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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 MARCH 20, 2018, AT 12:00 P.M. (PREVAILING EASTERN TIME)**

I. UNCONTESTED MATTERS

1. “Application to Employ Frontline” Application of Giraffe Holdings, LLC, Giraffe Junior Holdings, LLC and Toys “R” Us Property Company II, LLC for Entry of an Order Authorizing Their Retention and employment of Frontline Real Estate Partners, LLC as Real Estate Advisor in Connection with Conflict Matters Effective *Nunc Pro Tunc* to February 1, 2019 [Docket No. 1850]

Responses Received: None

Related Documents:

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.

- A. Notice of Filing of Revised Proposed Order Authorizing the Retention and Employment of Frontline Real Estate Partners, LLC as Real Estate Advisor *Nunc Pro Tunc* to February 1, 2018 [Docket No. 2016]

Status: This matter is going forward.

2. “Motion to Expedite” Motion to Expedite Hearing on Debtors' Omnibus Motion for Entry of Orders: (I) Authorizing the Debtors to Wind-Down U.S. Operations, (II) Authorizing the Debtors to Conduct U.S. Store Closings, (III) Establishing Bidding Procedures for the Sale of the Debtors' Canadian Equity, (IV) Enforcing an Administrative Stay, and (V) Granting Related Relief [Docket No. 2051]

Responses Received: None

Related Documents: None

Status: This matter is going forward.

II. CONTESTED MATTERS

3. “Motion to Approve Bidding Procedures” Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures, (II) Approving the Sale of Certain Real Property and Leases, and (III) Granting Related Relief [Docket No. 1880]

Responses Received:

- A. Bayer Retail Company, L.L.C. and IMI Huntsville, LLC's Objection to Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures, (II) Approving the Sale of Certain Real Property and Leases, and (III) Granting Related Relief [Docket No. 1994]
- B. Objection of IKEA Center Urban Renewal, L.P., IKEA Development Urban Renewal, LP; and IKEA Retail Management, LP to Debtors' Motion for Entry of Order (I) Establishing Bidding Procedures, (II) Approving the Sale of Certain Real Property and Leases, and (III) Granting Related Relief [Docket No. 1995]
- C. Joinder of Kimco Realty Corporation to Objections to Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures, (II) Approving the Sale of Certain Real Property and Leases and (III) Granting Related Relief [Docket No. 1998]
- D. Joinder of Landlords, Running Hill, SP LLC, Palm Beach Outlets I LLC, and NED Altoona LLC in Objections by Certain Landlords to Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures, (II) Approving the Sale of Certain Real Property and Leases, and (III) Granting Related Relief [Docket No. 2000]
- E. Joinder of The Chesterfield Development, L.L.C. in Objection of Bayer Retail Company, L.L.C. and IMI Huntsville, LLC to Debtors' Motion for

Entry of an Order (I) Establishing Bidding Procedures, (II) Approving the Sale of Certain Real Property and Leases, and (III) Granting Related Relief [Docket No. 2001]

- F. Joinder of Taylor Square Owner, LLC in Objection to Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures; (II) Approving the Sale of Certain Real Property and Leases; and (III) Granting Related Relief [Docket No. 2002]
- G. 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 Objections to Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures, (II) Approving the Sale of Certain Real Property and Leases, and (III) Granting Related Relief [Docket No. 2003]
- H. Joinder of Route 146 Millbury LLC and Bellingham II LLC to Bayer Retail Company, L.L.C. and I.M.I. Huntsville, LLC's Objection to Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures, (II) Approving the Sale of Certain Real Property and Leases, and (III) Granting Related Relief [Docket No. 2007]
- I. Joinder of Washington Prime Group Inc. to Objections of Certain Landlords to Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures, (II) Approving the Sale of Certain Real Property and Leases, and (III) Granting Related Relief [Docket No. 2012]
- J. Joinder of NPMC Retail, LLC to Objections to Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures, (II) Approving the Sale of Certain Real Property and Leases, and (III) Granting Related Relief [Docket No. 2014]
- K. Limited Objection of Acadia Realty Limited Partnership, Aronov Realty Management, Brixmor Property Group, Inc., Centennial Real Estate Co, Crosspoint Realty Services, Federal Realty Investment Trust, Retail Properties of America, and The Macerich Company to Debtors Motion for Entry of An Order (I) Establishing Bidding Procedures, (II) Approving the Sale of Certain Real Property and Leases, and (III) Granting Related Relief [Docket No. 2017]
- L. Joinder of DSF Motel, Inc. in Objection to Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures, (II) Approving the Sale of Certain Real Property and Leases, and (III) Granting Related Relief [Docket No. 2018]
- M. Objection to DDR Corp., GGP Limited Partnership, Shopcore Properties, LP, Philips International, National Retail Properties, National Realty & Development Corp., Rouse Properties, LLC, Basser-Kaufman, Inc.,

Regency Centers Corp., Aston Properties, DLC Management Corp., Benderson Development Company, LLC, and Hines Global Reit, Inc. to Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures, (II) Approving the Sale of Certain Real Property and Leases, and (III) Granting Related Relief [Docket No. 2019]

