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**IN THE UNITED STATES BANKRUPTCY COURT  
 FOR THE DISTRICT OF NEVADA**

In re:  Jagged Peak, Inc., a Nevada corporation,  <input checked="" type="checkbox"/> Affects this Debtor.	Case No.: BK-S-19-15959-MKN Chapter 11  <b>LEAD CASE</b>  <b>Jointly Administered with:</b>  Case No.: BK-S-19-15960-MKN Chapter 11
In re:  TradeGlobal, LLC, a Delaware limited liability company,  <input checked="" type="checkbox"/> Affects this Debtor.	Case No.: BK-S-19-15961-MKN Chapter 11  Hearing Date: February 19, 2020 Hearing Time: 10:30 a.m.
In re:  TradeGlobal North America Holding, Inc., a Delaware corporation,  <input checked="" type="checkbox"/> Affects this Debtor.	Case No.: BK-S-19-15961-MKN Chapter 11  Hearing Date: February 19, 2020 Hearing Time: 10:30 a.m.

**DECLARATION OF JEREMY ROSENTHAL IN SUPPORT OF DEBTORS’  
 MOTION FOR ORDER EXTENDING THE EXCLUSIVE PERIODS TO FILE  
 AND SECURE ACCEPTANCE OF DEBTORS’ PLAN OF REORGANIZATION  
PURSUANT TO 11 U.S.C. § 1121(d)**

I, Jeremy Rosenthal, declare, under penalty of perjury, as follows:

1. I am the Chief Restructuring Officer (“CRO”) of debtors-in-possession Jagged

1 Peak, Inc. (“Jagged Peak”), TradeGlobal, LLC (“TradeGlobal”), and TradeGlobal North America  
2 Holding, Inc., (“TGNA” and, collectively with Jagged Peak and TradeGlobal “Debtors”). In my  
3 capacity as CRO, I am responsible for overseeing the Debtors’ operations during the pendency of  
4 these Chapter 11 Cases, and to generally manage the Debtors’ efforts to maximize the value of the  
5 estates.

6 2. I began working with the Debtors on or about August 29, 2019 and have developed  
7 extensive knowledge of the Debtors’ operations and finances. Except as otherwise indicated, all  
8 facts set forth in this Declaration are based upon my personal knowledge of the Debtors’ operations  
9 and finances, information learned from my review of relevant documents, and information  
10 supplied to me by other members of the Debtors’ management and the Debtors’ various business  
11 and legal advisors.

12 3. I make this Declaration in support of the *Debtors’ Motion for Order Extending the*  
13 *Exclusive Periods to File and Secure Acceptance of Debtors’ Plan of Reorganization Pursuant to*  
14 *11 U.S.C. § 1121(d)* (the “Motion”).<sup>1</sup> If called upon to testify as to the content of this Declaration,  
15 I could and would do so.

16 4. While the Debtors’ Chapter 11 Cases are not extraordinarily large, they are complex  
17 because, among other things, the Debtors’ estates included two separate but interrelated operating  
18 businesses with a number of shared suppliers and intercompany agreements, and complicated  
19 dynamics between the Debtors and their ultimate equity holder, Singapore Post Limited.

20 5. In the Motion, Debtors request an order extending the 120-day period for filing a  
21 plan of reorganization, which is currently set for January 14, 2020, up to and including May 14,  
22 2020, and the 180-day period for securing acceptance of the plan to the fourteenth business day  
23 after the plan confirmation hearing is concluded.

24 6. This is Debtors’ first request to extend the exclusive periods to file and secure  
25 acceptance of a plan of reorganization pursuant to 11 U.S.C. § 1121(d).

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<sup>1</sup> All capitalized, undefined terms shall have the meanings ascribed to them in the Motion.

1           7.       The Debtors were in the business of supporting clients' e-commerce operations by  
2 harnessing technology and had nearly 800 dedicated and hard-working rank-and-file employees to  
3 process, fulfill and ship consumer and medical goods across the United States.

4           8.       Jagged Peak was a logistic company with multi-national clients serviced by its  
5 proprietary software product, EDGE™ (Enterprise Dynamic Global Engine), which enabled  
6 companies to control and coordinate multi-channel orders, catalogs, multi-warehouse inventories,  
7 and delivery across multiple customers, suppliers, employees, locations, and partners. The  
8 EDGE™ platform was a critical competitive advantage for Jagged Peak.

9           9.       In addition to the EDGE™ platform, Jagged Peak managed warehouses where it  
10 stored, packed and shipped over \$900 million in goods for clients every year. Jagged Peak  
11 managed all facets of a customer's e-commerce operations from order processing, selecting items,  
12 packing boxes and shipping orders for final delivery by third-party shipping companies (like UPS,  
13 one of the Debtors' largest creditors and trusted vendors).

14           10.      TradeGlobal also provided a sophisticated software as a service (SaS) platform  
15 called Cross-Border. Cross-Border enabled TradeGlobal's customers to sell and ship products  
16 from the United States into international markets by managing shipping costs, tariffs and duties,  
17 and supporting the customer in complying with foreign laws and regulations.

