# UNITED STATES BANKRUPTCY COURT DISTRICT OF DELAWARE

In re :	Chapter 11
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RADIOSHACK CORPORATION, et al., Case No. 15-10197 (BLS)

Debtors. : (Jointly Administered)

# NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING ON MARCH 19, 2015 AT 9:00 A.M. (EASTERN TIME)<sup>2</sup>

#### **CONTESTED MATTER 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 (Solely Relating to Stalking Horse Purchaser Break-Up Fee and Expense Reimbursement and Sprint Expense Reimbursement):

A. Objection of the Acting United States Trustee 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]

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.

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 March 19, 2015 hearing must contact CourtCall LLC at (866) 582-6878 by no later than March 18, 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. 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]
- C. 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]
- D. 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. 502; 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]
- F. Certification of Counsel Regarding Revised Proposed Order (I) Approving Bid and Sale Procedures, (II) Approving the Form and Manner of Notice of the Sale and Assumption and Assignment of Executory Contracts and Unexpired Leases and (III) Scheduling an Auction and Sale Hearing [Docket No. 861; filed March 6, 2015]
- G. Order (I) Approving Bid and Sale Procedures, (II) Approving the Form and Manner of Notice of the Sale and Assumption and Assignment of Executory Contracts and Unexpired Leases and (III) Scheduling an Auction and Sale Hearing [Docket No. 871; entered March 9, 2015]

- H. Notice of Auction and Sale Hearing [Docket No. 933; filed March 11, 2015]
- I. Notice of Change of Auction Location and Time [Docket No. 936; filed March 11, 2015]
- J. Notice of (I) Potential Assumption and Assignment of Executory Contracts and Unexpired Leases and (II) Cure Amounts [Docket No. 939; filed March 11, 2015]
- K. Notice of Hearing to Consider Proposed Break-Up Fee and Expense Reimbursement of Stalking Horse Purchaser in Connection with 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. 957; filed March 12, 2015]
- L. Notice of Revised Form of Proposed Sale Order [Docket No. 965; filed March 12, 2015]
- M. Notice of Filing of List of Retail Stores Subject to Stalking Horse Asset Purchase Agreement [Docket No. 1190; filed March 16, 2015]
- N. Adequate Assurance Information Related to Stalking Horse Purchaser [Docket No. 1192; filed March 16, 2015]
- O. Notice Regarding Valuation of Stalking Horse Bid [Docket No. 1193; filed March 16, 2015]

<u>Status</u>: This matter is going forward solely as it relates to the proposed breakup-fee and expense reimbursement for General Wireless, Inc.

2. Application for an Order Authorizing (I) the Debtors to Retain Maeva Group, LLC as Financial Advisors *Nunc Pro Tunc* to the Petition Date and (II) a Waiver of Certain Reporting Requirements Pursuant to Local Rule 2016-2(h) [Docket No. 274; filed February 15, 2015]

Objection/Response Deadline: February 25, 2015 at 4:00 p.m. (ET), extended to March 2, 2015 for the United States Trustee.

#### Objections/Responses Received:

A. Joint Omnibus Objection of SCP Lenders to Debtors' Applications to Retain (I) Maeva Group, LLC as Financial Advisor, (II) Lazard Frères & Co. LLC and Lazard Middle Market LLC as Investment Banker and (III) FTI Consulting, Inc as Interim Management Service Providers [Docket No. 560; Filed; February 25, 2015]

- B. Objection of Official Committee of Unsecured Creditors to Application for an Order Authorizing (I) the Debtors to Retain Maeva Group, LLC as Financial Advisors *Nunc Pro Tunc* to the Petition Date and (II) a Waiver of Certain Reporting Requirements Pursuant to Local Rule 2016-2(h) [Docket No. 685; filed February 27, 2015]
- C. Informal comments from the Office of the United States Trustee.

