

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

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

NOTICE OF **AMENDED**² AGENDA OF MATTERS SCHEDULED FOR
HEARING ON MARCH 27, 2015 AT 8:30 A.M. (EASTERN TIME)³

**AT THE DIRECTION OF THE COURT, THE
HEARING TIME HAS BEEN CHANGED FROM
9:30 A.M. (ET) TO 8:30 A.M. (ET).**

**AT THE DIRECTION OF THE COURT, UPON
CONCLUSION OF THE MATTERS SET FORTH
BELOW, THE HEARING ON THE MATTERS SET
FORTH IN THE MARCH 26, 2015 SECOND AMENDED
AGENDA (DOCKET NO. 1550) WILL RESUME.**

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 27, 2015 hearing must contact CourtCall LLC at (866) 582-6878 by no later than March 26, 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*.

UNCONTESTED MATTERS GOING FORWARD:

1. Sprint Solutions, Inc.'s Motion for Relief from the Automatic Stay to Exercise Rights of Setoff [Docket No. 843; Filed March 6, 2015]

Objection/Response Deadline: March 20, 2015 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents:

- A. Declaration of Pierre Elisseff in Support of Sprint Solutions, Inc.'s Motion for Relief from the Automatic Stay to Exercise Rights of Setoff [Docket No. 844; filed March 6, 2015]
- B. Certification of Counsel Regarding Form of Order Resolving Sprint Solutions, Inc.'s Motion for Relief from the Automatic Stay to Exercise Rights of Setoff [Docket No. 1538; filed March 25, 2015]**

Status: An agreed form of order has been submitted under Certification of Counsel. This Matter will go forward only if the Court has any questions or concerns.

2. Notice #1 of Intent to Assume and Assign Non-Residential Real Property Leases Pursuant to Designation Rights Agreement [Docket No. 1265; filed March 18, 2015]

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

Sale Objections/Responses Received: **Objection of Inland TRS Property Management, Inc. to Notice #1 of Intent to Assume and Assign Non-Residential Real Property Leases Pursuant to Designation Rights Agreement [Docket No. 1521; filed March 25, 2015]**

Related Documents:

- A. 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. 220; filed February 12, 2015]

- B. Amended Order (I) Approving Bid and Sale Procedures with Respect to Nonresidential Property Leases and Lease Designation Rights, (II) Approving Cure Procedures and Related Notice Procedures; (III) Scheduling an Auction and Sale Hearing and (IV) Granting Related Relief [Docket No. 457; entered February 20, 2015]
- C. Initial Bid Report for Sale of Leases and/or Lease Designation Rights [Docket No. 498; filed February 21, 2015]
- D. Amended Initial Bid Report for Sale of Leases and/or Lease Designation Rights [Docket No. 499; filed February 21, 2015]
- E. Notice of Successful Bid for Real Property Lease Designation Rights [Docket No. 611; filed February 25, 2015]
- F. Signed Order Pursuant to Sections 105(a), 363 and 365 of the Bankruptcy Code (I) Authorizing the Debtors to Enter into Designation Rights Agreement; (II) Authorizing the Debtors to Sell Designation Rights; (III) Approving the Assumption and Assignment Procedures Set Forth Herein; and (IV) Granting Other Related Relief [Docket No. 666; entered February 27, 2015]
- G. Notice of Removal of Lease Related to Store No. 3784 from Notice of #1 of Intent to Assume and Assign Non-Residential Real Property Leases Pursuant to Designation Rights Agreement [Docket No. 1574; filed March 26, 2015]**
- H. Certification of Counsel Regarding Revised Proposed Order Pursuant to 11 U.S.C. §§ 105(A), 363 and 365 and Fed. R. Bankr. P. 2002 and 6006: (I) Approving the Debtors' Assumption and Assignment of Unexpired Leases of Nonresidential Real Property to Spring Communications Holding, Inc.; and (II) Granting Related Relief [Docket No. 1575; filed March 26, 2015]**

Status:

The objection of Inland TRS Property Management, Inc. [D.I. 1521] is adjourned to the April 14, 2015 omnibus hearing. An agreed form of order has been submitted under Certification of Counsel for the uncontested assignments only. This matter will go forward only if the Court has any questions or concerns.

