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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 MAY 10, 2018, AT 2:00 P.M. (PREVAILING EASTERN TIME)**

I. CONTESTED MATTERS

1. “Bid Procedures Motion” 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]

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. Bayer Development Company, LLC, IMI Huntsville, LLC, and Manana-CDIT, LLC's Objection to 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. 2941]
- B. Joinder of The Homestead Company, Inc. in the Objection of Bayer Development Company, LLC, IMI Huntsville, LLC, and Manana-CDIT, LLC to 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. 2945]
- C. Joinder of Landlords, Running Hill SP LLC, Palm Beach Outlets I, LLC and NED Altoona LLC in Objection by Certain Landlords to 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. 2949]
- D. Joinder of DSF Motel, Inc. in the Objection of Bayer Development Company, LLC, IMI Huntsville, LLC, and Manana-CDIT, LLC to 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. 2951]
- E. Joinder of High Ridge LLC in the Objection of Bayer Development Company, LLC, IMI Huntsville, LLC, and Manana-CDIT, LLC to 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. 2952]
- F. Joinder of Taylor Square Owner LLC in the Objection of Bayer Development Company, LLC, IMI Huntsville, LLC, and Manana-CDIT, LLC to 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. 2953]
- G. Vestar Best In the West Property, LLC's Objection and Reservation of Rights to 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. 2970]

- H. Limited Objection and Joinder of Gateway-DC Properties, Inc. and OCW Retail-Dedham to Bayer Development Company, LLC, IMI Huntsville, LLC, and Manana-CDIT, LLC's Objection to 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. 2871]
- I. Joinder of Metropolitan Life Insurance Company in Objection of Bayer Development Company, LLC, IMI Huntsville, LLC, and Manana-CDIT, LLC to 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. 2973]
- J. Limited Objection and Joinder of 9358 North Central Expressway (Dallas) LLC to Bayer Development Company, LLC's, IMI Huntsville, LLC's, and Manana-CDIT, LLC's Objection to 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. 2976]
- K. Objection, Joinder and Reservation of Rights of Landlords, Ramco-Gershenson Properties Trust and Levin Management Corporation to 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. 2989] (Withdrawn at Docket No. 3021)
- L. Reservation of Rights of Winston-Salem (Hanes), LLC, KRG Evans Mullins, LLC, KRG Belle Isle, LLC, KRG South Elgin Commons LLC, KRG Cedar Hill Plaza LP, and KRG White Plains City Center, LLC to 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. 2991]

Related Documents: None

Status: This matter is going forward.

2. “Ground Lease Motion” Debtors' Motion for Entry of an Order (I) Approving the Assumption and Assignment of Certain Ground Leases, (II) Approving the Private Sale Free and Clear and of Liens, Claims, Encumbrances, and Interests, (III) Approving the Lease Termination Agreement, and (IV) Granting Related Relief [Docket No. 2570]

Responses Received:

- A. Objection to Assumption and Assignment of Lease [Docket No. 2586]
- B. Preliminary Objection of Fairfield Gateway, LP to the Debtors' Motion for Entry of an Order (I) Approving the Assumption and Assignment of Certain Ground Leases, (II) Approving the Private Sale Free and Clear and of Liens, Claims, Encumbrances, and Interests, (III) Approving the Lease Termination Agreement, and (IV) Granting Related Relief [Docket No. 2676]

Related Documents:

- A. Supplement to Debtors' Motion for Entry of an Order (I) Approving the Assumption and Assignment of Certain Ground Leases, (II) Approving the Private Sale Free and Clear and of Liens, Claims, Encumbrances, and Interests, (III) Approving the Lease Termination Agreement, and (IV) Granting Related Relief [Docket No. 2815]
- B. Order (I) Approving the Assumption and Assignment of Certain Ground Leases, (II) Approving the Private Sale Free and Clear and of Liens, Claims, Encumbrances, and Interests, (III) Approving the Lease Termination Agreement, and (IV) Granting Related Relief [Docket No. 2921]

Status: A consent order was previously entered with respect to the relief requested at Docket No. 2570. With respect to the additional relief requested at Docket No. 2815, this matter is going forward.

- 3. “Sale Hearing” 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]²

Responses Received:

- A. Objection to Assumption and Assignment of Lease for Woodbridge, Virginia Babies “R” Us Store [Docket No. 2586]
- B. Limited Objection of Route 146 Millbury LLC to Assumption and Assignment of Lease [Docket No. 2588]
- B. Objection of Clearwater Crossing LP to Assumption and Assignment of Lease of Nonresidential Real Property [Docket No. 2591]

² Substantially all prior objections 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. 1880] were previously resolved or overruled. With respect to items (E), (G), (I) and (K) and any unresolved objections, the matter is going forward.

