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Propco I Debtors and Debtors in Possession*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

In re:	)	
	)	Chapter 11
TOYS “R” US, INC., <i>et al.</i> , <sup>1</sup>	)	
	)	Case No. 17-34665 (KLP)
Debtors.	)	(Jointly Administered)
	)	
In re:	)	Chapter 11
	)	
TOYS “R” US PROPERTY COMPANY I, LLC, <i>et al.</i> , <sup>2</sup>	)	Case No. 18-31429 (KLP)
	)	
Debtors.	)	(Jointly Administered)
	)	

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are set forth in the *Order (I) Directing Joint Administration of Chapter 11 Cases and (II) Granting Related Relief* [Docket No. 78]. The location of the Debtors’ service address is One Geoffrey Way, Wayne, New Jersey 07470.

<sup>2</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are set forth in the *Debtors’ Motion for Entry of an Order (I) Directing Joint Administration of the Propco I Debtors’ Chapter 11 Cases and (II) Granting Related Relief* [Case No. 18-31429; Docket No. 3]. The location of the Debtors’ service address is One Geoffrey Way, Wayne, NJ 07470.

**AGENDA FOR HEARING ON MOTIONS SCHEDULED  
FOR OCTOBER 24, 2018, AT 1:00 P.M. (PREVAILING EASTERN TIME)**

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**I. TOYS DELAWARE CONTESTED MATTERS [CASE NO. 17-34665]**

1. “Twelfth Omnibus Objection” Debtors’ Twelfth Omnibus Objection to Certain (A) No Liability Claims, (B) Equity Claims, (C) Insufficient Documentation Claims, and (D) Satisfied Claims [Docket No. 4224]

Responses Received:

- A. Response to Debtors’ Twelfth Omnibus Objection to Certain (A) No Liability Claims, (B) Equity Claims, (C) Insufficient Documentation Claims, and (D) Satisfied Claims [Docket No. 4442]
- B. Response to Debtors’ Twelfth Omnibus Objection to Certain (A) No Liability Claims, (B) Equity Claims, (C) Insufficient Documentation Claims, and (D) Satisfied Claims [Docket No. 4507]
- C. Response to Debtors’ Twelfth Omnibus Objection to Certain (A) No Liability Claims, (B) Equity Claims, (C) Insufficient Documentation Claims, and (D) Satisfied Claims [Docket No. 4513]
- D. Response to Debtors’ Twelfth Omnibus Objection to Certain (A) No Liability Claims, (B) Equity Claims, (C) Insufficient Documentation Claims, and (D) Satisfied Claims [Docket No. 4514]
- E. Response to the Omnibus Objection Letter [Docket No. 4516]
- F. Objection to Modification or Disallowance of Claim [Docket No. 4520]
- G. Response to Debtors’ Twelfth Omnibus Objection to Certain (A) No Liability Claims, (B) Equity Claims, (C) Insufficient Documentation Claims, and (D) Satisfied Claims [Docket No. 4521]
- H. Response and Reservation of Rights by Baby Trend, Inc., to Debtors’ First, Third, Fourth, Twelfth, and Sixteenth Omnibus Claim Objections [Docket No. 4562]
- I. Response to Debtors’ Twelfth Omnibus Objection to Certain (A) No Liability Claims, (B) Equity Claims, (C) Insufficient Documentation Claims, and (D) Satisfied Claims [Docket No. 4602]
- J. Response to Debtors’ Twelfth Omnibus Objection to Certain (A) No Liability Claims, (B) Equity Claims, (C) Insufficient Documentation Claims, and (D) Satisfied Claims [Docket No. 4604]
- K. Response to Omnibus Objection [Docket No. 4607]

Related Documents: None

Status: This matter is going forward with respect to National Entertainment Collectibles Association, Inc. With respect to all other claimants for which a response was not timely filed or alternative treatment was not otherwise agreed to, an order was previously entered granting the relief requested.

