

Edward O. Sassower, P.C.  
Joshua A. Sussberg, P.C. (admitted *pro hac vice*)  
**KIRKLAND & ELLIS LLP**  
**KIRKLAND & ELLIS INTERNATIONAL LLP**  
601 Lexington Avenue  
New York, New York 10022  
Telephone: (212) 446-4800  
Facsimile: (212) 446-4900

James H.M. Sprayregen, P.C.  
Anup Sathy, P.C.  
Chad J. Husnick, P.C. (admitted *pro hac vice*)  
Emily E. Geier (admitted *pro hac vice*)  
**KIRKLAND & ELLIS LLP**  
**KIRKLAND & ELLIS INTERNATIONAL LLP**  
300 North LaSalle  
Chicago, Illinois 60654  
Telephone: (312) 862-2000  
Facsimile: (312) 862-2200

-and-

Michael A. Condyles (VA 27807)  
Peter J. Barrett (VA 46179)  
Jeremy S. Williams (VA 77469)  
**KUTAK ROCK LLP**  
901 East Byrd Street, Suite 1000  
Richmond, Virginia 23219-4071  
Telephone: (804) 644-1700  
Facsimile: (804) 783-6192

*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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**AGENDA FOR HEARING ON MOTIONS SCHEDULED  
FOR AUGUST 16, 2018, AT 10:00 A.M. (PREVAILING EASTERN TIME)**

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**I. CONTESTED MATTERS**

1. "Sale Hearing" 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]

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<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.

Responses Received:

- A. Objection of Brixmor Hall Road LLC to (A) 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 and (B) Notice of Successful and Backup Bidders with Respect to the Auction of Certain of the Toys Delaware's Real Estate Assets [Docket No. 3467]
- B. Statement and Reservation of Rights of Washington Prime Group Inc. to the Proposed Assumption and Assignment and the Proposed Cure Amount for the Lease Associated with White Oaks Plaza, LLC (Store No. 6003) [Docket No. 3469]
- C. Objection of Washington Prime Group Inc. to the Proposed Assumption and Assignment and the Proposed Cure Amount for the Lease Associated with The Plaza at Buckland Hills (Store No. 7532) [Docket No. 3471]
- D. Limited Objection of DDR Corp., Phillips International Holding Corp., and Regency Centers L.P. to the Notice of Successful and Backup Bidder with Respect to the Auction of Certain of the Toys Delaware's Real Estate Assets [Docket No. 3476]
- E. Objection of BT Hull Street, LLC to (A) Debtors' Proposed Assumption and Assignment of Unexpired Lease Relating to Store No. 6570 and (B) Debtors' Proposed Form of Adequate Assurance of Future Performance by Successful and Backup Bidders [Docket No. 3482]
- F. Objection of Hart Pacific Commons LLC to Proposed Sale, Assumption and Assignment of Lease, and Adequate Assurance of Future Performance [Docket No. 3486]
- G. Objection of 6711 Glen Burnie Retail, LLC to the Debtors' Proposed Assumption and Assignment of Unexpired Lease Relating to Store No. 8350. [Docket No. 3450]
- H. CBL & Associates Management, Inc.'s Objection to (1) Debtors' Proposed Assumption and Assignment of Unexpired Lease Relating to Store No. 6033 and (2) the Debtors' Propose Form of Adequate Assurance of Future Performance of Such Lease by the Designated Successful Bidder [Docket No. 3475]
- I. Constellation Solar New Jersey II, LLC's (1) Preliminary Limited 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 and (2) Cross-Motion for (A) A Determination that Bankruptcy Code Section 365(h) Will Apply to a Sale Free and Clear of Leasehold Interests;

(B) In the Alternative Adequate Protection Under Section 363(e); and (C) If Applicable, Adequate Assurance Under Section 365(f)(2) [Docket No. 3784]

- J. Saadia Group LLC's Objection to Debtors Intended of Sale of the Mt. Olive and Rialto Properties to Backup Bidder [Docket No. 4046]

Related Documents:

- A. Order (I) Establishing Bidding Procedures for the Remaining Real Estate Assets of Toys Delaware and (II) Granting Related Relief [Docket No. 3056]
- B. Non-Auction Sale Notice With Respect to Jersey City [Docket No. 3108]
- C. Amended Notice of Bid Deadline and Potential Sale Hearing [Docket No. 3279]
- D. Notice of Qualified Bidders [Docket No. 3331]
- E. Notice of Successful and Backup Bidders With Respect to the Auction of Certain of the Toys Delaware's Real Estate Assets [Docket No. 3410]
- F. Notice of Filing of 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. 3464]
- G. Amended Notice of Stalking Horse Bidder for Sale of Winston-Salem JV Interest, the Debtors' Fee Interest in 11 Parcels of Real Estate and the Debtor's Interest in Its Danbury, Connecticut Lease, All as More Fully Described in Exhibit A to the Stalking Horse Agreement and Attached Hereto [Docket No. 3514]
- H. Notice of Filing of Revised 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. 3526]
- I. 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 the Entry Into Lease Termination Agreements, and (IV) Granting Related Relief [Docket No. 3529]