CONTESTED MATTER GOING FORWARD:

3. Debtors' Second Motion for (I) an Order (A) Establishing Bid Procedures for the Sale of Certain Lease Assets, and (B) Granting Certain Related Relief and (II) an Order (A) Approving the Sale of Certain Lease Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests, and (B) Granting Certain Related Relief [Docket No. 779; filed March 3, 2015]

Objection/Response Deadline: March 24, 2015 at 12:00 p.m. (ET) for the Round Two Lease Sale Cure Objections; March 26, 2015 at 4:00 p.m. (ET) for the Round Two Lease Sale General Objections

Cure Objections/Responses Received:

- A. Objection of Alejo/Alvarez Investment, Inc. to the Notice of Cure Amounts [Docket No. 1271; filed March 19, 2015]
- B. Objection of Kroger Limited Partnership I to Cure Claim in Debtors' Motion for Order (I) Approving Bid and Sale Procedures with Respect to Certain Lease Assets (II) Approving Cure Procedures and Related Notice Procedures, (III) Scheduling an Auction and Sale Hearing and (IV) Granting Relief (Round II Sale) [Docket No. 1340; filed March 19, 2015]
- C. Objection of THF/MRP Tiger Town, LLC to Debtors' Stated Cure Amounts as Set Forth Debtors' Second Motion for (I) an Order (A) Establishing Bid Procedures for the Sale of Certain Lease Assets, and (B) Granting Certain Related Relief and (II) an Order (A) Approving the Sale of Certain Lease Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests, and (B) Granting Certain Related Relief [Docket No. 1388; filed March 20, 2015]
- D. Objection of Lindell Market Place, LP to Debtors' Second Motion for (I) an Order (A) Establishing Bid Procedures for the Sale of Certain Lease Assets, and (B) Granting Certain Related Relief and (II) an Order (A) Approving the Sale of Certain Lease Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests, and (B) Granting Certain Related Relief [Docket No. 1389; filed March 20, 2015]
- E. The KHEDR Family Trust Objects to Debtors' Stated Cure Amount [Docket No. 1418; filed March 23, 2015]
- F. Joinder and Objection of Redman Associates to Cure Amounts and Proposed Sale of Lease Rights [Docket No. 1419; filed March 23, 2015]
- G. Objection by Westfield, LLC, Benenson Capital Company LLC, and Certain of Their Respective Affiliates to Debtors' Proposed Cure Amounts Pursuant to Debtors' Second Motion for (I) an Order (A) Establishing Bid

Procedures for the Sale of Certain Lease Assets, and (B) Granting Certain Related Relief and (II) an Order (A) Approving the Sale of Certain Lease Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests, and (B) Granting Certain Related Relief [Docket No. 1444; filed March 23, 2015]

- H. Objection of Brixmor Property Group, Inc., DLC Management Corp., Phillips Edison & Company, Federal Realty Investment Trust, Sedrak Partners Limited, the Trustees of the University of Pennsylvania and WP Realty, Inc. to Debtors' Second Motion for (I) an Order (A) Establishing Bid Procedures for the Sale of Certain Lease Assets, and (B) Granting Certain Related Relief and (II) an Order (A) Approving the Sale of Certain Lease Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests (B) Granting Certain Related Relief [Docket No. 1453; filed March 24, 2015]
- I. Objection of Bayshore Associates, LLC to Proposed Cure Amounts in Connection with the Debtors' Second Motion for (I) an Order (A) Establishing Bid Procedures for the Sale of Certain Lease Assets, and (B) Granting Certain Related Relief and (II) an Order (A) Approving the Sale of Certain Lease Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests and (B) Granting Certain Related Relief [Docket No. 1464; filed March 24, 2015]
- J. Southwood Associates, LLC's Objection to the Proposed Cure Amount Regarding the Assumption and Assignment of Its Real Property Lease with RadioShack Store #1762 [Docket No. 1466; filed March 24, 2015]
- K. Joinder and Limited Objection of Kimco Realty Corporation to Debtors' Cure Amounts for Second Round Sale of Leases [Docket No. 1468; filed March 24, 2015]
- L. Objection of Westover Eagle Harbor, LLC, Wilcut Joint Venture, Hamco Realty Hopkinsville, LLC and Merge Holdings, LLC to Debtors' Second Motion for (I) an Order (A) Establishing Bid Procedures for the Sale of Certain Lease Assets, and (B) Granting Certain Related Relief and (II) an Order (A) Approving the Sale of Certain Lease Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests and (B) Granting Certain Related Relief [Docket No. 1469; filed March 24, 2015]
- M. Objection of Empresas Puertorriqueñas de Desarrollo, Inc. with Respect to the Debtors' Second Motion for (I) an Order (A) Establishing Bid Procedures for the Sale of Certain of Lease Assets, and (B) Granting Certain Related Relief and (II) an Order (A) Approving the Sale of Certain Lease Assets 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. 1474; filed March 24, 2015]

- N. Objection of GGP Limited Partnership and DDR Corp. to (1) the Debtors' Second Motion for (I) an Order (A) Establishing Bid Procedures for the Sale of Certain Lease Assets, and (B) Granting Certain Related Relief and (II) an Order (A) Approving the Sale of Certain Lease Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests, and (B) Granting Certain Related Relief, and (2) the Debtors' Proposed Cure Amounts [Docket No. 1491; filed March 24, 2015]

Lease Sale Objections/Responses Received:

- A. Limited Objection and Reservation of Rights of THF Glen Carbon Development, LLC to Debtors' Second Motion for (I) an Order (A) Establishing Bid Procedures for the Sale of Certain Lease Assets, and (B) Granting Certain Related Relief and (II) an Order (A) Approving the Sale of Certain Lease Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests, and (B) Granting Certain Related Relief [Docket No. 1387; filed March 20, 2015]
- B. Objection of the Macerich Company, Starwood Retail Partners LLC, Centennial Real Estate Company, LLC, the Prudential Insurance Company of America, and Watt Management Company to the (1) Debtors' Second Motion for (I) an Order (A) Establishing Bid Procedures for the Sale of Certain Lease Assets, and (B) Granting Certain Related Relief and (II) an Order (A) Approving the Sale of Certain Lease Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests, and (B) Granting Certain Related Relief, and (2) Proposed Cure Amounts [Docket No. 1424; filed March 23, 2015]

Related Documents:

- A. Motion for Order Expediting Consideration of, and Shortening the Notice Period Applicable to, Debtors' Second Motion For (I) an Order (A) Establishing Bid Procedures for the Sale of Certain Lease Assets, and (B) Granting Certain Related Relief and (II) an Order (A) Approving the Sale of Certain Lease Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests, and (B) Granting Certain Related Relief [Docket No. 781; filed March 3, 2015]
- B. Notice of Filing of Supplemental "Exhibit C" to Debtors' Second Motion for (I) an Order (A) Establishing Bid Procedures for the Sale of Certain Lease Assets, and (B) Granting Certain Related Relief and (II) an Order (A) Approving the Sale of Certain Lease Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests and (B) Granting Certain Related Relief [Docket No. 784; March 3, 2015]
- C. Order Expediting Consideration of, and Shortening the Notice Period Applicable to, Debtors' Second Motion for Order Expediting

Consideration of, and Shortening the Notice Period Applicable to, Debtors' Second Motion For (I) an Order (A) Establishing Bid Procedures for the Sale of Certain Lease Assets, and (B) Granting Certain Related Relief and (II) an Order (A) Approving the Sale of Certain Lease Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests, and (B) Granting Certain Related Relief [Docket No. 804; entered March 4, 2015]

- D. Notice of Hearing on Debtors' Second Motion for (I) an Order (A) Establishing Bid Procedures for the Sale of Certain Lease Assets, and (B) Granting Certain Related Relief and (II) an Order (A) Approving the Sale of Certain Lease Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests, and (B) Granting Certain Related Relief [Docket No. 816; filed March 4, 2015]
- E. Notice of Filing of Cure Schedule Amendments in Connection with Debtors' Second Motion for (I) an Order (A) Establishing Bid Procedures for the Sale of Certain Lease Assets, and (B) Granting Certain Related Relief and (II) an Order (A) Approving the Sale of Certain Lease Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests, and (B) Granting Certain Related Relief [Docket No. 907; filed March 10, 2015]
- F. Order (I) Approving Bid and Sale Procedures with Respect to the Sale of Certain Lease Assets, (II) Approving Cure Procedures and Related Notice Procedures; (III) Scheduling an Auction and Sale Hearing and (IV) Granting Related Relief [Docket No. 946; entered March 12, 2015]
- G. Initial Bid Report for Round Two Sale of Leases [Docket No. 1403; filed March 22, 2015]
- H. Notice of Cancellation and Amended Initial Bid Report for Round Two Sale of Leases [Docket No. 1497; filed March 24, 2015]
- I. Notice of Successful Bid for Lease in Round Two Lease Sale (Store Numbers 2624) [Docket No. 1533; Filed March 25, 2015]**
- J. Notice of Successful Bids for Leases in Round Two Lease Sale (Store Numbers 9553 and 9572) [Docket No. 1560; Filed March 26, 2015]**
- K. Notice of Successful Bids for Leases in Round Two Lease Sale (Store Numbers 1116 and 8897) [Docket No. 1561; Filed March 26, 2015]**
- L. Declaration of Michael Jerbich in Support of Proposed Sale Orders for Second Round Lease Sales [Docket No. 1571; filed March 26, 2015]**

- M. **Certification of Counsel Regarding Proposed Sale Order for Round Two Lease Sale (Store Number 2624) [Docket No. 1572; filed March 26, 2015]**
- N. **Certification of Counsel Regarding Proposed Sale Order for Round Two Lease Sale (Store Numbers 1116 and 8897) [Docket No. 1577; filed March 26, 2015]**

Status:

This matter is going forward solely with respect to Store Numbers 2624, 1116, 8897, 9553 and 9572. Agreed forms of orders have been submitted under Certification of Counsel for Store Numbers 2624, 1116 and 8897. These matters will go forward only if the Court has any questions or concerns. At the hearing, the Debtors intend to present the Court with a proposed sale order for Store Numbers 9553 and 9572.

Dated: March 26, 2015
Wilmington, Delaware

Respectfully submitted,

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