2. “Sixteenth Omnibus Objection” Debtors' Sixteenth Omnibus Objection to Certain (A) Amended Claims, (B) Exact Duplicate Claims, (C) Incorrect Debtor Claims, (D) Insufficient Documentation Claims, (E) Amended Priority Claims, (F) Reduced Amount Claims, (G) Satisfied Claims, and (H) Substantive Duplicate Claims [Docket No. 4462]

Responses Received:

- A. Response of PlayFusion Limited to the Debtors' Eleventh and Sixteenth Omnibus Claim Objections [Docket No. 4509]
- B. Response and Reservation of Rights by Baby Trend, Inc. to Debtors' First, Third, Fourth, Twelfth, and Sixteenth Omnibus Claim Objections [Docket No. 4562]
- C. Response of Ohio Department of Taxation to Debtors' Sixteenth Omnibus Objection to Certain (A) Amended Claims, (B) Exact Duplicate Claims, (C) Incorrect Debtor Claims, (D) Insufficient Documentation Claims, (E) Amended Priority Claims, (F) Reduced Amount Claims, (G) Satisfied Claims, and (H) Substantive Duplicate Claims [Docket No. 4676]
- D. Claimant Marina Salvan Individually and as Private Attorneys General Act Representative Plaintiff in Salvan vs. Toys “R” Us, 16-CV-04138, US Dist. Ct. for Northern Dist. Of Calif.’s Response to Debtors' Sixteenth Omnibus Objection to Certain (A) Amended Claims, (B) Exact Duplicate Claims, (C) Incorrect Debtor Claims, (D) Insufficient Documentation Claims, (E) Amended Priority Claims, (F) Reduced Amount Claims, (G) Satisfied Claims, and (H) Substantive Duplicate Claims” Debtors' Sixteenth Omnibus Objection to Certain (A) Amended Claims, (B) Exact Duplicate Claims, (C) Incorrect Debtor Claims, (D) Insufficient Documentation Claims, (E) Amended Priority Claims, (F) Reduced Amount Claims, (G) Satisfied Claims, and (H) Substantive Duplicate Claims [Docket No. 4706]
- E. Response to the Debtors' Sixteenth Omnibus Objection to Certain (A) Amended Claims, (B) Exact Duplicate Claims, (C) Incorrect Debtor Claims, (D) Insufficient Documentation Claims, (E) Amended Priority Claims, (F) Reduced Amount Claims, (G) Satisfied Claims, and (H) Substantive Duplicate Claims [Docket No. 4737]
- F. Maya Group HK Ltd.’s Response to Debtors' Sixteenth Omnibus Objection to Certain (A) Amended Claims, (B) Exact Duplicate Claims, (C) Incorrect Debtor Claims, (D) Insufficient Documentation Claims, (E) Amended

Priority Claims, (F) Reduced Amount Claims, (G) Satisfied Claims, and (H) Substantive Duplicate Claims [Docket No. 4740]

- G. Response to Debtors' Sixteenth Omnibus Objection to Certain (A) Amended Claims, (B) Exact Duplicate Claims, (C) Incorrect Debtor Claims, (D) Insufficient Documentation Claims, (E) Amended Priority Claims, (F) Reduced Amount Claims, (G) Satisfied Claims, and (H) Substantive Duplicate Claims [Docket No. 4743]
- H. Response to Debtors' Sixteenth Omnibus Objection to Certain (A) Amended Claims, (B) Exact Duplicate Claims, (C) Incorrect Debtor Claims, (D) Insufficient Documentation Claims, (E) Amended Priority Claims, (F) Reduced Amount Claims, (G) Satisfied Claims, and (H) Substantive Duplicate Claims [Docket No. 4763]
- I. Limited Response of Sundial Brands, LLC to Sixteenth Omnibus Objection to Claims [Docket No. 4784]
- J. Limited Response of Fusion Manufacturing Group, Ltd. to Sixteenth Omnibus Objection to Claims [Docket No. 4785]
- K. Response to Debtors' Sixteenth Omnibus Objection to Certain Claims [Docket No. 4908]
- L. Claimant Jacqueline Shepherd's Response to the Sixteenth Omnibus Objection [Docket No. 4916]
- M. Response to Debtors' Sixteenth Omnibus Objection to Certain Claims [Docket No. 4917]
- N. Response to Debtors' Sixteenth Omnibus Objection to Certain Claims [Docket No. 4918]

Related Documents: None

Status: This matter is resolved with respect to WorkWise, Inc. [Docket No. 4737] and Sundial Brands, LLC [Docket No. 4784].

