. 509; filed February 23, 2015]**

Status: This matter is going forward.

2. Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §105, 107, 361, 362, 363, 364 and 507 and Rules 2002, 4001, 9014 and 9018 of the Federal Rules of Bankruptcy Procedure (I) Authorizing the Debtors to (A) Obtain Post-Petition Financing, (B) Use Cash Collateral (II) Granting Liens and Super-Priority Claims; (III) Scheduling a Final Hearing; (IV) Approving Entry into DIP Financing Support Agreement and (V) Granting Related Relief [Docket No. 52; filed February 5, 2015]

Objection/Response Deadline: February 17, 2015 at 4:00 p.m. (ET), extended to February 19, 2015 at 4:00 p.m. (ET) for the Official Committee of Unsecured Creditors and the DIP Lenders.

Objections/Responses Received:

- A. Preliminary Objection of Certain SCP Lenders to Debtors' DIP Financing Motion [Docket No. 65; filed February 6, 2015]
- B. Preliminary Objection and Reservation of Rights of Cellco Partnership d/b/a Verizon Wireless to Debtors' Motion for Entry of Interim and Final Orders Pursuant To 11 U.S.C. §105, 107, 361, 362, 363, 364 And 507 And Rules 2002, 4001, 9014 And 9018 Of The Federal Rules Of Bankruptcy Procedure (I) Authorizing The Debtors To (A) Obtain Post-Petition Financing, (B) Use Cash Collateral (II) Granting Liens And Super-Priority Claims; (III) Scheduling A Final Hearing; And (IV) Granting Related Relief [Docket No. 69; filed February 6, 2015]
- C. Limited Response of Standard General L.P. to Preliminary Objection of Certain SCP Lenders to Debtors' DIP Financing Motion [Docket No. 136; filed February 8, 2015]
- D. Objection of Wilmington Trust, National Association, as Trustee, to Debtors' DIP Financing Motion [Docket No. 137; filed February 8, 2015]
- E. Limited Objection of Certain Texas Taxing Entities to Debtors' Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §105, 107, 361, 362, 363, 364 and 507 and Rules 2002, 4001, 9014 and 9018 of the Federal Rules of Bankruptcy Procedure (I) Authorizing the Debtors to (A) Obtain Post-Petition Financing, (B) Use Cash Collateral (II) Granting Liens and Super-Priority Claims; (III) Scheduling a Final Hearing; (IV) Approving Entry into DIP Financing Support Agreement and (V) Granting Related Relief [Docket No. 300; filed February 17, 2015]
- F. Digital Stream Technology's Omnibus Limited Objection to the Debtors: (I) Motion to Approve Debtor in Possession Financing; (II) Motion to Conduct Going Out of Business Sales; and (III) Bid Procedures Motion [Docket No. 308; filed February 17, 2015]
- G. Objection of Official Committee of Unsecured Creditors to Debtors' Motion for

Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 107, 361, 362, 363, 364 and 507 and Rules 2002, 4001, 9014 and 9018 of Federal Rules of Bankruptcy Procedure (I) Authorizing Debtors to (A) Obtain Post-Petition Financing, (B) Use Cash Collateral (II) Granting Liens and Super-Priority Claims; (III) Scheduling a Final Hearing; (IV) Approving Entry Into DIP Financing Support Agreement and (V) Granting Related Relief [Docket No. 433; hand filed February 19, 2015]

- H. Joinder of Wilmington Trust, National Association, as Trustee, to Objection of Official Committee of Unsecured Creditors to Debtors' Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 107,361, 362, 363, 364 And 507 and Rules 2002, 4001, 9014 and 9018 of Federal Rules of Bankruptcy Procedure (I) Authorizing Debtors to (A) Obtain Post-Petition Financing, (B) Use Cash Collateral (II) Granting Liens and Super-Priority Claims; (III) Scheduling a Final Hearing; (IV) Approving Entry Into DIP Financing Support Agreement and (V) Granting Related Relief [Docket No. 436; filed February 20, 2015]
- I. **Joint Omnibus Reply of the Administrative Agent for the Debtor-in-Possession Credit Facility and the First Out ABL Lenders to the Objections to the Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Obtain Post-Petition Financing, (B) Use Cash Collateral; (II) Granting Liens and Super-Priority Claims; (III) Scheduling a Final Hearing; (IV) Approving Entry into DIP Financing Support Agreement and (V) Granting Related Relief [Docket No. 512; filed February 23, 2015]**

