

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:) Chapter 11
)
Morgan Administration, Inc., *et al.* d/b/a) Case No. 18-30039
Home Owners Bargain Outlet,¹) (Jointly Administered)
)
Debtors and Debtors in Possession) Hon. Jacqueline P. Cox

**NOTICE OF CONFIRMATION AND EFFECTIVE DATE OF JOINT PLAN OF LIQUIDATION OF
MORGAN ADMINISTRATION, INC., *et al.* & ESTABLISHMENT OF BAR DATES**

By order of the court, to all parties in interest, please take notice that:

1. Plan Confirmation

On September 13, 2019, Morgan Administration, Inc., and its related debtors-in-possession in the above-captioned chapter 11 proceedings (the “*Debtors*”) jointly with the Official Committee of Unsecured Creditors obtained an order confirming the *First Amended Joint Chapter 11 Liquidating Plan* (Dkt. 258) (the “*Plan*”) from the United States Bankruptcy Court for the Northern District of Illinois (the “*Bankruptcy Court*”). A copy of the order confirming the Plan (the “*Confirmation Order*”) is attached to this notice as **Exhibit A**. Pursuant to the Plan and Confirmation Order, Sandor Jacobson has been named as the Creditor Trustee (the “*Trustee*”).

2. Effective Date of the Plan

With all conditions to the Effective Date set forth in Section VI.A of the Plan having been satisfied and no stay of the Confirmation Order is in effect, the Effective Date of the Plan is deemed to be October 15, 2019 (the “*Effective Date*”).

3. Administrative Claims Bar Date

A claim asserting a right to payment under § 503(b) of the Bankruptcy Code for administrative expense claims not paid as of the Effective Date of the Plan must be filed by **November 14, 2019**. Any claims asserted as entitled to payment under § 503(b) of the Bankruptcy Code for which a request for payment is not timely filed by November 14, 2019 will be automatically disallowed, barred from assertion, and will not be enforceable

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: Morgan Administration, Inc. (4200); Belvidere Associates LLC (8559); FP Retail Associates LLC (0915); Hillcrest Enterprises, LLC (4581); Jular Media LLC (0805); KLS Acquisition Corp. (0925); Loomis Enterprises LLC (5451); North Avenue Associates LLC (3229); Oak Creek Distribution LLC (0634); OL Enterprises LLC (9401); and Deforab LLC (9348).

against the Debtors or the Debtors' bankruptcy estates or property. This provision does not apply to retained case professionals (see section 6 below).

4. Rejection Damages Claims Bar Date

Any party who wishes to file a proof of claim based on the rejection of an executory contract or unexpired lease as a consequence of Plan confirmation (each a "***Confirmation Rejection Claim***") must be filed by **November 14, 2019**. Any Confirmation Rejection Claim for which a proof of claim is not timely filed by November 14, 2019 will be automatically disallowed, barred from assertion, and will not be enforceable against the Debtors or the Debtors' bankruptcy estates or property.

All allowed claims arising from the rejection of an executory contract or unexpired lease shall be classified as Class 5 General Unsecured Claims.

Note: the bar date for claims for rejection damages arising from orders entered prior to confirmation are governed by such prior orders of the Court.

5. Procedure for Filing Proofs of Rejection Damage Claims & § 503(b) Payment Requests

A party wishing to file a claim for rejection damages should obtain a copy of the claim form, and instructions on filing the claim, at the following link:

<http://www.bmcgroup.com/HOBOContractRej>.

All claims for rejection damages must be delivered **no later than the November 14, 2019 deadline** (a) by email to hobo@bmcgroup.com; or (b) by mail to BMC Group, Inc., Attn: HOB0 Claims Processing, PO Box 90100, Los Angeles, CA 90009.

A party wishing to file a request for payment under § 503(b) of the Bankruptcy Code for administrative expense claims not paid as of the Effective Date of the Plan (other than a request of any retained case professionals) **must file such request with the Bankruptcy Court no later than November 14, 2019.**

6. Deadline for Case Professionals to Apply for Allowance of Fees & Reimbursement of Expenses

An application of a retained case professional for allowance of fees and reimbursement of expenses incurred in these chapter 11 cases must be filed no later than 45 days after the Effective Date of the Plan.