With respect to Maya Group HK Ltd. [Docket No. 4740], this matter is being adjourned to November 5, 2018.

With respect to PlayFusion Limited [Docket No. 4509], a supplemental claim objection was filed and both matters are being adjourned to November 5, 2018.

With respect to Brightview Enterprise Solutions, LLC f/k/a Brickman Facilities Solutions, LLC [Docket No. 4743] a supplemental claim objection was filed and both matters are being adjourned to November 5, 2018.

With respect to all other claimants for which a response was not timely filed or alternative treatment was not otherwise agreed to, an order was previously entered granting the relief requested.

**II. TOYS DELAWARE UNCONTESTED MATTERS [CASE NO. 17-34665]**

3. “Third Interim Applications for Compensation” Various Applications for Interim Compensation [Docket Nos. 4276, 4344, 4689, 4703, 4844, 4905, 4956, 4957, 4962, 4963, 4964, 4967, 4968, 4969, 4970, 4980, 4981, 4986, 4987, 4988, 4992, 5063, 5084, 5085, 5090, 5091, 5094, 5096, 5107, 5119, 5120, 5265, 5266,]

Responses Received: None

Related Documents:

- A. Amended Exhibit F [Docket No. 5258]
- B. Amended Exhibit F [Docket No. 5259]
- C. Amended Exhibit G [Docket No. 5260]
- D. Amended Exhibit F [Docket No. 5262]
- E. Notice of Filing of Amended Exhibits in Connection with Multiple Interim Applications for Allowance of Administrative Claim for Compensation and Reimbursement of Expenses Filed by Professionals Retained by the Official Committee of Unsecured Creditors [Docket No. 5264]

Status: An order granting the relief requested in part has been or will be submitted to the Court for entry. The remainder of the relief requested will be adjourned to November 15, 2018.

**III. TOYS DELAWARE RESOVLED MATTERS [CASE NO. 17-34665]**

4. “Twenty-Second Omnibus Objection” Debtors' Twenty-Second Omnibus Objection to Certain (A) Substantive Duplicative Claims, (B) No Liability Claims, (C) Satisfied Claims, (D) Incorrect Debtor Claims, (E) Amended Claims, (F) Amended Priority Claims, (G) Reduced Amount and Incorrect Debtor Claims, (H) Reduced Amount Claims, (I) Reclassified Claims, and (J) Insufficient Documentation Claims [Docket No. 4640]

Responses Received:

- A. Response to Debtors' Twenty-Second Omnibus Objection [Docket No. 4927]
- B. Response of IN Retail Fund Woodfield Commons, L.L.C. to Debtors' Twenty-Second Omnibus Objection to Certain (A) Substantive Duplicative Claims, (B) No Liability Claims, (C) Satisfied Claims, (D) Incorrect Debtor Claims, (E) Amended Claims, (F) Amended Priority Claims, (G) Reduced

Amount and Incorrect Debtor Claims, (H) Reduced Amount Claims, (I) Reclassified Claims, and (J) Insufficient Documentation Claims [Docket No. 5139]

Related Documents: None

Status: This matter is resolved with respect to the response filed IN Retail Fund Woodfield Commons, L.L.C. [Docket No. 5139]. With respect to all other claimants for which a response was not timely filed or alternative treatment was not otherwise agreed to, an order was previously entered granting the relief requested.

