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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**

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

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**AMENDED AGENDA FOR HEARING ON MOTIONS SCHEDULED  
FOR JANUARY 23, 2017, AT 11:00 A.M. (PREVAILING EASTERN TIME)**

<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.

**I. UNCONTESTED MATTERS**

1. “Debtors’ Seal Motion” Debtors’ Motion for Entry of an Order Authorizing the Debtors to File Certain Confidential Information in the Fact Stipulation Under Seal [Docket No. 1500]

Responses Received: None

Related Documents:

- A. Seal Document - Stipulation for Limited Purpose of Hearing on Debtors’ Motions to Authorize Geoffrey LLC to Assume the Intercompany IP License and Subsidy Agreements [Docket No. 1499]

Status: This matter is going forward.

2. “Debtors’ Motion to Expedite Hearing” Debtors’ Motion for (I) Expedited Hearing on Debtors’ Motion for Entry of an Order to File Certain Confidential Information in the Fact Stipulation Under Seal and (II) Granting Related Relief [Docket No. 1501]

Responses Received: None

Related Documents:

- A. Debtors’ Motion for Entry of an Order Authorizing the Debtors to File Certain Confidential Information in the Fact Stipulation Under Seal [Docket No. 1500]

Status: This matter is going forward.

3. “Committee’s Seal Motion” Motion of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Committee to Redact and File Certain Confidential Information Under Seal [Docket No. 1510]

Responses Received: None

Related Documents:

- A. Redacted Document - Objection of Official Committee of Unsecured Creditors to (I) Debtor Toys “R” Us, Inc’s Application to Employ Ducera Partners LLC as Its Financial Advisor, and (II) Debtors TRU Taj LLC and TRU Taj Finance, Inc.’s Application to Employ Center View Partners LLC as Their Financial Advisor [Docket No. 1509]

Status: This matter is going forward.

4. “Committee’s Motion to Expedite” Motion to Expedite Hearing on Motion of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Committee to Redact and File Certain Confidential Information Under Seal [Docket No. 1511]

Responses Received: None

Related Documents:

- A. Motion of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Committee to Redact and File Certain Confidential Information Under Seal [Docket No. 1510]

Status: This matter is going forward.

## **II. CONTESTED MATTERS**

5. “Debtors’ Motion to Assume the Subsidy Agreement” Debtors’ Motion for Entry of an Order (I) Authorizing Geoffrey LLC to Assume the Subsidy Agreement and (II) Granting Related Relief [Docket No. 1262]

Responses Received:

- A. Cyrus Capital Partners, L.P.’s Statement in Response to the Debtors’ IP Motions [Docket No. 1508]
- B. Debtors’ Reply to Cyrus Capital Partners, L.P.’s Statement in Response to the Debtors’ IP Motions [Docket No. 1556]

Related Documents:

- A. Debtors’ Motion for Entry of an Order Authorizing the Debtors to File Certain Confidential Information and Exhibits in the Assumption Motions Under Seal [Docket No. 1264]
- B. Sealed Motion [Docket No. 1265]
- C. Revised Proposed Order (I) Authorizing Geoffrey LLC to Assume the Subsidy Agreement and (II) Granting Related Relief [Docket No. 1542]
- D. Seal Exhibit [Docket No. 1543]
- E. Stipulation for Limited Purpose of Hearing on Debtors’ Motions to Authorize Geoffrey LLC to Assume the Intercompany IP License and Subsidy Agreements [Docket No. 1545]
- F. Revised Proposed Order (I) Authorizing Geoffrey LLC to Assume the Subsidy Agreement and (II) Granting Related Relief [Docket No. 1570]
- G. Sealed Exhibit [Docket No. 1571]

Status: This matter is going forward.