Related Documents:

- A. RadioShack Corporation Debtor-In-Possession Credit Agreement Agency Fee Letter [Docket No. 61; filed February 6, 2015] (FILED UNDER SEAL)
- B. Order (I) Authorizing the Debtors to (A) Obtain Financing on an Interim Basis and (B) Utilize Cash Collateral of Pre-Petition Secured Parties on an Interim Basis, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Granting Related Relief, Pursuant to 11 U.S.C. Sections 105, 361, 362, 363(C), (D) & (E), 364(C), (D) & (E) and 507(B), and (V) Scheduling a Final Hearing Authorizing Financing on a Final Basis Pursuant to Bankruptcy Rule 4001 [Docket No. 190; entered February 10, 2015]
- C. Notice of Entry of Interim Order and Final Hearing on Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. Section 105, 107, 361, 362, 363, 364 and 507 and Rules 2002, 4001, 9014 and 9018 of the Federal Rules of Bankruptcy Procedure (I) Authorizing the Debtors to (A) Obtain Post-Petition Financing, (B) Use Cash Collateral (II) Granting Liens and Super-Priority Claims; (III) Scheduling a Final Hearing; (IV) Approving Entry into DIP Financing Support Agreement and (V) Granting Related Relief [Docket No. 194; filed February 10, 2015]
- D. Notice of Filing of Proposed Form of Final Order Pursuant to 11 U.S.C. Sections

105, 361, 362, 363(c), 363(d), 363(e), 364(c), 364(d), & 364(e) and 507(b), (I) Authorizing the Debtors to (A) Obtain Post-Petition Financing, (B) Use Cash Collateral, (II) Granting Liens and Super-Priority Claims; (III) Scheduling A Final Hearing; (IV) Approving Entry Into DIP Finance Support Agreement and (V) Granting Related Relief [Docket No. 372; filed February 18, 2015]

- E. **Declaration of David S. Kurtz in Support of the Debtors' (I) Bidding Procedures Motion and (II) DIP Motion [Docket No. 508; filed February 23, 2015]**
- F. **Debtors' Reply in Support of Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 107, 361, 362, 363, 364 And 507 and Rules 2002, 4001, 9014 and 9018 of the Federal Rules of Bankruptcy Procedure (I) Authorizing the Debtors to (A) Obtain Post-Petition Financing, (B) Use Cash Collateral (II) Granting Liens and Super-Priority Claims; (III) Scheduling a Final Hearing; (IV) Approving Entry into DIP Financing Support Agreement and (V) Granting Related Relief [Docket No. 510; filed February 23, 2015]**

Status: This matter is going forward.

- 3. Motion of Debtors for an (A) Order Authorizing the Filing Under Seal of Certain Confidential Commercial Information in Connection with Debtors' Motion for Entry of an Order Authorizing Them to Enter into Postpetition Credit Agreement and Pay Certain Related Fees and (B) *In Camera* Hearing [Docket No. 55; filed February 5, 2015]

Objection/Response Deadline: February 17, 2015 at 4:00 p.m. (ET)

Objections Filed/ Received: Informal comments received from the Office of the United States Trustee

Related Documents:

- A. RadioShack Corporation Debtor-In-Possession Credit Agreement Agency Fee Letter [Docket No. 61; filed February 6, 2015] (FILED UNDER SEAL)
- B. Notice of Hearing on Motion of Debtors for an (A) Order Authorizing the Filing Under Seal of Certain Confidential Commercial Information in Connection with Debtors' Motion for Entry of an Order Authorizing Them to Enter into Postpetition Credit Agreement and Pay Certain Related Fees and (B) *In Camera* Hearing [Docket No. 203; filed February 10, 2015]

Status: This matter is going forward.

Dated: February 23, 2015
Wilmington, Delaware

Respectfully submitted,

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