#### **IV. TOYS DELAWARE ADJOURNED MATTERS**

5. “Toys Delaware Confirmation Hearing” Second Amended Joint Chapter 11 Plan of the Toys Delaware Debtors and Geoffrey Debtors [Docket No. 4542]

Responses Received:

- A. Limited Objection and Reservation of Rights of Winston-Salem Retail Associates, L.P. to the Chapter 11 Plans of the Toys Delaware Debtors and Geoffrey Debtors [Docket No. 4591]
- B. Objection of the United States Trustee to Second Amended Chapter 11 Plans of Toys Delaware Debtors and Geoffrey Debtors [Docket No. 4937]
- C. City of Tacoma’s Notice of Statutory Utility Lien Against Debtor’s Real Property [Docket No. 5112]
- D. Objection of the New Hampshire Department of Revenue Administration to Confirmation of the Debtors’ Proposed Chapter 11 Plan [Docket No. 5134]
- E. Limited Objection and Reservation of Rights of HCL America, Inc. and HCL Technologies Limited to Second Amended Chapter 11 Plans of Toys Delaware Debtors and Geoffrey Debtors [Docket No. 5143]
- F. Opposition to Confirmation of Debtors’ Plan [Docket No. 5145]
- G. Objection of Brightview Enterprise Solutions, LLC f/k/a Brickman Facilities Solutions, LLC to Confirmation of the Second Amended Chapter 11 Plans of the Toys Delaware Debtors and Geoffrey Debtors [Docket No. 5148]
- H. Objection and Memorandum of Points and Authorities of Administrative Claimant PlayFusion Limited to Confirmation of the Chapter 11 Plan Proposed by the Toys Delaware Debtors [Docket No. 5149]

- I. Objection by Commissioner of Massachusetts Department of Revenue to Confirmation of the Second Amended Chapter 11 Plan of the Toys Delaware Debtors and Geoffrey Debtors [Docket No. 5151]
- J. Objection of Toys (Labuan) Holding Limited to Confirmation of Second Amended Chapter 11 Plans of Toys Delaware and Geoffrey Debtors [Docket No. 5152]
- K. Objection of the Ad Hoc Group of Taj Noteholders to Confirmation of the Second Amended Chapter 11 Plans of the Toys Delaware Debtors and Geoffrey Debtors [Docket No. 5153]
- L. Oracle's Objection to Second Amended Chapter 11 Plans of Toys Delaware Debtors and Geoffrey Debtors and Notice of Filing of Plan Supplement for the Toys Delaware and Geoffrey Debtors' Plans [Docket No. 5156]
- M. Objection of the Texas Comptroller of Public Accounts to Confirmation of the Second Amended Chapter 11 Plans of Toys Delaware Debtors and Geoffrey Debtors [Docket No. 5165]
- N. Supplemental Objection of Toys (Labuan) Holding Limited to Confirmation of Third Amended Chapter 11 Plans of Toys Delaware and Geoffrey Debtors [Docket No. 5293]

Related Documents:

- A. Order (I) Approving the Adequacy of the Disclosure Statement, (II) Approving the Solicitation and Notice Procedures With Respect to Confirmation of the Debtors Proposed Chapter 11 Plans, (III) Approving the Forms and Ballots and Notices in Connection Therewith, (IV) Scheduling Certain Dates With Respect Thereto, and (V) Granting Related Relief [Docket No. 4571]
- B. Notice of Filing of Plan Supplement for the Toys Delaware and Geoffrey Debtors' Plan [Docket No. 4850]
- C. Notice of Adjournment of Toys Delaware Debtors and Geoffrey Debtors Confirmation Hearing [Docket No. 5159]
- D. Notice of Filing of Technical Modifications to the Plan and Changes to Deadlines Related Thereto [Docket No. 5202]
- E. Second Notice of Adjournment of Toys Delaware Debtors and Geoffrey Debtors Confirmation Hearing [Docket No. 5327]
- F. Declaration of James Daloia of Prime Clerk LLC Regarding Solicitation of Votes and Tabulation of Ballots Cast on the Notice of Filing of Second Amended Chapter 11 Plans of Toys Delaware Debtors and Geoffrey Debtors [Docket No. 5328]

Status: This matter is being adjourned to the hearing scheduled for November 13, 2018.

