

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

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| In re | : | Chapter 11 |
| RADIOSHACK CORPORATION, <i>et al.</i> , ¹ | : | Case No. 15-10197 (BLS) |
| Debtors. | : | (Jointly Administered) |

NOTICE OF **SECOND AMENDED**² AGENDA OF MATTERS SCHEDULED FOR
HEARING ON MARCH 26, 2015 AT 10:30 A.M. (EASTERN TIME)³

**AT THE DIRECTION OF THE COURT THE
HEARING IS NOW SCHEDULED FOR 10:30 A.M. (ET)**

RESOLVED MATTER:

1. Application of Official Committee of Unsecured Creditors of RadioShack Corporation, *et al.*, Pursuant to Sections 328 and 1103 of the Bankruptcy Code, Bankruptcy Rules 2014(a), 2016, and 5002, and Local Bankruptcy Rules 2014-1 and 2016-2, Authorizing the Retention and Employment of Quinn Emanuel Urquhart & Sullivan, LLP as Co-Counsel, *Nunc Pro Tunc* to February 13, 2015 [Docket No. 696; filed February 27, 2015]

Objection/Response Deadline: March 13, 2015 at 4:00 p.m. (ET)

Objections/Responses Received: Informal comments from the United States Trustee.

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 March 26, 2015 hearing must contact CourtCall LLC at (866) 582-6878 by no later than March 25, 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*.

Related Documents:

- A. Amended Notice of Application and Hearing Thereon [Docket No. 831; filed March 5, 2015]
- B. Certification of Counsel Regarding Revised Proposed Order to the Application of Official Committee of Unsecured Creditors of RadioShack Corporation, *et al.*, Pursuant to Sections 328 and 1103 of the Bankruptcy Code, Bankruptcy Rules 2014(a), 2016, and 5002, and Local Bankruptcy Rules 2014-1 and 2016-2, Authorizing the Retention and Employment of Quinn Emanuel Urquhart & Sullivan, LLP as Co-Counsel, *Nunc Pro Tunc* to February 13, 2015 [Docket No. 1179; filed March 16, 2015]
- C. Order, Pursuant to Sections 328 and 1103 of the Bankruptcy Code, Bankruptcy Rules 2014(a), 2016, and 5002, and Local Bankruptcy Rules 2014-1 and 2016-2, Authorizing the Retention and Employment of Quinn Emanuel Urquhart & Sullivan, LLP as Co-Counsel, *Nunc Pro Tunc* to February 13, 2015 [Docket No. 1427; entered March 23, 2015]

Status: The Court has entered an Order approving the application. No hearing is necessary.

MATTERS WITH FILED CERTIFICATION OF COUNSEL:

- 2. Motion of Citibank, N.A. for Relief From Stay and Request for Adequate Protection and Other Relief [Docket No. 801; filed March 4, 2015]

Objection/Response Deadline: March 19, 2015 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents:

- A. [Proposed] Order Granting Motion of Citibank, N.A. for Relief from Stay, Request for Adequate Protection and Other Relief [Docket No. 1274; filed March 19, 2015]
- B. Certificate of No Objection Regarding Motion of Citibank, N.A. for Relief From Stay and Request for Adequate Protection and Other Relief [Docket No. 1432; filed March 23, 2015]
- C. Order Granting Motion of Citibank, N.A. for Relief from Stay, Request for Adequate Protection and Other Relief [Docket No. 1470; entered March 24, 2015]

Status: The Court has entered an order granting the motion. No hearing is necessary.

3. Application of Official Committee of Unsecured Creditors of RadioShack Corporation, *et al.*, for Entry of an Order Authorizing the Employment and Retention of Cooley LLP as Co-Counsel *Nunc Pro Tunc* to February 13, 2015 [Docket No. 828; filed March 5, 2015]

Objection/Response Deadline: March 19, 2015 at 4:00 p.m. (ET)

Objections/Responses Received: Informal comments from the United States Trustee.

Related Documents:

- A. Certification of Counsel Regarding Revised Proposed Order to the Application of Official Committee of Unsecured Creditors of RadioShack Corporation, *et al.*, for Entry of an Order Authorizing the Employment and Retention of Cooley LLP as Co-Counsel *Nunc Pro Tunc* to February 13, 2015 [Docket No. 1443; filed March 23, 2015]
- B. Order Authorizing the Employment and Retention of Cooley LLP as Co-Counsel for the Official Committee Of Unsecured Creditors [Docket No. 1472; entered March 24, 2015]

Status: The Court has entered an order granting the application. No hearing is necessary.