- C. Objection to (A) Adequate Assurance of Future Performance, and (B) Proposed Cure Amount by Terracommercial Management Corporation to Proposed Assumption and Assignment of Non-Residential Real Property Lease to Scandinavian Designs [Docket No. 2592]
- D. Objection of Centennial Real Estate Company, LLC to Notice of Assumption and Assignment of Certain Unexpired Leases [Docket No. 2593]
- E. Objection of Landlord, NTH 250E LLC, to Proposed Assignment and Assumption of Lease of Store No. 6306, Paramus, NJ to Raymour & Flanigan [Docket No. 2594]
- F. Limited Objection to Debtors' (I) Notice of Successful and Backup Bidder with Respect to the Auction of the Debtors' Real Estate Assets and (II) Notice of Assumption of Certain Unexpired Leases [Docket No. 2595]
- G. Brea Union Plaza I, LLC's Objection to (1) the Debtors' Proposed Assumption and Assignment of Unexpired Lease Relating to Store No. 5672 and (2) the Debtors Proposed Form of Adequate Assurance of Future Performance of Such Lease by the Designated Successful and Backup Bidders [Docket No. 2598]
- H. Limited Objection of DDR Nassau Pavilion Associates, LP to the Notice of Assumption and Assignment of Certain Unexpired Leases [Docket No. 2604]
- I. Reply of Raymours Furniture Company, Inc. to the Objections of Landlord, Nth 250 E LLC to Proposed Assignment and Assumption of Lease of Store No. 6306, Paramus to Raymour & Flanigan [Docket No. 2646]
- J. Objection of CPT Creekside Town Center, LLC to Debtors Notice of Assumption and Assignment of Certain Unexpired Leases [Docket No. 2666]
- K. Brea Union Plaza I, LLC's Supplemental Objection to (1) the Debtors' Proposed Assumption and Assignment of Unexpired Lease Relating to Store No. 5672 and (2) the Debtors Proposed Form of Adequate Assurance of Future Performance of Such Lease by the Designated Successful and Backup Bidders [Docket No. 2818]

Related Documents:

- A. Order (I) Establishing Bidding Procedures and (II) Granting Related Relief [Docket No. 2351]
- B. Auction and Hearing Notice and Notice of Qualified Bids [Docket No. 2442]

- C. Notice of Successful and Backup Bidder With Respect to the Auction of Certain of the Debtors' Real Estate Assets [Docket No. 2494]
- D. Notice of Assumption and Assignment of Certain Unexpired Leases [Docket No. 2513]
- E. Declaration of Emilio Amendola in Support of Entry of an Order (I) Authorizing the Sale of Certain Real Estate Assets 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. 2681]
- F. Proposed Order (I) Authorizing the Sale of Certain Real Estate Assets 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. 2685]
- G. Stipulation and Agreed Order By and Between the Debtors and Pappas Union City No 2, LP [Docket No. 2778]
- H. Stipulation for Limited Purpose of Hearing Regarding Undisputed Facts and Issues and Admitted Evidence in Connection with Contested Matter Relating to (1) the Debtors' Proposed Assumption and Assignment of Unexpired Lease Relating to Store No. 5672 and (2) the Debtors' Proposed Form of Adequate Assurance of Future Performance of Such Lease by the Designated Backup Bidder [Docket No. 3013]
- I. Debtors' Reply in Support of 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. 3022]
- J. Supplemental Declaration of Emilio Amendola in Support of Debtors' Reply in Support of 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. 3023]

Status: An order was previously entered granting the relief requested in part [Docket No. 2715]. With respect to certain unresolved objections, this matter is going forward.

II. ADJOURNED MATTERS

- 4. "Protective Order" Debtors Emergency Motion for Entry of an Order Deeming Information Shared with Vendor Objectors as Governed by the Protective Order and Notice of Expedited Hearing [Docket No. 2636]

Responses Received: None

Related Documents:

- A. Joinder of Lego Systems, Inc. to the Debtors Emergency Motion for Entry of an Order Deeming Information Shared with Vendor Objectors as Governed by the Protective Order [Docket No. 3012]

Status: This matter is being adjourned to the hearing scheduled for May 15, 2018 at 10:00 a.m.

5. “Huffy Relief from Stay” Motion of Huffy Corporation for Relief From the Automatic Stay to Allow the Sale of Toys “R” Us Private Label Merchandise [Docket No. 2930]

Responses Received: None

Related Documents: None

Status: This matter is being adjourned to the omnibus hearing scheduled for May 24, 2018 at 10:00 a.m.

6. “Huffy Motion to Expedite” Motion of Huffy Corporation for Expedited Hearing on Motion for Relief From the Automatic Stay to Allow the Sale of Toys “R” Us Private Label Merchandise [Docket No. 2932]

Responses Received: None

Related Documents: None

Status: This matter is being adjourned to the omnibus hearing scheduled for May 24, 2018 at 10:00 a.m.

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Richmond, Virginia
Dated: May 9, 2018

/s/ Jeremy S. Williams

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