6. “Debtors’ Motion to Assume the Intercompany IP License Agreements” Debtors’ Motion for Entry of an Order (I) Authorizing Geoffrey LLC to Assume the Intercompany IP License Agreements, and (II) Granting Related Relief [Docket No. 1263]

Responses Received:

- A. Cyrus Capital Partners, L.P.’s Statement in Response to the Debtors’ IP Motions [Docket No. 1508]
- B. Debtors’ Reply to Cyrus Capital Partners, L.P.’s Statement in Response to the Debtors’ IP Motions [Docket No. 1556]

Related Documents:

- A. Debtors’ Motion for Entry of an Order Authorizing the Debtors to File Certain Confidential Information and Exhibits in the Assumption Motions Under Seal [Docket No. 1264]
- B. Sealed Motion [Docket No. 1266]
- C. Revised Proposed Order (I) Authorizing Geoffrey LLC to Assume the Intercompany IP License Agreements, and (II) Granting Related Relief [Docket No. 1540]
- D. Sealed Exhibit [Docket No. 1541]
- E. Stipulation for Limited Purpose of Hearing on Debtors’ Motions to Authorize Geoffrey LLC to Assume the Intercompany IP License and Subsidy Agreements [Docket No. 1545]
- F. Revised Proposed Order (I) Authorizing Geoffrey LLC to Assume the Intercompany IP License Agreements, and (II) Granting Related Relief [Docket No. 1568]
- G. Sealed Exhibit [Docket No. 1569]

Status: This matter is going forward.

7. “Debtors’ Seal Motion” Debtors’ Motion for Entry of an Order Authorizing the Debtors to File Certain Confidential Information and Exhibits in the Assumption Motions Under Seal [Docket No. 1264]

Responses Received: None

Related Documents:

- A. Debtors’ Motion for Entry of an Order (I) Authorizing Geoffrey LLC to Assume the Subsidy Agreement and (II) Granting Related Relief [Docket No. 1262]
- B. Debtors’ Motion for Entry of an Order (I) Authorizing Geoffrey LLC to Assume the Intercompany IP License Agreements, and (II) Granting Related Relief [Docket No. 1263]

Status: This matter is going forward

8. “Debtors’ Motion to Provide Consideration to Landlords in Exchange for Extending the 365(d)(4) Deadline” Debtors’ Motion for Entry of an Order (I) Authorizing the Debtors to Provide Consideration to Landlords in Exchange for Extending the 365(d)(4) Deadline, (II) Approving the Extension Letter, and (III) Granting Related Relief [Docket No. 1450]

Responses Received:

- A. Objection of the United States Trustee to Debtors’ Motion for Entry of an Order (I) Authorizing the Debtors to Provide Consideration to Landlords in Exchange for Extending the 365(D)(4) Deadline, (II) Approving the Extension Letter, and (III) Granting Related Relief [Docket No. 1531]
- B. Reply of Official Committee of Unsecured Creditors in Support of Debtors’ Motion for Entry of an Order (I) Authorizing the Debtors to Provide Consideration to Landlords in Exchange for Extending the Section 365(d)(4) Deadline, (II) Approving the Extension Letter, and (III) Granting Related Relief [Docket No. 1555]
- C. Debtors’ Reply to the Objection of the United States Trustee to the Debtors’ Motion for Entry of an Order (I) Authorizing the Debtors to Provide Consideration to Landlords in Exchange for Extending the 365(d)(4) Deadline, (II) Approving the Extension Letter, and (III) Granting Related Relief [Docket No. 1563]

Status: This matter is going forward

### III. RETENTION MATTERS

9. “Ducera Retention” Application of Debtor Toys “R” Us, Inc. for Entry of an Order (A) Authorizing the Retention and Employment of Ducera Partners LLC as Financial Advisor to Debtor Toys “R” Us, Inc., Effective *Nunc Pro Tunc* to November 1, 2017, (B) Modifying Certain Timekeeping Requirements, and (C) Granting Related Relief [Docket No. 1410]

