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Co-Counsel to the 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> , ¹ |) | Case No. 17-34665 (KLP) |
| |) | |
| Debtors. |) | (Jointly Administered) |
| |) | |

**AGENDA FOR HEARING ON MOTIONS SCHEDULED
FOR DECEMBER 5, 2017, AT 12:00 P.M. (PREVAILING EASTERN TIME)**

¹ 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 78]. The location of the Debtors’ service address is One Geoffrey Way, Wayne, New Jersey 07470.

I. CONTESTED MATTERS

1. “Debtors’ Executory Contracts and Unexpired Leases Assumption and Rejection Procedures Motion” Debtors’ Motion for Entry of an Order (I) Authorizing and Approving Procedures to Reject or Assume Executory Contracts and Unexpired Leases and (II) Granting Related Relief [Docket No. 955]

Responses Received:

- A. Bayer Retail Company, L.L.C., IMI Huntsville, LLC, and Manana-CDIT, LLC’s Limited Objection to Debtors’ Motion for Entry of an Order (I) Authorizing and Approving Procedures to Reject or Assume Executory Contracts and Unexpired Leases and (II) Granting Related Relief [Docket No. 1075]
- B. Joinder of IKEA Property, Inc., IKEA Center Urban Renewal, Inc., IKEA Development Urban Renewal, LP, and IKEA Retail Management, LP in Limited Objection of Bayer Retail Company, L.L.C., IMI Huntsville, LLC, and Manana-CDIT, LLC to Debtors’ Motion for Entry of an Order (I) Authorizing and Approving Procedures to Reject or Assume Executory Contracts and Unexpired Leases and (II) Granting Related Relief [Docket No. 1083]
- C. Petco’s Limited Objection to Debtors’ Motion for Entry of an Order (I) Authorizing and Approving Procedures to Reject or Assume Executory Contracts and Unexpired Leases and (II) Granting Related Relief [Docket No. 1084]
- D. Reservation of Rights and Limited Objection of Chandler Pavilions, Inc., Shackleford Crossings Investors, LLC, and Gateway Times Square Retail, L.P. to Debtors’ Motion for Entry of an Order (I) Authorizing and Approving Procedures to Reject or Assume Executory Contracts and Unexpired Leases and (II) Granting Related Relief [Docket No. 1089]
- E. Joinder of 6851 Veterans LLC in Limited Objection of Bayer Retail Company, LLC, IMI Huntsville LLC and Manana-CDIT, LLC to Debtors’ Motion for Entry of an Order (I) Authorizing and Approving Procedures to Reject or Assume Executory Contracts and Unexpired Leases and (II) Granting Related Relief [Docket No. 1100]
- F. Joinder of DSF Motel, Inc. in Bayer Retail Company, L.L.C., IMI Huntsville, LLC, and Manana-CDIT, LLC’s Limited Objection to Debtors’ Motion for Entry of an Order (I) Authorizing and Approving Procedures to Reject or Assume Executory Contracts and Unexpired Leases and (II) Granting Related Relief [Docket No. 1105]

- G. Joinder of the Homestead Company, Inc. in Bayer Retail Company, L.L.C., IMI Huntsville, LLC, and Manana-CDIT, LLC's Limited Objection to Debtors' Motion for Entry of an Order (I) Authorizing and Approving Procedures to Reject or Assume Executory Contracts and Unexpired Leases and (II) Granting Related Relief [Docket No. 1109]
- H. Joinder of Cole MT Sunset Valley TX, LLC, Cole TY Coral Springs, FL, LLC, Cole MT San Jose CA, LLC, Cole MT San Antonio (Highway 151) TX, LLC, Cole MT West Covina (Lakes) CA, LP, and Cole MT Beavercreek OH, LLC in Bayer Retail Company, L.L.C., IMI Huntsville, LLC, and Manana-CDIT, LLC's Limited Objection to Debtors' Motion for Entry of an Order (I) Authorizing and Approving Procedures to Reject or Assume Executory Contracts and Unexpired Leases and (II) Granting Related Relief [Docket No. 1110]
- I. Joinder of High Ridge LLC in the Bayer Retail Company, L.L.C., IMI Huntsville, LLC, and Manana-CDIT, LLC's Limited Objection to Debtors' Motion for Entry of an Order (I) Authorizing and Approving Procedures to Reject or Assume Executory Contracts and Unexpired Leases and (II) Granting Related Relief [Docket No. 1112]
- J. Joinder of JDK Townline LLC, Overlook Townline LLC, and TMT Point Plaza, Inc. in the Limited Objection of Bayer Retail Company, L.L.C., IMI Huntsville, LLC, and Manana-CDIT, LLC to Debtors' Motion for Entry of an Order (I) Authorizing and Approving Procedures to Reject or Assume Executory Contracts and Unexpired Leases and (II) Granting Related Relief [Docket No. 1120]
- K. Joinder of Taylor Square Owner LLC in Limited Objection Filed by Bayer Retail Company, L.L.C., IMI Huntsville, LLC, and Manana-CDIT, LLC's Limited Objection to Debtors' Motion for Entry of an Order (I) Authorizing and Approving Procedures to Reject or Assume Executory Contracts and Unexpired Leases and (II) Granting Related Relief [Docket No. 1121]
- L. Joinder of Hart Miracle Marketplace LLC and Hart Pacific Commons LLC in Limited Objection Filed by Bayer Retail Company, LLC, IMI Huntsville, LLC, and Manana-CDIT, LLC to Debtors' Motion for Entry of an Order (I) Authorizing and Approving Procedures to Reject or Assume Executory Contracts and Unexpired Leases and (II) Granting Related Relief [Docket No. 1123]
- M. Joinder of G & L Building Corp. in Limited Objection Filed by Bayer Retail Company, LLC, IMI Huntsville, LLC, and Manana-CDIT, LLC to Debtors' Motion for Entry of an Order (I) Authorizing and Approving Procedures to Reject or Assume Executory Contracts and Unexpired Leases and (II) Granting Related Relief [Docket No. 1124]

