

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

SRC LIQUIDATION COMPANY, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 15-10541 (BLS)

(Jointly Administered)

**NOTICE OF AMENDED<sup>2</sup> AGENDA OF MATTERS SCHEDULED  
FOR HEARING ON OCTOBER 14, 2015 AT 10:30 A.M. (ET)**

**\*\*AT THE DIRECTION OF THE COURT, THE HEARING ORIGINALLY  
SCHEDULED FOR OCTOBER 14, 2015 AT 10:30 A.M. (ET) HAS BEEN  
RESCHEDULED TO OCTOBER 15, 2015 AT 10:00 A.M. (ET)\*\***

**\*\*\*PARTIES WISHING TO APPEAR TELEPHONICALLY AT THE HEARING ON  
OCTOBER 15, 2015 AT 10:00 A.M. (ET) MAY MAKE ARRANGEMENTS WITH  
COURTCALL ANY TIME PRIOR TO THE HEARING BY CALLING (866)-582-6878\*\*\***

**ADJOURNED MATTERS**

1. Debtors' Motion for (I) an Order (A) Establishing Sale Procedures Relating to the Sale of Substantially All of the Debtors' Assets; (B) Approving Bid Protections; (C) Establishing Procedures Relating to the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, Including Notice of Proposed Cure Amounts; (D) Approving Form and Manner of Notice of All Procedures, Protections, Schedules, and Agreements; (E) Scheduling a Hearing to Consider the Proposed Sale; and (F) Granting Certain Related Relief; and (II) an Order (A) Approving the Sale of Substantially All of the Debtors' Assets and (B) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with the Sale [D.I. 23; 3/12/15] (*This matter is scheduled solely with respect to cure/contract objections*)

Related Documents:

<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are as follows: SRC Liquidation Company (5440); SR Liquidation Holding Company (3186); SR Liquidation Technologies, Inc. (3180); SR Liquidation International, Inc. (1861); iMLiquidation, LLC (6337); SR Liquidation of Puerto Rico Inc. (0578); SR Liquidation Mexico Holding Company (1624); Standard Register Holding, S. de R.L. de C.V. (4GR4); Standard Register de México, S. de R.L. de C.V. (4FN0); Standard Register Servicios, S. de R.L. de C.V. (43K5); and SR Liquidation Technologies Canada ULC (0001). The headquarters for the above-captioned Debtors is located at 600 Albany Street, Dayton, Ohio 45417.

<sup>2</sup> **Amended items appear in bold.**

- a) Order (I) Establishing Sale Procedures Relating to the Sale of Substantially All of the Debtors' Assets; (II) Approving the Maximum Reimbursement Amount; (III) Establishing Procedures Relating to the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, Including Notice of Proposed Cure Amounts; (IV) Approving Form and Manner of Notice of All Procedures, Protections, Schedules, and Agreements; (V) Scheduling a Hearing to Consider the Proposed Sale; and (VI) Granting Certain Related Relief [D.I. 286; 4/15/15]
- b) Notice of Sale, Sale Procedures, Auction and Sale Hearing [D.I. 295; 4/16/15]
- c) Notice of (I) Entry into Stalking Horse Agreement and (II) Potential Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with the Sale of Substantially All of the Debtors' Assets [D.I. 307; 4/17/15]
- d) First Amended Notice of (I) Entry into Stalking Horse Agreement and (II) Potential Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with the Sale of Substantially All of the Debtors' Assets [D.I. 356; 4/27/15]
- e) Second Amended Notice of (I) Entry into Stalking Horse Agreement and (II) Potential Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with the Sale of Substantially All of the Debtors' Assets [D.I. 461; 5/8/15]
- f) Corrected Second Amended Notice of (I) Entry into Stalking Horse Agreement and (II) Potential Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with the Sale of Substantially All of the Debtors' Assets [D.I. 497; 5/11/15]
- g) Third Amended Notice of (I) Entry into Stalking Horse Agreement and (II) Potential Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with the Sale of Substantially All of the Debtors' Assets [D.I. 515; 5/14/15]
- h) Supplement to Debtors' Sale Motion [D.I. 559; 5/27/15]
- i) Debtors' Omnibus Reply in Support of the Sale Motion [D.I. 667; 6/15/15]
- j) Notice of Filing of Final List of Executory Contracts and Unexpired Leases That May be Potentially Assumed and Assigned in Connection

with the Sale of Substantially All of the Debtors' Assets [D.I. 681; 6/16/15]