7. Effect of Bar Dates on Claims

On the Effective Date of the Plan, any claim of any sort filed or asserted after the relevant bar date or deadline for filing such claim will be deemed disallowed in full, and with prejudice, except to the extent that treatment of such claim is subject to a prior order of the

Bankruptcy Court or is the subject of a contested proceeding that remains unresolved on the Effective Date. Prior bar dates established in these chapter 11 cases and rights and obligations established by such bar dates are incorporated into and otherwise unaffected by the Plan.

8. Inquiries

If you have any questions regarding this Notice, you should contact the Trustee at creditor.trustee@plantemorán.com (reference “HOBO Plan Inquiry” in the subject line) or by calling 312-928-5387.

9. Inconsistencies

To the extent that there is any inconsistency between this Notice and the Plan or the Confirmation Order, the provisions of the Plan or the Confirmation Order, as applicable, govern.

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
Eastern Division

In Re:)	BK No.: 18-30039
Morgan Administration, Inc., et al. d/b/a)	(Jointly Administered)
Home Owners Bargain Outlet,)	Chapter: 11
)	Honorable Jacqueline Cox
)	
Debtor(s))	

Order Confirming First Amended Joint Chapter 11 Liquidating Plan

Morgan Administration, Inc., and its affiliated debtors and debtors in possession, d/b/a Home Owners Bargain Outlet (the "Debtors") in the above-captioned chapter 11 cases (the "Cases"), jointly with the Official Committee of Unsecured Creditors of Morgan Administration, Inc., et al. (the "Committee," referred to with the Debtors collectively as the "Plan Proponents"), having jointly proposed and filed the First Amended Joint Chapter 11 Liquidating Plan (the "Plan") (Dkt. 258), dated August 8, 2019, a copy of which is attached to this Order as Exhibit 1; the Plan Proponents having proposed and filed a Creditor Trust Agreement, attached as an exhibit to the Plan, a copy of which is attached to this Order as Exhibit 2; and the Committee having filed a Notice of Selection of Creditor Trustee on the docket in the Cases (Dkt. 262); the Court having considered the Plan and Creditor Trust Agreement; argument and evidence presented in support of confirmation of the Plan and approval of the Creditor Trust Agreement; there being no objections to confirmation of the Plan; and the Court having found that the Plan satisfies the elements of confirmation under 11 U.S.C. § 1129; and otherwise being fully apprised of the premises:

It is hereby Ordered:

1. The Plan, attached to this Order as Exhibit 1, is confirmed.
2. The Creditor Trust Agreement, attached to this Order as Exhibit 2, is approved.
3. Sandor Jacobson's selection as the initial Creditor Trustee under the terms of the Creditor Trust Agreement is hereby approved upon the Effective Date of the Plan.
4. Notwithstanding the provisions of Bankruptcy Rule 3020(e), this Order is effective immediately upon its entry.
5. As provided under Section VI(F) of the Plan, the Creditor Trustee shall file a notice of the occurrence of the Effective Date of the Plan as soon as practicable after the occurrence of the Effective Date.
6. The Creditor Trustee is directed to cause a copy of this Order (excluding Exhibits 1 and 2), along with a copy of the Confirmation Notice, in substantially the same form that was previously approved by order of this Court on August 6, 2019 (Dkt. 257), to be served on all known creditors and parties in interest under the Bankruptcy Code and Rules, within 5 business days of the Effective Date of the Plan. The Plan Proponents or Creditor Trustee shall provide a copy of the Plan or Creditor Trust

Form G5 (20170105_bko)

Agreement to any party in interest upon request at no charge.

7. The Creditor Trustee is further directed to cause the Confirmation Notice to be published in the Chicago Tribune and Milwaukee Journal Sentinel as soon as practicable following the occurrence of the Effective Date.

Enter:

J. Cox *Jacqueline P. Cox*

Honorable Jacqueline Cox

United States Bankruptcy Judge

Dated: **SEP 12 2019**

Prepared by:

Jonathan Friedland (IL No. 6257902)
Mark Melickian (IL No. 6229843)
Elizabeth B. Vandesteeg (IL No. 6291426)
Jack O'Connor (IL No. 6302674)
Sugar Felsenthal Grais & Helsing LLP
30 N. LaSalle St., Ste. 3000
Chicago, Illinois 60602
Telephone: 312.704.9400
Facsimile: 312.372.7951
jfriedland@SFGH.com
mmelickian@SFGH.com
evandesteeg@SFGH.com
joconnor@SFGH.com

Counsel to the Debtors