6. “First Interim Applications for Compensation” Various Applications for Interim Compensation [Docket Nos. 1859, 1860, 1861, 1862, 1863, 1865, 1866, 1868, 1871, 1873, 1874, 1875, 1883, 1884, 1890, 1894, 1896, 1903, 1916, 1917, 1976, 2329 and 2596]

Responses Received:

- A. Kids II, Inc., Kids II Far East Limited, and Just Play, LLC’s Omnibus Objection to Interim Applications for Compensation and Reimbursement of Expenses [Docket No. 2301]
- B. Joinder of MAM USA and MAM Canada to Kids II, Inc. Kids II Far East Limited, and Just Play LLC's Omnibus Objection to Interim Applications for Compensation and Reimbursement of Expenses [Docket No. 2330]
- C. SquareTrade, Inc. JOINDER in Kids II, Inc., Kids II Far East Limited and Just Play, LLC's Omnibus Objection to Interim Applications for Compensation and Reimbursement of Expenses [Docket No. 2362]
- D. Munchkin, Inc.'s JOINDER in Kids II, Inc., Kids II Far East Limited and Just Play, LLC's Omnibus Objection to Interim Applications for Compensation and Reimbursement of Expenses [Docket No. 2363]
- E. Funrise, Inc. (USA)'s Notice of Joinder in Kids II, Inc., Kids II Far East Limited, and Just Play, LLC's Omnibus Objection to Interim Applications for Compensation and Reimbursement of Expenses [Docket No. 2394]
- F. ShopperTrak RCT Corporation's Joinder in Kids II, Kids II Far East Limited, and Just Play, LLC's Omnibus Objection to Interim Applications for Compensation and Reimbursement of Expenses [Docket No. 2406]
- G. Joinder of the Artsana Companies to Omnibus Objection to Interim Applications for Compensation and Reimbursement of Expenses [Docket No. 2474]
- H. Joinder of The Step2 Holding Company, LLC, The Step2 Company, LLC, Step2 Direct, Step2 Discovery, and Backyard Discovery to Kids II, Inc., Kids II Far East Limited, and Just Play, LLC’s Omnibus Objection to Interim Applications for Compensation and Reimbursement of Expenses [Docket No. 2554]
- I. Joinder by Kent International Inc., USA Helmet Sub Kent Intl, Inc., and Kazam, LLC to Kids II, Inc., Kids II Far East Limited, and Just Play, LLC’s Omnibus Objection to Interim Applications for Compensation and Reimbursement of Expenses [Docket No. 2569]



Related Documents:

- A. Agreed Order Authorizing Payment on an Interim Basis of Certain Professional Fees [Docket No. 2925]

Status: An order granting the relief requested in part was previously entered by the Court. This matter is being adjourned to the omnibus hearing scheduled for November 15, 2018 with respect to the outstanding relief requested.

7. “Second Interim Applications for Compensation” Various Applications for Interim Compensation [Docket Nos. 2810, 3348, 3374, 3375, 3377, 3395, 3401, 3408, 3491, 3354, 3355, 3360, 3361, 3362, 3371, 3367, 3373, 3397, 3399, 3416, 3344, 3418, 3419, 3420, 3427, 3489, 3592, and 3594]

Responses Received: None

Related Documents:

- A. Agreed Order Authorizing Payment on an Interim Basis of Certain Professional Fees [Docket No. 3965]

Status: An order granting the relief requested in part was previously entered by the Court. This matter is being adjourned to the omnibus hearing scheduled for November 15, 2018 with respect to the outstanding relief requested.