### **Related Documents**:

- A. Motion for Order Expediting Consideration of, and Shortening the Notice Period Applicable to, Application for an Order Authorizing (I) the Debtors to Retain Maeva Group, LLC as Financial Advisors *Nunc Pro Tunc* to the Petition Date and (II) a Waiver of Certain Reporting Requirements Pursuant to Local Rule 2016-2(h) [Docket No. 275; filed February 15, 2015]
- B. Order Expediting Consideration of, and Shortening the Notice Period Applicable to, Application for an Order Authorizing (I) the Debtors to Retain Maeva Group, LLC as Financial Advisor *Nunc Pro Tunc* to the Petition Date and (II) a Waiver of Certain Reporting Requirements Pursuant to Local Rule 2016-2(h) [Docket No. 469; entered February 20, 2015]
- C. Notice of Entry of Order and Hearing to Consider the Application for an Order Authorizing (I) the Debtors to Retain Maeva Group, LLC as Financial Advisors *Nunc Pro Tunc* to the Petition Date and (II) a Waiver of Certain Reporting Requirements Pursuant to Local Rule 2016-2(h) [Docket No. 490; filed February 20, 2015]
- D. Supplemental Declaration of Michael Cole in Support of Application for an Order Authorizing the Debtors (I) to Retain Maeva Group, LLC as Financial Advisors *Nunc Pro Tunc* to the Petition Date and (II) a Waiver of Certain Reporting Requirements Pursuant to Local Rule 2016-2(h) [Docket No. 775; filed March 3, 2015]

Status: Closing arguments on this matter are going forward.

3. The Official Committee of Unsecured Creditors' Opening Letter Brief Regarding Dispute Arising from the Committee's ongoing investigation under 11 U.S.C. § 1103(c)(2) and Fed. R. Bankr. P. 2004 [Docket No. 985; filed March 13, 2015]

Objection/Response Deadline: February 26, 2015 at 4:00 p.m. (ET).

Objections/Responses Received: Debtors' Answering Letter Brief Regarding Dispute

Arising from Committee Investigation under 11

U.S.C. § 1103(c)(2) and Fed. R. Bankr. P. 2004 [Docket No. 1177; filed March 16, 2015].

#### Related Document:

- A. Motion of Official Committee of Unsecured Creditors for an Order, Pursuant to Section 105(a) of the Bankruptcy Code, Bankruptcy Rule 2004, and Local Bankruptcy Rule 2004-1, Authorizing and Directing the Examination of the Debtors and Certain Third Parties [Docket No. 304; filed February 20, 2015]
- B. Order Pursuant to Section 105(a) of the Bankruptcy Code, Bankruptcy Rule 2004, and Local Bankruptcy Rule 2004-1, Authorizing and Directing the Examination of the Debtors and Certain Third Parties [Docket No. 941; entered March 12, 2015]

Status: This matter is going forward.

4. Motion of the Ad Hoc Committee of U.S. Dealers and Franchisees to Delay March 16, 2015 Payments, Enforce Payments of Administrative Expense Claims and Request for Related Relief [Docket No. 888; filed March 10, 2015]

Objection/Response Deadline: March 18, 2015 at 12:00 p.m. (ET).

Objections/Responses Received: None as of the filing of this agenda.

#### **Related Documents:**

- A. Motion to Shorten Notice on the Motion of the Ad Hoc Committee of U.S. Dealers and Franchisees to Delay March 16, 2015 Payments, Enforce Payments of Administrative Expense Claims and Request for Related Relief [Docket No. 889; filed March 10, 2015]
- B. Certification of Counsel Regarding Order Shortening Notice Period with Respect to the Motion of the Ad Hoc Committee of U.S. Dealers and Franchisees to Delay March 16, 2015 Payments, Enforce Payments of Administrative Expense Claims and Request for Related Relief [Docket No. 938; filed March 11, 2015]
- C. Order Approving Motion to Shorten Notice on the Motion of the Ad Hoc Committee of U.S. Dealers and Franchisees to Delay March 16, 2015 Payments, Enforce Payments of Administrative Expense Claims and Request for Related Relief [Docket No. 945; entered March 12, 2015]

Status: This matter is going forward.

Dated: March 17, 2015

Wilmington, Delaware

Respectfully submitted,

### /s/ Michael J. Custer

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