- k) Order (I) Authorizing the Sale of Substantially All of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests; (II) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (III) Granting Certain Related Relief [D.I. 698; 6/19/15]
- l) Notice of Filing of Final Form of Asset Purchase Agreement Entered into By and Between the Debtors and the Back-Up Bidder in Connection with the Sale of Substantially All of the Debtors' Assets [D.I. 699; 6/19/15]
- m) First Supplemental Cure Notice Setting Forth (I) Resolution of Previously-Adjourned Contract Objections and (II) Agreed-Upon Modifications to Cure List Approved by Sale Order [D.I. 819; 7/10/15]
- n) Second Supplemental Cure Notice Setting Forth Resolution of Previously-Adjourned Contract Objections [D.I. 877; 7/28/15]
- o) Third Supplemental Cure Notice Setting Forth Resolution of Previously-Adjourned Contract Objections [D.I. 912; 8/7/15]

Objection Deadline with Respect to the Proposed Cure Amounts: May 8, 2015 at 4:00 p.m. (ET) [Extended for various parties]

Objections/Responses Received with Respect to Proposed Cure Amounts:

- p) Limited Objection by GCCFC 2005-GG5 Terminus Industrial Limited Partnership to Proposed Cure Amount [D.I. 441; 5/8/15]
- q) Objection by CareSource Management Group Co. to Proposed Cure Amount [D.I. 446; 5/8/15]
- r) Objection of Memorial Hermann Health System to Proposed Cure Amount [D.I. 459; 5/8/15]

Status: With respect to the listed responses, these matters are adjourned to the next scheduled omnibus hearing on November 19, 2015. No hearing is necessary.

2. Georgia-Pacific Consumer Products LP's Motion for Relief from the Automatic Stay to Permit Setoff Under Section 553 of the Bankruptcy Code [D.I. 198; 4/6/15]

Related Documents: None.

Objection Deadline: May 5, 2015 at 4:00 p.m. (ET) [Extended for the Debtors and Silver Point Finance, LLC]

Objections/Responses Received: None to date.

Status: This matter has been adjourned to the next scheduled omnibus hearing on November 19, 2015. The Debtors and Georgia Pacific have reached an agreement regarding Georgia Pacific's cure amount. In the event that Georgia-Pacific's contract is rejected in conjunction with the ongoing sale process, all parties' rights are reserved with respect to setoff and the allocation thereof.

### **CONTESTED MATTERS GOING FORWARD**

3. Debtors' First (1st) Omnibus (Substantive) Objection to Claims (Drop-Ship Administrative Priority Claims) Pursuant to Section 502 of the Bankruptcy Code, Bankruptcy Rule 3007 and Local Rule 3007-1 [D.I. 964; 8/21/15]

Related Documents:

- a) Omnibus Reply in Support of Debtors' First (1st) Omnibus (Substantive) Objection to Claims (Drop-Ship Administrative Priority Claims) [D.I. 1138; 10/6/15]

Objection Deadline: September 4, 2015 at 4:00 p.m. (ET) [Extended to September 10, 2015 at 4:00 p.m. (ET) for Harmony Press, Inc.; One TouchPoint East Corp. (f/k/a Berman Printing); and One TouchPoint Mountain States, LLC (f/k/a NSO Press); Extended to September 25, 2015 for Business Card Services, Inc.]