#### Responses Received:

- A. Ad Hoc Group of B-4 Lenders’ Limited Objection to Debtor Toys “R” Us, Inc.’s Application for Entry of an Order Authorizing the Retention and Employment of Ducera Partners LLC as Financial Advisor and Debtors TRU Taj LLC and TRU Taj Finance, Inc.’s Application for Entry of an Order Authorizing the Retention and Employment of Centerview Partners LLC as Financial Advisor [Docket No. 1498]
- B. Objection of Official Committee of Unsecured Creditors to (I) Debtor Toys “R” Us, Inc.’s Application to Employ Ducera Partners LLC as its Financial Advisor, and (II) Debtors TRU Taj LLC and TRU Taj Finance, Inc.’s Application to Employ Centerview Partners LLC as their Financial Advisor [Docket No. 1509]
- C. Omnibus Response to Objections to Debtor Toys “R” Us, Inc.’s Application for Entry of an Order Authorizing the Retention and Employment of Ducera Partners LLC as Financial Advisor [Docket No. 1549]

#### Related Documents:

- A. Notice of Filing of Revised Proposed Order Authorizing Debtor Toys “R” Us, Inc. to Employ and Retain Ducera Partners LLC as Financial Advisor Effective *Nunc Pro Tunc* to November 1, 2017 [Docket No. 1548].

Status: This matter is going forward.

10. “Centerview Retention” Application of Debtors TRU Taj LLC and TRU Taj Finance, Inc., for Entry of an Order Authorizing the Retention and Employment of Centerview Partners LLC as Financial Advisor for Debtors and Debtors in Possession TRU Taj LLC and TRU Taj Finance, Inc. Effective *Nunc Pro Tunc* to November 1, 2017 [Docket No. 1413]

#### Responses Received:

- A. Ad Hoc Group of B-4 Lenders’ Limited Objection to Debtor Toys “R” Us, Inc.’s Application for Entry of an Order Authorizing the Retention and Employment of Ducera Partners LLC as Financial Advisor and Debtors TRU Taj LLC and TRU Taj Finance, Inc.’s Application for Entry of an Order Authorizing the Retention and Employment of Centerview Partners LLC as Financial Advisor [Docket No. 1498]

- B. Objection of Official Committee of Unsecured Creditors to (I) Debtor Toys “R” Us, Inc.’s Application to Employ Ducera Partners LLC as its Financial Advisor, and (II) Debtors TRU Taj LLC and TRU Taj Finance, Inc.’s Application to Employ Centerview Partners LLC as their Financial Advisor [Docket No. 1509]
- C. Objection of the United States Trustee to Application of Debtors TRU Taj LLC and TRU Taj Finance, Inc. for Entry of an Order Authorizing the Retention and Employment of Centerview Partners LLC as Financial Advisor for Debtors and Debtors in Possession TRU Taj, LLC and TRU Taj Finance, Inc. Effective *Nunc Pro Tunc* to November 1, 2017 [Docket No. 1523]
- D. Debtors TRU Taj LLC and TRU Taj Finance, Inc.’s Omnibus Reply in Support of Application of Debtors TRU Taj LLC and TRU Taj Finance, Inc. for Entry of an Order Authorizing the Retention and Employment of Centerview Partners LLC as Financial Advisor for Debtors and Debtors in Possession TRU Taj LLC and TRU Taj Finance, Inc. Effective *Nunc Pro Tunc* to November 1, 2017 [Docket No. 1552]
- E. Supplemental Declaration of Samuel M. Greene in Support of Application of Debtors TRU Taj LLC and TRU Taj Finance, Inc. For Entry of an Order Authorizing the Retention and Employment of Centerview Partners LLC as Financial Advisor for Debtors and Debtors in Possession TRU Taj LLC and TRU Taj Finance, Inc. Effective *Nunc Pro Tunc* to November 1, 2017 [Docket No. 1553]

Related Documents:

- A. Notice of Filing of Revised Proposed Order Authorizing the Retention and Employment of Centerview Partners LLC as Financial Advisor for Debtors and Debtors in Possession TRU Taj LLC and TRU Taj Finance, Inc. Effective *Nunc Pro Tunc* to November 1, 2017 [Docket No. 1554]

Status: This matter is going forward.

