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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)
)	

**AMENDED AGENDA FOR HEARING ON MOTIONS SCHEDULED
FOR FEBRUARY 6, 2018, AT 2:00 P.M. (PREVAILING EASTERN TIME)**

I. CONTESTED MATTERS

1. “Store Closing Sale Motion” Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Enter Into the Consulting Agreements, (II) Authorizing and Approving the Conduct of the Store Closing Sales, With Such Sales to be Free and Clear of all Liens, Claims, and Encumbrances, (III) Authorizing Customary Bonuses to Employees of Closing Stores, and (IV) Granting Related Relief [Docket No. 1595]

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 No. 78]. The location of the Debtors’ service address is One Geoffrey Way, Wayne, New Jersey 07470.

Responses Received:

- A. Limited Objection 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 Beaver creek OH, LLC to Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Enter into the Consulting Agreements, (II) Authorizing and Approving the Conduct of Store Closing Sales, With Such Sales to be Free and Clear of all Liens, Claims, and Encumbrances, (III) Authorizing Customary Bonuses to Employees of Closing Stores, and (IV) Granting Related Relief [Docket No. 1651]
- B. Limited Objection of The Homestead Company, Inc. to Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Enter into the Consulting Agreements, (II) Authorizing and Approving the Conduct of Store Closing Sales, With Such Sales to be Free and Clear of all Liens, Claims, and Encumbrances, (III) Authorizing Customary Bonuses to Employees of Closing Stores, and (IV) Granting Related Relief [Docket No. 1654]
- C. 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 the Debtors to Enter into the Consulting Agreements, (II) Authorizing and Approving the Conduct of the Store Closing Sales, With Such Sales to be Free and Clear of all Liens, Claims, and Encumbrances, (III) Authorizing Customary Bonuses to Employees of Closing Stores, and (IV) Granting Related Relief [Docket No. 1662]
- D. Limited Objection and Reservation of Rights of Trends International, LLC with Respect to Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Enter into the Consulting Agreements, (II) Authorizing and Approving the Conduct of Store Closing Sales, with Such Sales to be Free and Clear of all Liens, Claims, and Encumbrances, (III) Authorizing Customary Bonuses to Employees of Closing Stores, and (IV) Granting Related Relief [Docket No. 1667]
- E. Limited Objection of the United States Trustee to Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Enter into the Consulting Agreements, (II) Authorizing and Approving the Conduct of Store Closing Sales, With Such Sales to be Free and Clear of all Liens, Claims, and Encumbrances,(III) Authorizing Customary Bonuses to Employees of Closing Stores and (IV) Granting Related Relief [Docket No. 1670]

- F. Limited Objection of Weingarten Nostat, Inc. and Weingarten Realty Investors to Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Enter Into the Consulting Agreements, (II) Authorizing and Approving the Conduct of the Store Closing Sales, With Such Sales to be Free and Clear of all Liens, Claims, and Encumbrances, (III) Authorizing Customary Bonuses to Employees of Closing Stores, and (IV) Granting Related Relief [Docket No. 1672]
- G. Limited Objection of Bonnie Management Corp., as Manager for Bricktown Square LLC, to Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Enter Into the Consulting Agreements, (II) Authorizing and Approving the Conduct of the Store Closing Sales, With Such Sales to be Free and Clear of all Liens, Claims, and Encumbrances, (III) Authorizing Customary Bonuses to Employees of Closing Stores, and (IV) Granting Related Relief and Joinder in Certain Landlords' Objections [Docket No. 1675]
- H. Limited Objection of TMT Point Plaza, Inc. to Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Enter Into the Consulting Agreements, (II) Authorizing and Approving the Conduct of the Store Closing Sales, With Such Sales to be Free and Clear of all Liens, Claims, and Encumbrances, (III) Authorizing Customary Bonuses to Employees of Closing Stores, and (IV) Granting Related Relief [Docket No. 1676]
- I. Limited Objection and Reservation of Rights of Mattone Group Raceway LLC, JMM Raceway LLC, and Gart Roosevelt Associates LLC, as Tenants In Common, With Respect to Debtors Motion for Entry of an Order (i) Authorizing the Debtors to Enter Into the Consulting Agreements, (ii) Authorizing and Approving the Conduct of Store Closing Sales, With Such Sales to be Free and Clear of All Liens, Claims, and Encumbrances, (iii) Authorizing Customary Bonuses to Employees of Closing Stores, and (iv) Granting Related Relief [Docket No. 1684]
- J. Limited Objection of Metropolitan Life Insurance Company to Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Enter Into the Consulting Agreements, (II) Authorizing and Approving the Conduct of Store Closing Sales, With Such Sales to be Free and Clear of All Liens, Claims, and Encumbrances, (III) Authorizing Customary Bonuses to Employees of Closing Stores, and (IV) Granting Related Relief [Docket No. 1685]