8. “Kitex Motion for Relief” Motion of Kitex USA LLC for Relief from the Automatic Stay to Terminate Open Orders and Allow Sale of Toys "R" Us Private Label Merchandise [Docket No. 3026]

Responses Received: None

Related Documents: None

Status: This matter is being adjourned to the omnibus hearing scheduled for November 15, 2018.

9. “Sale Hearing” Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures for the Remaining Toys Delaware Real Estate Assets, (II) Approving the Sale of Certain Real Estate Assets, and (III) Granting Related Relief [Docket No. 2787]

Responses Received: N/A

Related Documents:

- A. Amended Notice of Stalking Horse Bidder for Sale of Winston-Salem JV Interest, the Debtors' Fee Interest in 11 Parcels of Real Estate and the Debtor's Interest in Its Danbury, Connecticut Lease, All as More Fully Described in Exhibit A to the Stalking Horse Agreement and Attached Hereto [Docket No. 3514]

- B. Notice of Sale to Successful and Backup Bidder With Respect to Winston-Salem Lease, Dublin Lease and Midlothian Lease [Docket No. 3635]
- C. Limited Objection and Reservation of Rights of Winston-Salem Retail Associates, L.P. to the Debtors' Motion for Entry of an Order, Inter Alia, Approving the Sale of Certain Real Estate Assets [Docket No. 3821]

Status: An order was previously entered with respect to all matters other than Winston-Salem JV interest which matter was previously continued generally. The sale of the Winston-Salem JV interest is being adjourned to the omnibus hearing scheduled for November 15, 2018.

- 10. "Casiano Motion for Relief" Motion for Relief From Automatic Stay and Associated Notice [Docket No. 4560]

Responses Received: None

Related Documents: None

Status: This matter is being adjourned to the omnibus hearing scheduled for November 15, 2018.

- 11. "Burbank Motion for Late-Filed Claim" Motion to Permit Late Filing of Administrative Claim [Docket No. 5075]

Responses Received: None

Related Documents: None

Status: This matter is being adjourned to the omnibus hearing scheduled for November 15, 2018.

- 12. "Vestar Motion to Compel" Vestar Best in the West Property, LLC's Motion to Determine Rejection of Lease Pursuant to Section 365(d)(4) of the Bankruptcy Code [Docket No. 5002]

Responses Received: None

Related Documents: None

Status: This matter is being adjourned to the omnibus hearing scheduled for November 15, 2018.

- 13. "PlayFusion Objection" Debtors' Supplemental Objection to the PlayFusion Claims [Docket No. 5168]

Responses Received: None

Related Documents: None

Status: This matter is being adjourned to the hearing scheduled for November 5, 2018.

14. “Brightview Motion to Expedite” Motion for Expedited Hearing on Debtors' Objection to BrightView Claim [Docket No. 5235]

Responses Received: None

Related Documents: None

Status: This matter is being adjourned to the hearing scheduled for November 5, 2018.

15. “Brightview Claim Objection” Debtors' Objection to BrightView Claim [Docket No. 5234]

Responses Received: None

Related Documents: None

Status: This matter is being adjourned to the hearing scheduled for November 5, 2018.

**V. PROPCO I UNCONTESTED MATTERS [CASE NO. 18-31429]**

16. “CBRE Retention” Propco I Debtors' Application for Entry of an Order Pursuant to Sections 327(A) and 328 of the Bankruptcy Code, Bankruptcy Rules 2014(A) and 2016 Local Rules 2014-1 and 2016-1 Authorizing the Employment and Retention of CBRE, Inc. as a Real Estate Broker and Advisor Nunc Pro Tunc to August 15, 2018 [Docket No. 537]

Responses Received: None

Related Documents: None

Status: This matter is going forward.

17. “Cushman Retention” Propco I Debtors' Application for Entry of an Order Pursuant to Sections 327(a) and 328 of the Bankruptcy Code, Bankruptcy Rules 2014(a) and 2016 and Local Rules 2014-1 and 2016-1 Authorizing the Employment and Retention of Cushman & Wakefield U.S., Inc., as Real Estate Advisor Nunc Pro Tunc to August 21, 2018 [Docket No. 572]

Responses Received: None

Related Documents: None

Status: This matter is going forward.