Related Documents: None

Status: This matter is going forward.

2. “Debtors’ Senior Executive Incentive Plan Motion” Debtors’ Motion for Entry of an Order (A) Approving the Debtors’ Senior Executive Incentive Plan and (B) Granting Related Relief [Docket No. 957]

Responses Received:

- A. Objection of the United States Trustee to Debtors’ Motion for Entry of an Order (A) Approving the Debtors’ Senior Executive Incentive Plan and (B) Granting Related Relief [Docket No. 1079]

Related Documents:

- A. Exhibit 1 to Declaration of Brian L. Cumberland in Support of Debtors’ Motion for Entry of an Order (A) Approving the Debtors’ Senior Executive Incentive Plan and (B) Granting Related Relief [Docket No. 959]

Status: This matter is going forward.

3. “Debtors’ Non-Insider Compensation Motion” Debtors’ Motion for Entry of an Order (A) Approving the Debtors’ Non-Insider Compensation Program and (B) Granting Related Relief [Docket No. 958]

Responses Received:

- A. Objection of United States Trustee to Debtors’ Motion for Entry of an Order (A) Approving the Debtors’ Non-Insider Compensation Program and (B) Granting Related Relief [Docket No. 1080]

Related Documents: None

Status: This matter is going forward.

II. RETENTION MATTERS

4. “Wolcott Rivers Retention” Application of the Official Committee of Unsecured Creditors Under 11 U.S.C. § 1103, Fed. R. Bankr. P. 2014 and Local Bankruptcy Rule 2014-1, for Order Authorizing Retention and Employment of Wolcott Rivers Gates, P.C. as Local Co-Counsel [Docket No. 867]

Responses Received:

- A. Limited Objection to Application of the Official Committee of Unsecured Creditors Under 11 U.S.C. § 1103, Fed. R. Bankr. P. 2014 and Local Bankruptcy Rule 2014-1, for Order Authorizing Retention and Employment of Wolcott Rivers Gates, P.C. as Local Co-Counsel [Docket No. 929]
- B. Exhibits A Through I Regarding Limited Objection to Application of the Official Committee of Unsecured Creditors Under 11 U.S.C. § 1103, Fed.

R. Bankr. P. 2014 and Local Bankruptcy Rule 2014-1, for Order Authorizing Retention and Employment of Wolcott Rivers Gates, P.C. as Local Co-Counsel [Docket No. 931]

- C. The Official Committee of Unsecured Creditors' (I) Reply in Support of Application for Order Authorizing Retention and Employment of Wolcott Rivers Gates as Its Local Co-Counsel; and (II) Request for Reimbursement of Attorneys' Fees and Costs [Docket No. 968]

Related Documents:

- A. Amended Supplemental Declaration of Cullen D. Speckhart in Support of Application of the Official Committee of Unsecured Creditors Under 11 U.S.C. 1103, Fed. R. Bankr. P. 2014 and Local Bankruptcy Rule 2014-1, For Order Authorizing Retention and Employment of Wolcott Rivers Gates, P.C. as Local Co-Counsel [Docket No. 1116]
- B. Statement Regarding Limited Objection to Application of the Official Committee of Unsecured Creditors Under 11 U.S.C. § 1103, Fed. R. Bankr. P. 2014 and Local Rule 2014-1, for Order Authorizing Retention and Employment of Wolcott Rivers Gates, P.C. as Local Co-Counsel [Docket No. 1117]
- C. Notice of Rescheduled Hearing [Docket No. 1122]

Status: This matter is going forward.

Richmond, Virginia
Dated: December 1, 2017

/s/ Jeremy S. Williams

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