MATTERS GOING FORWARD:

4. Emergency Motion for the Entry of an Order Granting Cellco Partnership d/b/a Verizon Wireless: (I) Relief From the Automatic Stay, Pursuant to 11 U.S.C. § 362(d), to the Extent the Automatic Stay Applies, to Exercise Rights of Recoupment and/or Setoff; and (II) Related Relief [Docket No. 823; filed March 5, 2015] (the “Cellco Motion”)

Objection/Response Deadline: March 19, 2015 at 4:00 p.m. (ET)

Objections/Responses Received: Informal comments from the Debtors.

Related Documents:

- A. Declaration of Kirk D. Richert in Support of the Cellco Motion [Docket No. 825; filed March 5, 2015]
- B. Declaration of Keto Boykin in Support of the Cellco Motion [Docket No. 826; filed March 5, 2015]
- C. Certification of Counsel Regarding Emergency Motion for the Entry of an Order Granting Cellco Partnership d/b/a Verizon Wireless: (I) Relief From the Automatic Stay, Pursuant to 11 U.S.C. § 362(d), to the Extent the Automatic Stay Applies, to Exercise Rights of Recoupment and/or Setoff; and (II) Related Relief [Docket No. 1494; filed March 24, 2015]

Status: A certification of counsel has been filed together with a revised proposed form of order granting the motion. A hearing is only necessary to the extent the Court has any questions or concerns.

5. 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]

Cure Objection Deadline: March 16, 2015 at 4:00 p.m. (ET) (extended to March 19, 2015 at 4:00 p.m. (ET) for various parties)

Sale Objection Deadline: March 19, 2015 at 4:00 p.m. (ET)

Assumption/Assignment Objection Deadline: March 19, 2015 at 4:00 p.m. (ET)

Adequate Assurance Objection Deadline (Stalking Horse): March 24, 2015 at 4:00 p.m. (ET)

Landlords and Counterparties' Objections to Cure Amounts and/or Assumption and Assignment:

- See Exhibit 1 attached hereto.⁴

General Sale Objections:

- A. 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]
- B. Objection of Federal Warranty Service Corporation, et al. 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]
- C. Objection of Texas Ad Valorem Taxing Jurisdictions 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. 1040; filed March 16, 2015]
- D. Yakima County Treasurer's Formal Objection to Radioshack Corporation, et al., Notice of Auction and Sale Hearing [Docket No. 1281; filed March 19, 2015]

⁴ Objections and other responses of landlords and counterparties to cure amounts and/or assumption and assignment of leases or executory contracts, including challenges to adequate assurance of future performance, are listed on Exhibit 1 hereto. Some such objections may assert general sale objections.

- E. Digital Stream Technology's Limited Objection to 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. 1309; filed March 19, 2015]
- F. Objection to Debtors' Sale of Assets Pursuant to 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. 1333; filed March 19, 2015]
- G. Henrico County, Virginia's 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 Related Relief [Docket No. 1350; filed March 19, 2015]
- H. Local Texas Tax Authorities' 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. 1359; filed March 19, 2015]
- I. Ad Hoc Committee of U.S. Dealers and Franchisees' Objection to Debtors' Motion for Entry of an Order Approving the Sale of Assets [Docket No. 1392; filed March 20, 2015]
- J. State of Texas's Limited Objection to Sale of Personally Identifiable Information of One Hundred Seventeen Million Consumers [Docket No. 1393; filed March 20, 2015]
- K. Limited Objection and Reservation of Rights of AT&T Mobility, LLC to Debtors' Motion for Entry of Order Approving the Sale of Assets [Docket No. 1401; filed March 21, 2015]
- L. Joinder by State of Tennessee in State of Texas's Limited Objection to Sale of Personally Identifiable Information [Docket No. 1434; filed March 23, 2015]
- M. Objection, Reservation of Rights and Requests for Ancillary Relief of Cellco Partnership d/b/a Verizon Wireless and Various Subsidiaries of Verizon Communications, Inc. to Debtors' Motion for Entry of Order Approving the Sale of Assets [Docket No. 1345; filed March 19, 2015]
- N. Response and Limited Objection of Creditors Collin County Texas Tax Assessor/Collector, the City of Plano, Texas, the City of Garland, Texas, and the Garland Independent School District 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. 1463; filed March 24, 2015]

- O. Objection of Salus Capital Partners, LLC to Debtors' Sale Motion [Docket No. 1503; filed March 25, 2015]
- P. Supplement to Limited Objection Filed by the State Texas to Sale of Personally Identifiable Information of One Hundred Seventeen Million Consumers to Show Support by Twenty-One Governmental (Consumer Protection) Entities [Docket No. 1505; filed March 25, 2015]
- Q. Notice of Joinder by the Commonwealth of Pennsylvania in the State of Texas' Limited Objection to Sale of Personally Identifiable Information of One Hundred Seventeen Million Consumers [Docket No. 1517; filed March 25, 2015]
- R. State of Oregon's Joinder in State of Texas's Limited Objection to Sale of Personally Identifiable Information of One Hundred Seventeen Million Consumers [Docket No. 1520; filed March 25, 2015]

