

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHERN DIVISION**

In re:

REMINGTON OUTDOOR COMPANY,
INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 20-81688-CRJ11

Jointly Administered

**NOTICE OF HEARING TO CONSIDER DEBTORS' MOTION FOR (I) AN ORDER
ESTABLISHING BIDDING PROCEDURES AND GRANTING RELATED RELIEF AND
(II) AN ORDER OR ORDERS APPROVING THE SALE OF THE DEBTORS' ASSETS**

PLEASE TAKE NOTICE that on July 28, 2020, the Debtors filed the *Debtors' Motion for (I) An Order Establishing Bidding Procedures and Granting Related Relief and (II) An Order or Orders Approving The Sale of The Debtors' Assets* (the "**Motion**")² [Docket No. 29] with the United States Bankruptcy Court for the Northern District of Alabama (the "**Bankruptcy Court**"). By this Motion, the Debtors are seeking, among other things, entry of an order (the "**Bidding Procedures Order**"): (i) approving the proposed bidding procedures by which the Debtors will solicit and select the highest or otherwise best offer for the sale of substantially all or a portion of their assets (the "**Acquired Assets**") through one or more sales of the Acquired Assets (each, a "**Sale**"); (ii) establishing procedures for the assumption and assignment of executory contracts and unexpired leases, including notice of proposed cure amounts; (iii) approving the form and manner of notice with respect to certain procedures, protections, schedules, and agreements, including the Debtors' selection of one or more stalking horse bidders (each, a "**Stalking Horse Bidder**"), if any, and the provision of Bid Protections to such Stalking Horse Bidder, if necessary; (iv) scheduling (a) an auction (the "**Auction**") if the Debtors receive two (2) or more timely and acceptable Qualified Bids, and (b) a final hearing to approve one or more Sales of the Acquired Assets; and (v) granting related relief.

PLEASE TAKE FURTHER NOTICE that any response or objection to the entry of the Bidding Procedures Order with respect to the relief sought in the Motion must (1) state, with specificity, the legal and factual basis for the objection, (2) include appropriate documentation in support thereof, and (3) be filed in writing with the Bankruptcy Clerk's Office and served on the

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Remington Outdoor Company, Inc. (4491); FGI Holding Company, LLC (9899); FGI Operating Company, LLC (9774); Remington Arms Company, LLC (0935); Barnes Bullets, LLC (8510); TMRI, Inc. (3522); RA Brands, L.L.C. (1477); FGI Finance, Inc. (0109); Remington Arms Distribution Company, LLC (4655); Huntsville Holdings LLC (3525); 32E Productions, LLC (2381); Great Outdoors Holdco, LLC (7744); and Outdoor Services, LLC (2405). The Debtors' corporate headquarters is located at 100 Electronics Blvd SW, Huntsville, Alabama 35824.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

Objection Recipients no later than **5:00 p.m. (prevailing Central Time) on August 7, 2020** (the “**Objection Deadline**”). Any objection of the Committee to the entry of the Bidding Procedures Order with respect to the relief sought in the Motion must (1) state, with specificity, the legal and factual basis for the objection, (2) include appropriate documentation in support thereof, and (3) be filed in writing with the Bankruptcy Clerk’s Office and served on the Objection Recipients no later than **12:00 p.m. (prevailing Central Time) on August 10, 2020** (the “**Committee Objection Deadline**”).

PLEASE TAKE FURTHER NOTICE that the Objection Recipients are: (i) counsel for the Debtors, O’Melveny & Myers LLP, 400 South Hope Street, 18th Floor, Los Angeles, CA 90071, Attn: Steve Warren (swarren@omm.com) and Jennifer Taylor (jtaylor@omm.com); (ii) co-counsel for the Debtors, Burr & Forman LLP, 420 North 20th Street, Suite 3400, Birmingham, Alabama 35203, Attn: Derek Meek (dmeek@burr.com) and Hanna Lahr (hlahr@burr.com); (iii) counsel for the Restructuring Committee, Akin Gump Strauss Hauer & Feld LLP, 2300 N. Field Street, Suite 1800, Dallas, TX 75201, Attn: Sarah Schultz (sschultz@akingump.com); (iv) the Bankruptcy Administrator, 400 Well Street, Decatur, Alabama 35602, Attn: Richard Blythe (richard_blythe@alnb.uscourts.gov); (v) counsel to the FILO Lenders, Pillsbury Winthrop Shaw Pittman LLP, Four Embarcadero Center, 22nd Floor, San Francisco, CA 94111-5998, Attn: Joshua D. Morse (joshua.morse@pillsburylaw.com) and Andrew V. Alfano (andrew.alfano@pillsburylaw.com); (vi) counsel to Whitebox Advisors LLC, Brown Rudnick LLP, One Financial Center, Boston, Massachusetts 02111, Attn: Andreas Andromalos (aandromalos@brownrudnick.com) and Tia C. Wallach (twallach@brownrudnick.com); and (vii) all parties that have requested notice in the Chapter 11 Cases.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE MOTION AND ENTER THE BIDDING PROCEDURES ORDER WITHOUT FURTHER NOTICE OR HEARING.

PLEASE TAKE FURTHER NOTICE that the Court will hold a telephonic hearing to consider entry of the Bidding Procedures Order with respect to the relief sought in the Motion before the Honorable Clifton R. Jessup, Jr., United States Bankruptcy Judge, on **August 11, 2020 at 9:00 a.m. (prevailing Central Time)**. The hearing will be held via AT&T call-in number. The dial-in number is **1-877-336-1280**. When prompted, enter the access code **#2749965**. There is no security code, and please do not select any other feature. Parties should call in **five minutes** prior to the start of the hearing. Once connected, please mute your phone until your case is called. To avoid disruption, telephonic hearing participants are expected to call from a quiet location and are not permitted to use a “speaker” function or to place the call on hold (as this may cause music or other noises to play during the hearings of other participants). Participants are encouraged to call from a landline if possible.

PLEASE TAKE FURTHER NOTICE THAT THIS HEARING WILL TAKE PLACE BY TELEPHONE ONLY. PLEASE SEE THE COURT'S WEBSITE FOR ADDITIONAL INFORMATION (www.alnb.uscourts.gov).

Dated: July 30, 2020

/s/ Derek F. Meek

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