

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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: Chapter 11
:
In re: : Case No. 20-12625 (KBO)
: (Jointly Administered)
SMARTOURS, LLC, *et al*, :
:
Debtors.¹ : Hearing Date: November 17, 2020 at 1:00 p.m.
: Obj. Deadline: November 12, 2020 at 4:00 p.m.
:
: Re: Docket Nos. 62, 63, 64, 65 & 66
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NOTICE OF HEARING REGARDING DEBTORS' MOTION FOR ENTRY OF AN ORDER (I) APPROVING DISCLOSURE STATEMENT, (II) APPROVING SOLICITATION PROCEDURES, (III) APPROVING FORM OF BALLOTS AND NOTICES IN CONNECTION THEREWITH, (IV) ESTABLISHING PLAN CONFIRMATION SCHEDULE, AND (V) GRANTING RELATED RELIEF

PLEASE TAKE NOTICE that, on October 26, 2020, the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) filed the *Joint Chapter 11 Plan of Reorganization of smarTours, LLC and its Debtor Affiliate* [D.I. 62] (the “Plan”).

PLEASE TAKE FURTHER NOTICE that, on October 26, 2020, Debtors filed the *Disclosure Statement for Joint Chapter 11 Plan of Reorganization of smarTours, LLC and its Debtor Affiliate* [D.I. 63] (the “Disclosure Statement”).

PLEASE TAKE FURTHER NOTICE that, on October 26, 2020, Debtors filed the *Debtors' Motion for Entry of an Order (I) Approving Disclosure Statement, (II) Approving Solicitation Procedures, (III) Approving Form of Ballots and Notices in Connection Therewith, (IV) Establishing Plan Confirmation Schedule, and (V) Granting Related Relief* [D.I. 64] (the “Motion to Approve”).

PLEASE TAKE FURTHER NOTICE that, on October 26, 2020, Debtors filed the *Debtors' Assented to Motion to Shorten Notice With Respect to the Debtors' Motion for Entry of an Order (I) Approving Disclosure Statement, (II) Approving Solicitation Procedures, (III) Approving Form of Ballots and Notices in Connection Therewith, (IV) Establishing Plan Confirmation Schedule, and (V) Granting Related Relief* [D.I. 65] (the “Motion to Shorten”).

PLEASE TAKE FURTHER NOTICE that, on October 27, 2020, the United States Bankruptcy Court for the District of Delaware entered the *Order Shortening the Notice Periods*

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: smarTours, LLC (6681); and SPST Holdings, LLC (9027).

With Respect to the Debtors' Motion for Entry of an Order (I) Approving Disclosure Statement, (II) Approving Solicitation Procedures, (III) Approving Form of Ballots and Notices in Connection Therewith, (IV) Establishing Plan Confirmation Schedule, and (V) Granting Related Relief [D.I. 66] (the "Order to Shorten") attached hereto as Exhibit "A". Copies of the Plan, Disclosure Statement, Motion to Approve, and the Order to Shorten and all other documents filed in the Debtors' chapter 11 cases are available at www.primeclerk.com/smartours.

PLEASE TAKE FURTHER NOTICE that, objections, if any, to the entry of an order approving the Motion to Approve must be filed on or before **November 12, 2020 at 4:00 p.m. (prevailing Eastern Time)** (the "Objection Deadline") with the United States Bankruptcy Court for the District of Delaware, 3rd Floor, 824 North Market Street, Wilmington, Delaware, 19801. At the same time, you must serve a copy of the objection upon the following parties so as to be received on or before the Objection Deadline:

- (i) proposed counsel to the Debtors: (a) 55 West 46th Street, New York, NY 10036, Attn: Christopher M. Desiderio, Esq., Christopher J. Fong, Esq.; (b) Nixon Peabody LLP, 53 State Street, Boston, Massachusetts 02109, Attn: Richard C. Pedone, Esq.; and (c) Cross & Simon, LLC, 1105 N. Market Street, Suite 901, Wilmington, DE 19801, Attn: Christopher P. Simon, Esq. and Kevin S. Mann, Esq;
- (ii) the Office of the United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801 (Attn: David Buchbinder, Esq.); and
- (iii) counsel for any statutory committee appointed in these cases.

PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE MOTION TO APPROVE WILL BE HELD NOVEMBER 17, 2020 AT 1:00 P.M. (prevailing Eastern Time) BEFORE THE HONORABLE KAREN B. OWENS, JUDGE, UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 6TH FLOOR, COURTROOM NO. 3, 824 NORTH MARKET STREET, WILMINGTON, DELAWARE, 19801.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED AND ENTER A FINAL ORDER WITHOUT FURTHER NOTICE OF HEARING.

Dated: October 27, 2020
Wilmington, Delaware

CROSS & SIMON, LLC

/s/ Kevin S. Mann

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*Proposed Co-Counsel to the Debtors and
Debtors in Possession*

Exhibit "A"

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

-----X
In re: : **Chapter 11**
: :
SMARTOURS, LLC, et al, : **Case No. 20-12625 (KBO)**
: :
: **Jointly Administered**
: :
Debtors.¹ : **Re: Docket No. 65**
-----X

ORDER SHORTENING THE NOTICE PERIODS WITH RESPECT TO THE DEBTORS’ MOTION FOR ENTRY OF AN ORDER (I) APPROVING DISCLOSURE STATEMENT, (II) APPROVING SOLICITATION PROCEDURES, (III) APPROVING FORM OF BALLOTS AND NOTICES IN CONNECTION THEREWITH, (IV) ESTABLISHING PLAN CONFIRMATION SCHEDULE, AND (V) GRANTING RELATED RELIEF

Upon the motion (the “Motion to Shorten”)² filed by smarTours, LLC (“smarTours” or the “Company”) and SPST Holdings, LLC (“Holdings” together with smarTours, the “Debtors”), pursuant to section 105(a) of title 11 of the United States Code, Rule 9006(c)(1) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule 9006-1(e) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), for entry of an order scheduling a hearing and shortening the notice period with respect to the Disclosure Statement Motion; and the Court having subject matter jurisdiction to consider the Motion to Shorten and the relief requested therein in accordance with 28 U.S.C. §§ 157(b) and 1334; and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and adequate and appropriate notice of the Motion to Shorten under the circumstances having been provided; and the Court having determined that the

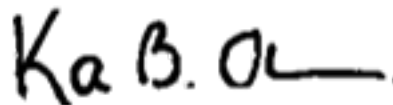
¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: smarTours, LLC (6681); and SPST Holdings, LLC (9027).

² Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Motion to Shorten.

legal and factual bases set forth in the Motion to Shorten establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED THAT:

1. The hearing on the Disclosure Statement Motion shall be held on November 17, 2020 at 1:00 p.m. (ET), with objections, if any, due no later than November 12, 2020 at 4:00 p.m. (ET). The hearing on the Disclosure Statement Motion may be adjourned from time to time without further notice to creditors or parties in interest other than by announcement of the adjournment in open court on the date scheduled for the hearing or on the docket of this case.
2. The Court shall retain jurisdiction with respect to all matters arising from or related to the interpretation or implementation of this Order.

Dated: October 27th, 2020
Wilmington, Delaware


KAREN B. OWENS
UNITED STATES BANKRUPTCY JUDGE