- N. Joinder of High Ridge LLC in Objection to Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures, (II) Approving the Sale of Certain Real Property and Leases, and (III) Granting Related Relief [Docket No. 2020]
- O. Limited Objection of Clinton Investors, LLC to Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures; (II) Approving the Sale of Certain Real Property and Leases, and (III) Granting Related Relief [Docket No. 2022]
- P. Joinder, Limited Objection to, and Reservation of Rights Regarding Debtors Motion for Entry of an Order (I) Establishing Bidding Procedures, (II) Approving the Sale of Certain Real Property and Leases, and (III) Granting Related Relief [Docket No. 2023]
- Q. Objection by Pappas Union City, L.P. and Weingarten Realty Investors to Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures, (II) Approving the Sale of Certain Real Property and Leases, and (III) Granting Related Relief [Docket No. 2025]
- R. De Rito Talking Stick South, LLC's Reservation of Rights With Respect to Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures, (II) Approving the Sale of Certain Real Property and Leases, and (III) Granting Related Relief [Docket No. 2026]
- S. Joinder of Landlords Chandler Pavilions, Inc., Shackelford Crossings Investors, LLC, and Gateway Times Square Retail, L.P., in Objections Filed by Certain Landlords to Debtors' Motion for (I) Establishing Bidding Procedures, (II) Approving Sale of Certain Real Property and Leases, and (III) Granting Related Relief [Docket No. 2027]
- T. Joinder of TMT Pointe Plaza, Inc., JDK Townline LLC, and Overlook Townline LLC in Objections to Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures, (II) Approving the Sale of Certain Real Property and Leases, and (III) Granting Related Relief [Docket No. 2028]
- U. Joinder of Smith Interest General Partnership LLP in Objection of Bayer Retail Company, L.L.C. and IMI Huntsville, LLC to Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures, (II) Approving the Sale of Certain Real Property and Leases, and (III) Granting Related Relief [Docket No. 2029]
- V. Joinder of Fourth Quarter Properties, VII and Metropolitan Life Insurance Company in Objection to Debtors' Motion for Entry of an Order (I)

Establishing Bidding Procedures, (II) Approving the Sale of Certain Real Property and Leases, and (III) Granting Related Relief [Docket No. 2031]

- W. Limited Objection, Joinder and Reservation of Rights of Ramco-Gershenson Properties and Levin Management Corporation to Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures, (II) Approving the Sale of Certain Real Property and Leases, and (III) Granting Related Relief [Docket Nos. 2032 and 2033]
- X. Joinder in Objections to Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures, (II) Approving the Sale of Certain Real Property and Leases, and (III) Granting Related Relief [Docket No. 2047]

Related Documents:

- A. Supplement to the Debtors' Motion for Entry of an Order (I) Establishing Bidding Procedures, (II) Approving the Sale of Certain Real Property and Leases, and (III) Granting Related Relief [Docket No. 2053]

Status: This matter is going forward

- 4. "Debtors' Wind-Down Motion" Debtors' Omnibus Motion for Entry of Orders: (I) Authorizing the Debtors to Wind-Down U.S. Operations, (II) Authorizing the Debtors to Conduct U.S. Store Closings, (III) Establishing Bidding Procedures for the Sale of the Debtors' Canadian Equity, (IV) Enforcing an Administrative Stay, and (V) Granting Related Relief [Docket No. 2050]

Responses Received:

- A. Limited Objection and Reservation of Rights of Readerlink Distribution Services, LLC with Respect to Debtors' Omnibus Motion for Entry of Orders: (I) Authorizing the Debtors to Wind-Down U.S. Operations, (II) Authorizing the Debtors to Conduct U.S. Store Closings, (III) Establishing Bidding Procedures for the Sale of the Debtors' Canadian Equity, (IV) Enforcing an Administrative Stay, and (V) Granting Related Relief [Docket No. 2107]
- B. Joint Opposition of Munchkin, Inc. and SquareTrade, Inc. to Debtors' Omnibus Motion for Entry of Orders: (I) Authorizing the Debtors to Wind-Down U.S. Operations, (II) Authorizing the Debtors to Conduct U.S. Store Closings, (III) Establishing Bidding Procedures for the Sale of the Debtors' Canadian Equity, (IV) Enforcing an Administrative Stay, and (V) Granting Related Relief [Docket No. 2108]

Related Documents: None

Status: This matter is going forward.

III. CONTINUED MATTERS

5. “Capital Brands Application” *Application of Capital Brands, LLC for Allowance and Payment of Administrative Expense Claim Pursuant to 11 U.S.C. § 503(b)(9)* [Docket No. 1726]

Responses Received: None

Related Documents: None

Status: This matter is being adjourned to the omnibus hearing date scheduled for April 19, 2018.

6. “Lanard Motion for Relief from Stay” Renewed Motion for Relief from Stay Pursuant to 11 U.S.C. § 362(d) to Continue Pending Litigation [Docket No. 1897]

Responses Received: None

Related Documents: None

Status: This matter is being adjourned to the omnibus hearing date scheduled for April 19, 2018.

7. “SOS Motion to Compel” Motion to Compel Assumption or Rejection of Security Guard Service Agreement [Docket No. 1944]

Responses Received: None

Related Documents: None

Status: This matter is being adjourned to the omnibus hearing date scheduled for April 19, 2018.

8. “Motion to Enforce” Motion and Memorandum of Law in Support Thereof by RiverRoad Waste Solutions, Inc. to (A) Enforce Terms of Settlement, or Alternatively, (B) Authorize Retroactive Termination of the Master Services Agreement [Docket No. 1857]

Responses Received:

- A. Debtors’ Objection to Motion and Memorandum of Law in Support Thereof by RiverRoad Waste Solutions, Inc. to (A) Enforce Terms of Settlement, or Alternatively, (B) Authorize Retroactive Termination of the Master Services Agreement [Docket No. 2036]

Related Documents: None

Status: This matter is being adjourned to the omnibus hearing date scheduled for April 19, 2018.

Richmond, Virginia
Dated: March 16, 2018

/s/ Jeremy S. Williams

KUTAK ROCK LLP

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