Objections/Responses Received:

- b) Response of Yankee Schooner to Debtors' First (1st) Omnibus (Substantive) Objection to Claims (Drop-Ship Administrative Priority Claims) [D.I. 1010; 9/3/15]
- c) Response of Quick Tech Graphics to Debtors' First (1st) Omnibus (Substantive) Objection to Claims (Drop-Ship Administrative Priority Claims) [D.I. 1011; 9/2/15]
- d) Response to Objection Debtors' First (1st) Omnibus (Substantive) to Claims (Drop-Ship Administrative Priority Claims) by The Envelope Printery [D.I. 1016; 9/4/15]

- e) Response of Wholesale Printing Co. to Debtors' First (1st) Omnibus (Substantive) Objection to Claims (Drop-Ship Administrative Priority Claims) [D.I. 1017; 9/4/15]
- f) Response of Design Type, Inc. to Debtors' First (1st) Omnibus (Substantive) Objection to Claims (Drop-Ship Administrative Priority Claims) [D.I. 1018; 9/4/15]
- g) Limited Objection/Response of Party-in-Interest, TLF Graphics, to Debtors' First (1st) Omnibus (Substantive) Objection to Claims (Drop-Ship Administrative Priority Claims) [D.I. 1019; 9/4/15]
- h) Response of Harmony Press, Inc. in Opposition to Debtors' First (1st) Omnibus (Substantive) Objection to Claims (Drop-Ship Administrative Priority Claims) [D.I. 1030; 9/10/15]
- i) First Amended Response to Objection Debtors' First (1st) Omnibus (Substantive) to Claims (Drop-Ship Administrative Priority Claims) by The Envelope Printery [D.I. 1136; 10/5/15]

Status: This matter is adjourned with respect to Item (h), and the claim filed by Harmony Press, Inc. The claimants that filed responses listed as Items (b), (c), (d), (f) and (g), were not included in the exhibit to the objection, but were served—along with all claimants that have asserted a claim under section 503(b)(9) of the Bankruptcy Code—with the objection and given an opportunity to respond. The Debtors' undersigned counsel has discussed the relief requested with inquiring claimants, and the Debtors have addressed the arguments made by all claimants in their Reply. **This matter is going forward at the hearing rescheduled for October 15, 2015 at 10:00 a.m. (ET).**

4. Debtors' Fourth (4th) Omnibus (Non-Substantive) Objection to Claims Pursuant to Section 502 of the Bankruptcy Code, Bankruptcy Rule 3007 and Local Rule 3007-1 [D.I. 1039; 9/14/15]

Related Documents: None.

Objection Deadline: September 28, 2015 at 4:00 p.m. (ET) [Extended to October 1, 2015 for the Pension Benefit Guaranty Corporation]

Objections/Responses Received:

- a) Response of Jerry L. Yawn to Debtors' Fourth (4th) Omnibus (Non-Substantive) Objection to Claims [D.I. 1102; 9/25/15]

- b) Informal comments from the Pension Benefit Guaranty Corporation
- c) Informal comments from CRA-CAR LLC

Status: The Debtors have discussed the relief requested with Mr. Yawn and understand that Mr. Yawn does not object to such relief. The Debtors have resolved Items (b) and (c) pursuant to agreed-upon language incorporated into a revised form of order, which the Debtors will present at the hearing. **This matter is going forward at the hearing rescheduled for October 15, 2015 at 10:00 a.m. (ET).**

5. Debtors' Fifth (5th) Omnibus (Substantive) Objection to Claims Pursuant to Section 502 of the Bankruptcy Code, Bankruptcy Rule 3007 and Local Rule 3007-1 [D.I. 1040; 9/14/15]

Related Documents: None.

Objection Deadline: September 28, 2015 at 4:00 p.m. (ET)

Objections/Responses Received:

- a) Response of Steven Wilde to Debtors' Fifth (5th) Omnibus (Substantive) Objection to Claims [D.I. 1108; 9/28/15]
- b) Response of Annie Ileleji to Debtors' Fifth (5th) Omnibus (Substantive) Objection to Claims [D.I. 1118; 9/29/15]

Status: The Debtors have discussed the relief requested with Ms. Ileleji, and understand that she does not object to such relief. The Debtors have also discussed the relief requested with Mr. Wilde and clarified the Debtors' intent with respect thereto. **This matter is going forward at the hearing rescheduled for October 15, 2015 at 10:00 a.m. (ET).**

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Dated: October 13, 2015  
Wilmington, Delaware

*/s/ Andrew L. Magaziner*

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