

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 12, 2015 AT 9:00 A.M. (EASTERN TIME)³

CONTINUED MATTER:

1. Motion by Farmers New Century Insurance Company as Subrogee of Diane Anderson and Diane Anderson, in Her Own Right for Relief From the Automatic Stay Under 11 U.S.C. § 362 [Docket No. 444; filed February 20, 2015]

Objection/Response Deadline: March 10, 2015 at 10:00 a.m. (ET), extended to March 31, 2015 at 4:00 p.m. (ET) for the Debtors.

Objections/Responses Received: None at the time of filing the Agenda.

Related Documents: Motion for Order Expediting Consideration of, and Shortening the Notice Period Applicable to, Motion by Farmers New Century Insurance Company as Subrogee of Diane Anderson and Diane Anderson, in Her Own Right for Relief from the Automatic Stay Under 11 U.S.C. § 362 [Docket No. 448; filed February 20, 2015]

Status: This matter is continued to the April 14, 2015 hearing at 10:00 a.m. (ET).

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 12, 2015 hearing must contact CourtCall LLC at (866) 582-6878 by no later than March 11, 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:

2. 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 10, 2015 at 12:00 p.m. (ET)

Objections/Responses Received:

- A. **Limited Objection by Cape Town Plaza 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. 904; filed March 10, 2015] (RESOLVED)**
- B. **Joinder in the Limited Objection of Cape Town Plaza 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. 910; filed March 11, 2015]**
- C. **Objection of the Macerich Company, Starwood Retail Partners LLP, Watt Management Company, Centennial Real Estate Company, LLC, and the Prudential Insurance Company of America to 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. 911; filed March 11, 2015]**
- D. **Joinder and Limited Objection of Kimco Realty Corp. and Gibraltar Management Co., Inc. to 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. 920; filed March 11, 2015]**

- E. Joinder of the Meadowbrook Mall Company to Certain Landlords Objections to Debtors' Second Motion for 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 Debtors' Nonresidential Real Property Leases Free and Clear of Liens and encumbrances and Other Interests and (B) Granting Certain Related Relief [Docket No. 922; filed March 11, 2015]**
- F. Joinder of the Benderson Development Company, Inc to Certain Landlords Objections to Debtors Second Motion for 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 Debtors Nonresidential Real Property Leases Free and Clear of Liens and Encumbrances and Other Interests and (B) Granting Certain Related Relief [Docket No. 923; filed March 11, 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; filed March 3, 2015]
- C. Signed 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]

Status: This matter is going forward.

RESOLVED MATTERS GOING FORWARD:

3. 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]

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

Sale Objections/Responses Received: Woodrow Court, Inc.'s Objection to Debtors' Notice of Sale, Assumption, and Assignment of the Nonresidential Real Property Lease for Store Number 2835 [Docket No. 651; filed February 26, 2015]

Related Documents:

- A. Emergency Motion for Interim and Final Orders: (I) Authorizing the Debtors to Assume the Consulting Agreement; (II) Authorizing and Approving the Conduct of Store Closing or Similar Themed Sales, with Such Sales to be Free and Clear of All Liens, Claims and Encumbrances; (III) Authorizing Customary Bonuses to Employees of Closing Business Locations; and (IV) Granting Related Relief [Docket No. 18; filed February 5, 2015]
- B. Motion for Order Expediting Consideration of, and Shortening the Notice Period Applicable 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. 221; filed February 12, 2015]
- C. 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; filed February 20, 2015]

- D. Notice of Successful Bid for Lease (Store Number 2835) [Docket No. 614; filed February 25, 2015]
- E. Signed Order Authorizing (I) the Sale of Certain of the Debtors' Nonresidential Real Property Lease Pursuant to Lease Termination Agreements; and (II) Granting Related Relief [Docket No. 665; entered February 27, 2015]
- F. 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. Signed Order Authorizing the (I) the Sale of the Debtors' Nonresidential Real Property Lease for Store Number 8317 Free and Clear of All Claims, Liens, Liabilities, Rights, Interests and Encumbrances; (II) the Debtors to Assume and Assign the Lease; and (III) Granting Related Relief [Docket No. 667; filed February 27, 2015]
- H. Certification of Counsel Regarding Order Authorizing (I) the Sale of the Debtors' Nonresidential Real Property Lease for Store Number 2835 Free and Clear of all Claims, Liens, Liabilities, Rights, Interests and Encumbrances; (II) the Debtors to Assume and Assign the Lease; and (III) Granting Related Relief [Docket No. 929; filed March 11, 2015]**

Status: **A Certification of Counsel has been filed together with a revised form of proposed order resolving Woodrow Court, Inc.'s objection with respect to Store Number 2835. Consequently, a hearing with respect to this matter is required only if the Court has any questions or concerns.**