- K. *Limited Objection of Colliers International Management-Atlanta,LCC, as Receiver of the Assets of IA Lithonia Stonecrest, LLC and as Successor in Interest to the Original Landlord NAP Stonecrest Marketplace, LLC and Fourth Quarter Properties, VII to Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Enter into the Consulting Agreements, (II) Authorizing and Approving the Conduct of Store Closing Sales, With Such Sales to be Free and Clear of All Liens, Claims, and Encumbrances, (III) Authorizing Customary Bonuses to Employees of Closing Stores, and (IV) Granting Related Relief* [Docket No. 1686]

- L. Reservation of Rights of Cantor Fitzgerald Securities, as Administrative Agent, Related to Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Enter Into the Consulting Agreements, (II) Authorizing and Approving the Conduct of Store Closing Sales, with Such Sales to be Free and Clear of All Liens, Claims, and Encumbrances, (III) Authorizing Customary Bonuses to Employees of Closing Stores, and (IV) Granting Related Relief [Docket No. 1693]

Related Documents:

- A. Notice of Filing of Exhibit B to the Consulting Agreements [Docket No. 1621]

- B. Debtors' Omnibus Reply in Support of Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Enter Into the Consulting Agreement, (II) Authorizing and Approving the Conduct of the Store Closing Sales, With Such Sales to Be Free and Clear of All Liens, Claims, and Encumbrances, (III) Authorizing Customary Bonuses to Employees of Closing Stores, and (IV) Granting Related Relief [Docket No. 1687]

- C. Declaration of Mackenzie L. Shea in Support of Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Enter Into the Consulting Agreement, (II) Authorizing and Approving the Conduct of the Store Closing Sales, With Such Sales to Be Free and Clear of All Liens, Claims, and Encumbrances, (III) Authorizing Customary Bonuses to Employees of Closing Stores, and (IV) Granting Related Relief [Docket No. 1694]

- D. Declaration of Mark P. Naughton in Support of Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Enter Into the Consulting Agreement, (II) Authorizing and Approving the Conduct of the Store Closing Sales, With Such Sales to Be Free and Clear of All Liens, Claims, and Encumbrances, (III) Authorizing Customary Bonuses to Employees of Closing Stores, and (IV) Granting Related Relief [Docket No. 1695]

- E. Declaration of Ryan Lawlor in Support of Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Enter Into the Consulting Agreement, (II) Authorizing and Approving the Conduct of the Store Closing Sales, With Such Sales to Be Free and Clear of All Liens, Claims, and Encumbrances, (III) Authorizing Customary Bonuses to Employees of Closing Stores, and (IV) Granting Related Relief [Docket No. 1696]
- F. Supplemental Declaration of Joseph Malfitano in Support of Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Enter Into the Consulting Agreement, (II) Authorizing and Approving the Conduct of the Store Closing Sales, With Such Sales to Be Free and Clear of All Liens, Claims, and Encumbrances, (III) Authorizing Customary Bonuses to Employees of Closing Stores, and (IV) Granting Related Relief [Docket No. 1697]
- G. Declaration of Scott K. Carpenter in Support of Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Enter Into the Consulting Agreement, (II) Authorizing and Approving the Conduct of the Store Closing Sales, With Such Sales to Be Free and Clear of All Liens, Claims, and Encumbrances, (III) Authorizing Customary Bonuses to Employees of Closing Stores, and (IV) Granting Related Relief [Docket No. 1698]
- H. Notice of Filing of Revised Proposed Order (I) Authorizing the Debtors to Enter Into the Consulting Agreement, (II) Authorizing and Approving the Conduct of the Store Closing Sales, With Such Sales to Be Free and Clear of All Liens, Claims, and Encumbrances, (III) Authorizing Customary Bonuses to Employees of Closing Stores, and (IV) Granting Related Relief [Docket No. 1702]

Status: This matter is going forward.

II. UNCONTESTED MATTERS

- 2. “DJM Retention” 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 DJM Realty Services, LLC as a Real Estate Consultant and Advisor *Nunc Pro Tunc* to September 25, 2017 [Docket No. 1447]

Responses Received:

- A. Objection of the United States Trustee to Debtors’ Application for Entry of an Order Pursuant to Sections 327(a) and 328 of the Bankruptcy Code, Bankruptcy Rule 2014(a) and 2016 and Local Rules 2014-1 and 2016-1 Authorizing the Employment and Retention of DJM Realty Services, LLC as a Real Estate Consultant and Advisor *Nunc Pro Tunc* to September 25, 2017 [Docket No. 1524]

Related Documents:

- A. Supplemental Declaration of Mackenzie L. Shea in Support of 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 DJM Realty Services, LLC as a Real Estate Consultant and Advisor Nunc Pro Tunc to September 25, 2017 [Docket No. 1665]

Status: This matter is going forward.

III. CONTINUED MATTERS

3. "Caceres Plaintiffs' Lift Stay Motion" Motion for Relief from Stay Pursuant to 11 U.S.C. § 362(d) to Continue Pending Litigation in the Superior Court of New Jersey [Docket No. 1031]

Responses Received: None

Related Documents: None

Status: This matter is being adjourned to the omnibus hearing date scheduled for March 1, 2018.

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Richmond, Virginia
Dated: February 5, 2018

/s/ Jeremy S. Williams

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