18. “First Interim Fee Applications” Various First Interim Fee Applications [Docket Nos. 561, 562, 563, 565, 567, 569, 587 and 591]

Responses Received: None

Related Documents: None

Status: An order granting the relief requested in part has been or will be submitted to the Court for entry. The remainder of the relief requested will be adjourned to November 15, 2018.

19. “Lease Rejection Motion” Propco I Debtors' Omnibus Motion for Entry of an Order Authorizing (I) Rejection of Certain Unexpired Leases of Vacant Real Property Effective Nunc Pro Tunc to October 4, 2018, and (II) Abandonment of any Burdensome Property Located at Locations Covered by Such Unexpired Leases [Docket Nos. 602]

Responses Received: None

Related Documents: None

Status: This matter is going forward.

20. “Lease Rejection Motion” Propco I Debtors' Omnibus Motion for Entry of an Order Authorizing (I) Rejection of Certain Unexpired Leases of Vacant Real Property Effective Nunc Pro Tunc to October 5, 2018, and (II) Abandonment of any Burdensome Property Located at Locations Covered by Such Unexpired Leases [Docket Nos. 616]

Responses Received: None

Related Documents: None

Status: This matter is going forward.

## **VI. PROPCO I CONTESTED MATTERS [CASE NO. 18-31429]**

21. “Sale Hearing” Propco I Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures for the Propco I Leases, (II) Approving the Sale of the Propco I Leases, and (III) Granting Related Relief [Docket No. 455]

Responses Received:

- A. Cure Claim Objection of Cottonwood Corners TIC and Response to Notice of Successful and Backup Bidder [Docket No. 605]
- B. Preliminary Objection of Almaden-Blossom LLC to the Notice of Successful and Backup Bidder With Respect to the Auction of Certain of the Propco I Debtors' Leases [Docket No. 606]
- C. Objection of Kin Properties, Inc. and Related Affiliates to Debtors' Proposed Sale of Certain Real Property and Commercial Leases Pursuant

to 11 U.S.C. §§ 363 and 365 Including Debtors' Proposed Cure Amounts for Lease Numbers 6049, 7006, & 8333, as Set Forth In the Debtors' Sale Notice [Docket No. 579] [Docket No. 607]

- D. Limited Objection of Kimco Realty Corporation to the Debtors' Notice of Successful and Backup Bidder With Respect to Store Number 6559 [Docket No. 608]
- E. Market Plaza Limited Partnership's Objection to the Proposed Assumption and Assignment of Store 7818 Lease to Ollie's Bargain Outlet, Inc. [Docket No. 609]
- F. Limited Objection and Reservation of Rights of GS Centennial LLC to the Notice of Successful and Backup Bidder With Respect to the Auction of Certain of the Propco I Debtors' Leases [Docket No. 610]
- G. Limited Objection and Reservation of Rights of R & J Baileys LLC to the Notice of Successful and Backup Bidder With Respect to the Auction of Certain of the Propco I Debtors' Leases [Docket No. 611]
- H. Limited Objection to Propco I Debtors' Proposed Assumption and Assignment of Store 5662, Proposed Cure Amount, and to the Successful Bidder's Proposed Form of Adequate Assurance of Future Performance with Respect to the Lease [Docket No. 612]
- I. NW Village, LLC's Objection to Debtors' Proposed Assumption and Assignment of Unexpired Lease for Store No. 7833 [Docket No. 613]
- J. Objection of Upper Glen Street Associates, LLC to the Proposed Assignment of Lease to Aldi, Inc. [Docket No. 615]

Related Documents:

- A. Order (I) Establishing Bidding Procedures for the Propco I Leases and (II) Granting Related Relief [Docket No. 519]
- B. Notice of Successful and Backup Bidder With Respect to the Auction of Certain of the Propco I Debtors' Leases [Docket No. 579]
- C. Proposed Order (I) Authorizing the Sale of Certain Propco I Leases Free and Clear of All Interests, (II) Approving the Assumption and Assignment of Leases, (III) Authorizing Entry Into Lease Termination Agreements, and (IV) Granting Related Relief [Docket No. 597]
- D. Order (I) Authorizing The Sale of Certain Propco I Leases Free and Clear of all interest, (II) Approving the Assumption and Assignment of Leases (III) Authorizing Entry into Lease Termination Agreements and (IV) Granting Related Relief [Docket No. 651]

Status: This matter is resolved with respect to Cottonwood Corners TIC [Docket No. 605], Kimco Realty Corporation [Docket No. 608], GS Centennial LLC [Docket No. 610] and R&J Baileys LLC [Docket No. 611] and an order granting the relief requested has been or will be submitted to the Court for entry.

This matter is going forward with respect to the responses filed by Almaden-Blossom LLC [Docket No. 606] and Kin Properties, Inc. [Docket NO. 607]

This matter is being adjourned to November 5, 2018 with respect to the objections filed by Market Plaza Limited Partnership [Docket No. 609], CFT NV Developments, LLC [Docket No. 612], NW Village, LLC [Docket No. 613], Upper Glen Street Associates, LLC [Docket No. 615] and certain informal responses.

## **VII. PROPCO II ADJOURNED MATTERS [CASE NO. 17-34665]**

22. “Propco II Confirmation and Sale Hearing” Propco II Plan Debtors' Motion for Entry of an Order (I) Approving the Adequacy of the Disclosure Statement, (II) Approving the Solicitation and Notice Procedures with Respect to Confirmation of the Propco II Plan Debtors' Proposed Joint Chapter 11 Plan, (III) Shortening the Period to File Plan Objections and the Notice Requirements Related Thereto, (IV) Approving the Forms of Ballots and Notices in Connection Therewith, and (V) Granting Related Relief [Docket No. 3384] and Propco II Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures for the Sale of the Propco II Assets, (II) Scheduling an Auction and Hearing to Consider the Sale, (III) Approving the Form and Manner of Notice Thereof, (IV) Authorizing Certain Expense Reimbursement Provisions, (V) Establishing an Intercompany Administrative Claims Bar Date, (VI) Scheduling Hearings and Deadlines with Respect to the Propco II Debtors' Disclosure Statement and Plan Confirmation, (VII) Shortening the Objections Periods and Notice Requirements Related Thereto, and (VIII) Granting Related Relief [Docket No. 3381]

### Responses Received:

- A. Combined Limited Objection of Irving S. Yasney Trust to (A) Confirmation of Proposed Joint Chapter 11 Plan of Toys "R" Us Property Company II, LLC and Giraffe Junior Holdings, LLC, and (B) Sale of Assets of Toys "R" Us Property Company II, LLC [Docket No. 3964]
- B. Objection of Taylor Square Owner, LLC to Assumption and Assignment of Lease and to Cure Amount [See Doc. Nos. 3649 and 4121] [Docket No. 4248]
- C. Limited Objection of DDR Corp. and GGP Inc. to the Propco II Proposed Cure Amounts and Response to the Tenth Omnibus Claims Objection [Docket No. 4253]
- D. Limited Objection to Confirmation [Docket No. 4269]

- E. Objection of Kin Properties, Inc. and Related Affiliates to Debtors' Proposed Assumption and Assignment of Lease Number 9215 Including Debtors' Proposed Cure Amount as Set Forth in the Debtors' Plan Supplement [Docket No. 4121] [Docket No. 4275]

Related Documents: None

Status: With respect to certain outstanding cure claim objections, this matter is being adjourned to November 15, 2018. An order granting the remainder of the relief requested was previously entered by the Court.

Richmond, Virginia  
Dated: October 22, 2018

*/s/ Jeremy S. Williams*

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