Related Documents:

- A. General Wireless, Inc.'s Notice of Filing of Alliance Agreement [Docket No. 544; filed February 24, 2015]
- B. Order Directing the United States Trustee to Appoint a Consumer Privacy Ombudsman [Docket No. 809; entered March 4, 2015]
- C. 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]
- D. Notice of Auction and Sale Hearing [Docket No. 933; filed March 11, 2015]
- E. Notice of Change of Auction Location and Time [Docket No. 936; filed March 11, 2015]
- F. Notice of (I) Potential Assumption and Assignment of Executory Contracts and Unexpired Leases and (II) Cure Amounts [Docket No. 939; filed March 11, 2015]
- G. Notice of Appointment of Consumer Privacy Ombudsman [Docket No. 953; entered March 12, 2015]
- H. Notice of Revised Form of Proposed Sale Order [Docket No. 965; filed March 12, 2015]
- I. Notice of Filing of List of Retail Stores Subject to Stalking Horse Asset Purchase Agreement [Docket No. 1190; filed March 16, 2015]

- J. Adequate Assurance Information Related to Stalking Horse Purchaser [Docket No. 1192; filed March 16, 2015]
- K. Notice Regarding Valuation of Stalking Horse Bid [Docket No. 1193; filed March 16, 2015]
- L. Notice of Filing of Statement of Analysis of Value of Stalking Horse Purchaser's Bid [Docket No. 1268; filed March 19, 2015]
- M. Letter to the Honorable Brendan L. Shannon from Elise Frejka, Consumer Privacy Ombudsman, Regarding Consumer Privacy Ombudsman Report [Docket No. 1513; filed March 25, 2015]

Status: This matter is going forward. The Debtors will request that the Court schedule a further hearing date to consider objections to cure amounts.

- 6. Motion of Salus Capital Partners, LLC, as Agent for SCP Lenders, for Entry of an Order Restricting Credit Bidding Rights Pursuant to Bankruptcy Code Sections 105(a) and 363(k) [Docket No. 1231; filed March 18, 2015]

Objection/Response Deadline: Time of hearing.

Objections/Responses Received:

- A. Response of Standard General L.P. to Motion of Salus Capital Partners, LLC, as Agent for SCP Lenders, for Entry of an Order Restricting Credit Bidding Rights [Docket No. 1531; filed March 25, 2015]
- B. Joint Response of the Administrative Agent for the Debtors Debtor-In-Possession Credit Facility and the First Out ABL Lenders to the Motion of Salus Capital Partners, LLC, as Agent for SCP Lenders, for Entry of an Order Restricting Credit Bidding Rights Pursuant to Bankruptcy Code Sections 105(a) and 363(k) [Docket No. 1532; filed March 25, 2015]

Related Documents:

- A. Adversary Complaint [Docket No. 1225; filed March 18, 2015]
- B. Motion of Salus Capital Partners, LLC, as Agent for SCP Lenders, for Entry of an Order (1) Shortening Notice Period Relating to Motion of Salus Capital Partners, LLC, as Agent for SCP Lenders, for Entry of an Order Restricting Credit Bidding Rights Pursuant to Bankruptcy Code Sections 105(a) and 363(k) [Docket No. 1232; filed March 18, 2015]
- C. Notice of Hearing Regarding Motion of Salus Capital Partners, LLC, as Agent for SCP Lenders, for Entry of an Order Restricting Credit Bidding Rights Pursuant to Bankruptcy Code Sections 105(a) and 363(k) [Docket No. 1394; filed March 20, 2015]

Status: This matter is going forward.

7. Debtors' Motion for an Order Authorizing and Approving the Settlement with AT&T and General Wireless Pursuant to Rule 9019 [Docket No. 1384; filed March 20, 2015]

Objection/Response Deadline: March 25, 2015 at 12:00 p.m. (noon) (ET)

Objections/Responses Received:

- A. Limited Response of the SCP Lenders to Debtors' Motion for an Order Authorizing and Approving the Settlement with AT&T and General Wireless Pursuant to Rule 9019 [Docket No. 1507; filed March 25, 2015]

Related Documents: None.

Status: This matter is going forward.

Dated: March 26, 2015
Wilmington, Delaware

Respectfully submitted,

/s/ Evelyn J. Meltzer
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