- 11. “Zolfo Cooper Retention” Application of Debtor Toys “R” Us – Delaware, Inc. for Entry of an Order (A) Authorizing the Employment and Retention of Zolfo Cooper, LLC as Financial Advisor to Toys “R” Us – Delaware, Inc. *Nunc Pro Tunc* to December 26, 2017 and (B) Granting Related Relief [Docket No. 1444]

Responses Received: None

Related Documents:

- A. Notice of Filing of Revised Proposed Order (A) Authorizing the Employment and Retention of Zolfo Cooper, LLC as Financial Advisor to Toys “R” Us – Delaware, Inc. *Nunc Pro Tunc* to December 26, 2017 and (B) Granting Related Relief [Docket No. 1558]

Status: This matter is going forward.

12. “Malfitano Retention” Debtors’ Application for Entry of an Order, Pursuant to Sections 327(a) and 328(a) of the Bankruptcy Code, (I) Authorizing Employment and Retention of Malfitano Advisors, LLC as the Debtors’ Asset Disposition Advisor and Consultant, *Nunc Pro Tunc* to December 11, 2017 and (II) Granting Related Relief [Docket No. 1412]

Responses Received: None

Related Documents:

- A. Notice of Filing of Revised Proposed Order, Pursuant to Sections 327(a) and 328(a) of the Bankruptcy Code, (I) Authorizing Employment and Retention of Malfitano Advisors, LLC as the Debtors’ Asset Disposition Advisor and Consultant, *Nunc Pro Tunc* to December 11, 2017 and (II) Granting Related Relief [Docket No. 1564]

Status: This matter is going forward.

13. “PwC Retention” Debtors’ Application for Entry of an Order Authorizing the Employment and Retention of PricewaterhouseCoopers LLP as Tax and Accounting Advisory Consultants to the Debtors *Nunc Pro Tunc* to October 26, 2017 [Docket No. 1446]

Responses Received: None

Related Documents:

- A. Supplemental Declaration of Scott Gehsmann in Support of Debtors’ Application for Entry of an Order Authorizing the Employment and Retention of PricewaterhouseCoopers LLP as Tax and Accounting Advisory Consultants to the Debtors [Docket No. 1559]
- B. Notice of Filing of Revised Proposed Order Authorizing the Employment and Retention of PricewaterhouseCoopers LLP as Tax and Accounting Advisory Consultants to the Debtors *Nunc Pro Tunc* to October 26, 2017 [Docket No. 1565]

Status: This matter is going forward.



14. “Keen Retention” Debtors’ Application for Entry of an Order Authorizing the Retention and Employment of Keen Summit Capital Partners LLC as Real Estate Advisor *Nunc Pro Tunc* to December 5, 2017 [Docket No. 1407]

Responses Received: None

Related Documents:

- A. Notice of Filing of Revised Proposed Order Authorizing the Employment and Retention of Keen Summit Capital Partners LLC as Real Estate Advisor *Nunc Pro Tunc* to December 5, 2017 [Docket No. 1566]

Status: This matter is going forward.

15. “Berwin Leighton Retention” Application of the Official Committee of Unsecured Creditors, Pursuant to Sections 328 and 1103 of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 2014 for an Order Approving the Retention and Employment of Berwin Leighton Paisner LLP as Special Foreign Counsel to the Committee *Nunc Pro Tunc* to December 4, 2017 [Docket No. 1408]

Responses Received: None

Related Documents: None

Status: This matter is going forward.

16. “Bennett Jones Retention” Application of the Official Committee of Unsecured Creditors, Pursuant to Sections 328 and 1103 of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 2014 for an Order Approving the Retention and Employment of Bennett Jones LLP as Canadian Counsel to the Committee *Nunc Pro Tunc* to January 3, 2018 [Docket No. 1452]

Responses Received: None

Related Documents:

- A. Notice of Filing of Revised Order Approving the Retention and Employment of Bennet Jones LLP as Canadian Counsel to the Committee *Nunc Pro Tunc* to January 3, 2018 [Docket No. 1557]

Status: This matter is going forward.

#### IV. CONTINUED MATTERS

17. “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 adjourned to the February 6, 2018 hearing.

18. “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: None

Status: This matter is adjourned to the February 6, 2018 hearing.

Richmond, Virginia  
Dated: January 23, 2018

*/s/ Jeremy S. Williams*

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