- J. Order (I) Authorizing the Sale of Certain Real Estate Assets (II) Approving the Assumption and Assignment of Leases, (III) Authorizing Entry into Lease Termination Agreements, and (IV) Granting Related Relief [Docket No. 3611]
- K. Reply in Support of 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 Property and Leases, and (III) Granting Related Relief [Docket No. 3633]
- L. Notice of Sale to Successful and Backup Bidder With Respect to Winston-Salem Lease, Dublin Lease and Midlothian Lease [Docket No. 3635]
- M. Order (I) Granting the Motion with Respect to the Glen Burnie Store (II) Overruling the Objection to the Sale of the Glen Burnie Lease and (III) Granting Related Relief [Docket No. 3715]
- N. Notice of Qualified Bidder [Docket No. 3729]
- O. Notice of Successful and Backup Bidder with Respect to the Auction of Certain of the Debtors' Real Estate Assets [Docket No. 3761]
- P. Sealed Exhibit [Docket No. 3786]
- Q. Revised Exhibit C [Docket No. 3787]
- R. Revised Seal Exhibit [Docket No. 3788]
- S. Notice of Qualified Bidder [Docket No. 3813]
- T. Limited Objection and Reservation of Rights of Winston-Salem Retail Associates, L.P. to the Debtors' Motion for Entry of an Order, Inter Alia, Approving the Sale of Certain Real Estate Assets [Docket No. 3821]
- U. Amended Notice of Successful and Backup Bidder with Respect to the Auction of Certain of the Debtors' Real Estate Assets [Docket No. 3824]
- V. Notice of Successful and Backup Bidder With Respect to the Auction of Certain of the Debtors' Wave 3 Real Estate Assets [Docket No. 3835]
- W. Supplemental Order (I) Authorizing the Sale of Certain Real Estate Assets Free and Clear of all Interests (II) Approving the Assumption and Assignment of Leases and (III) Granting Related Relief [Docket No. 3846]
- X. Supplemental Order (I) Authorizing the Sale of Certain Real Estate Assets Free and Clear of all Interests (II) Approving the Assumption and Assignment of Leases and (III) Granting Related Relief [Docket No. 3847]

- Y. Order (I) Authorizing the Sale of Certain Real Estate Assets Free and Clear of All Interests, (II) Approving the Assumption and Assignment of Leases, and (III) Granting Related Relief [Docket No. 3931]
- Z. Proposed Order (I) Authorizing the Sale of Certain Real Estate Assets Free and Clear of All Interests and (II) Granting Related Relief [Docket No. 3932]
- AA. Declaration of Emilio Amendola in Support of Entry of Orders Approving the Sale of Certain Real Estate Assets Free and Clear of All Interests [Docket No. 3933]
- BB. Order Approving the Sale of Certain Real Estate Assets and Granting Related Relief [Docket No. 3945]
- CC. Order Approving the Sale of Certain Real Estate Assets and Granting Related Relief [Docket No. 3946]
- DD. Supplemental Order Approving the Lease Termination Agreement and Granting Related Relief [Docket No. 3972]
- EE. Notice of Backup Bidder with Respect to the Auction of Certain of the Debtors' Wave 3 Real Estate Assets [Docket No. 3996]

Status: An order was previously entered with respect to the sale of a majority of the subject real estate. This matter is going forward with respect to certain real estate sales for Mt. Olive, New Jersey and Rialto, California. This matter is being adjourned to September 13, 2018 with respect to the sale of the Winston-Salem JV interest.

2. “Motion to Seal” Motion of Constellation Solar New Jersey II, LLC's to File Under Seal Exhibits A and B In Support of Its (1) Preliminary Limited 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 and (2) Cross-Motion for (A) A Determination that Bankruptcy Code Section 365(h) Will Apply to a Sale Free and Clear of Leasehold Interests; (B) In the Alternative Adequate Protection Under Section 363(e); and (C) If Applicable, Adequate Assurance Under Section 365(f)(2) [Docket No. 3785]

Responses Received: None

Related Documents: None

Status: This matter is going forward.

Richmond, Virginia  
Dated: August 14, 2018

*/s/ Jeremy S. Williams*

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**KUTAK ROCK LLP**

Michael A. Condyles (VA 27807)  
Peter J. Barrett (VA 46179)  
Jeremy S. Williams (VA 77469)  
901 East Byrd Street, Suite 1000  
Richmond, Virginia 23219-4071  
Telephone: (804) 644-1700  
Facsimile: (804) 783-6192  
Email: Michael.Condyles@KutakRock.com  
Peter.Barrett@KutakRock.com  
Jeremy.Williams@KutakRock.com

*Co-Counsel to the Debtors  
and Debtors in Possession*

**KIRKLAND & ELLIS LLP**

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Edward O. Sassower, P.C.  
Joshua A. Sussberg, P.C. (admitted *pro hac vice*)  
601 Lexington Avenue  
New York, New York 10022  
Telephone: (212) 446-4800  
Facsimile: (212) 446-4900  
Email: edward.sassower@kirkland.com  
joshua.sussberg@kirkland.com

-and-

James H.M. Sprayregen, P.C.  
Anup Sathy, P.C.  
Chad J. Husnick, P.C. (admitted *pro hac vice*)  
Emily E. Geier (admitted *pro hac vice*)  
300 North LaSalle  
Chicago, Illinois 60654  
Telephone: (312) 862-2000  
Facsimile: (312) 862-2200  
Email: james.sprayregen@kirkland.com  
anup.sathy@kirkland.com  
chad.husnick@kirkland.com  
emily.geier@kirkland.com

*Co-Counsel to the Debtors  
and Debtors in Possession*