- 4. Application for an Order Authorizing (I) the Debtors to Retain A&G Realty Partners, LLC as a Real Estate Consultant and 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. 492; filed February 20, 2015]

Objection/Response Deadline: March 5, 2015 at 4:00 p.m. (ET)

Objections/Responses Received:

A. Informal comments from the Office of the United States Trustee.

B. Informal comments from the Official Committee of Unsecured Creditors.

Related Documents:

- A. Supplemental Declaration of Andrew Graiser in Support of Application for an Order Authorizing the Debtors (I) to Retain A&G Realty Partners, LLC as a Real Estate Consultant and 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. 762; filed March 3, 2015]

- B. Certification of Counsel Regarding Revised Proposed Order Authorizing the Debtors (I) to Retain A&G Realty Partners, LLC as a Real Estate Consultant and Advisor to the Debtors *Nunc Pro Tunc* to the Petition Date and (II) a Waiver of Certain Reporting Requirements Pursuant to Local Rule 2016-2(h) [Docket No. 926; filed March 11, 2015]**

Status: **A Certification of Counsel has been filed together with a revised form of proposed order reflecting the United States Trustee's and the Official Committee of Unsecured Creditors' comments. Consequently, a hearing with respect to this matter is required only if the Court has any questions or concerns.**

CONTESTED MATTERS GOING FORWARD:

- 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]

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]

- 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 Urbancaal 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. 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) Approved 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. Signed 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]

Status: This matter is going forward solely as it relates to the Sprint Expense Reimbursement. **The only Objections and Responses above that relate to the Sprint Expense Reimbursement are A, T, Y, and DD.**

- 6. 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(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]
- G. Motion of Official Committee of Unsecured Creditors Pursuant to 11 U.S.C. § 105(a), Rule 60(b) of the Federal Rules of Civil Procedure, Rule 9024 of the Federal Rules of Bankruptcy Procedure, and Rule 4001-2(b) of the Local Rules of the United States Bankruptcy Court for the District of Delaware for Reconsideration of the Courts Interim DIP Financing Order [Docket No. 535; filed February 24, 2015]
- H. Certification of Counsel Regarding Revised Proposed Final Order (I) Authorizing the Debtors to (A) Obtain Financing and (B) Utilize Cash

Collateral of Pre-Petition Secured Parties, (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) [Docket No. 836; Filed March 6, 2015]

- I. Final Order (I) Authorizing the Debtors to (A) Obtain Financing and (B) Utilize Cash Collateral of Pre-Petition Secured Parties, (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) [Docket No. 839; entered March 6, 2015]

Status: This matter is going forward as a status conference and to address any remaining open issues.

7. 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. Signed 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: This matter is going forward.

- 8. Application for an Order Authorizing (I) the Debtors to Retain DJM Realty Services, LLC as a Real Estate Consultant and 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. 495; filed February 20, 2015]

Objection/Response Deadline: March 5, 2015 at 4:00 p.m. (ET)

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

Related Document: Certification of Counsel Regarding Revised Proposed Order Authorizing the Debtors (I) to Retain DJM Realty Services, LLC as a Real Estate Consultant and Advisor to the Debtors, *Nunc Pro Tunc* to the Petition Date and (II) a Waiver of Certain Reporting Requirements Pursuant to Local Rule 2016-2(h) [Docket No. 909; filed March 11, 2015]

Status: A Certification of Counsel has been filed together with a revised form of proposed order reflecting the United States Trustee's comments. Consequently, a hearing with respect to this matter is required only if the Court has any questions or concerns.

- 9. Application of the Debtors for an Order Authorizing Them to Retain and Employ KPMG LLP as a Tax Advisor, *Nunc Pro Tunc* as of the Petition Date [Docket No. 496; filed February 20, 2015]

Objection/Response Deadline: March 5, 2015 at 4:00 p.m. (ET)

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

Related Document: **Certification of Counsel Regarding Revised Proposed Order Authorizing the Debtors to Retain KPMG LLP as a Tax Advisor, *Nunc Pro Tunc* as of the Petition Date [Docket No. 927; filed March 11, 2015]**

Status: **A Certification of Counsel has been filed together with a revised form of proposed order reflecting the United States Trustee's comments. Consequently, a hearing with respect to this matter is required only if the Court has any questions or concerns.**

10. Motion Authorizing the Debtors to Retain, *Nunc Pro Tunc* as of the Petition Date, and Pay Professionals Utilized in the Ordinary Course of Business [Docket No. 497; filed February 20, 2015]

Objection/Response Deadline: March 5, 2015 at 4:00 p.m. (ET), extended to March 6, 2015 at 4:00 p.m. (ET) for the Official Committee of Unsecured Creditors and the United States Trustee.

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

Related Documents: None.

Status: This matter is going forward.

Dated: March 11, 2015
Wilmington, Delaware

Respectfully submitted,

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