18           11.      TradeGlobal and Jagged Peak worked closely with one another in conducting their  
19 business operations. TradeGlobal and Jagged Peak shared certain relationships with key suppliers  
20 and Jagged Peak contracts with TradeGlobal for it to pack and ship goods in the Midwest region  
21 of the United States for Jagged Peak's largest customer. TradeGlobal utilized Jagged Peak's  
22 sophisticated EDGE™ software platform to fulfill orders for Jagged Peak efficiently and cost  
23 effectively.

24           12.      The hearing to consider the Jagged Peak and TradeGlobal Sales was held on  
25 November 20, 2019. Prior to the hearing, the Debtors resolved approximately 25 formal and  
26 informal objections or responses to the Sale Motion by creditors and parties-in-interest.

27           13.      As contemplated by the Purchase Agreements, in connection with the closing of the  
28 Sales approved by the Jagged Peak and TradeGlobal Sale Orders, the Debtors, ID Logistics, and

1 VSCM negotiated a Transitional Services Agreement dated December 11, 2019 (the “TSA”),  
2 setting forth terms and conditions for the provision of various services by each of them for varying  
3 lengths of time to facilitate the transfer of assets sold under the Purchase Agreements and to enable  
4 the Debtors to continue the administration of their estates.

5 14. Since the Closings, the Debtors have focused their attention on implementing the  
6 TSA, evaluating the assumption or rejection of executory contracts and unexpired leases which  
7 were not assumed and assigned pursuant to the Jagged Peak and TradeGlobal Sale Orders, and  
8 evaluating claims filed against the estates.

9 15. The Debtors submit that there is ample cause to grant the relatively brief extension  
10 of the exclusive periods requested in the Motion. The Debtors are not seeking a significant  
11 extension of the exclusive periods, but a modest extension of 121 days, well within the twenty-  
12 month limitation set forth in Section 1121(d)(2)(B). This extension is requested in good faith and  
13 is in the best interest of the Debtors and their creditors as it will, among other things, 1) allow the  
14 Debtors to finish determining which executory contracts and unexpired leases should be rejected  
15 and which are necessary for implementation of the TSA, 2) obtain an order resolving the motion  
16 of FBF Ohio LLC to compel payment of administrative expense claims, scheduled for hearing on  
17 February 12, 2020, 3) afford the Debtors adequate time to continue evaluating the proofs of claim  
18 filed against the Debtors, including the proofs of claim filed on January 13, 2020 by Singapore  
19 Post Limited in the aggregate amount of approximately \$60 million, and 4) provide the Debtors  
20 time to continue exploring additional strategies for maximizing value for their estates and  
21 creditors.

22 16. While the Debtors’ Chapter 11 Cases are not extraordinarily large, they are complex  
23 because, among other things, the Debtors’ estates included two separate but interrelated operating  
24 businesses with a number of shared suppliers and intercompany agreements, and complicated  
25 dynamics between the Debtors and their ultimate equity holder, Singapore Post Limited.

26 17. The first months of the Chapter 11 Cases were devoted to a relatively fast-paced  
27 sale process that required the sustained attention of the estates’ professionals. The Debtors have  
28 tailored their relatively-brief request to correspond with the anticipated timeline necessary to

1 address outstanding contracts, resolve contested matters, afford the Debtors sufficient time to  
2 evaluate claims, and further explore reorganization strategies to determine the best way to  
3 maximize value.

4 18. The Debtors are seeking this extension not to delay administration of the Chapter  
5 11 Cases or to pressure creditors, but to continue meeting the challenges presented by the Chapter  
6 11 Cases in furtherance of a fair and equitable reorganization plan.

7 19. Since the Petition Date, the Debtors have worked diligently with their creditor  
8 constituencies to advance the Chapter 11 Cases, ensure the Debtors' continued operations through  
9 the sale process, and negotiate sale transactions which would maximize distributions to creditors.  
10 The Debtors are confident that this consensual approach will result in firm support of their plan  
11 from a significant portion of their creditors.

12 20. The Debtors have continuously paid their post-petition obligations as they have  
13 come due in the ordinary course of business in accordance with the Bankruptcy Code.

14 21. This extension is not requested to pressure the Debtors' creditors. As described  
15 above, the Debtors seek an extension of exclusivity in order to resolve contested matters, evaluate  
16 claims, and explore additional strategies for maximizing value for their estates and creditors. The  
17 requested extension will enable the Debtors to focus on formulating a consensual plan without the  
18 potential distraction of competing plans being filed.

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22. Debtors are seeking the brief extension only to allow them to have time to meaningfully evaluate the claims against them, to engage in plan negotiations, and to move toward confirmation of a plan without the potential distraction of a competing plan or the cost and expenses associated with a competing plan. The requested extension is therefore neither detrimental to nor prejudicial to the Debtors' creditors. Rather, it alleviates the potentially needless incurrence of fees and costs which would be harmful to the estates and the Debtors' ability to reorganize.

I declare under penalty of perjury of the laws of the United States that these facts are true to the best of my knowledge and belief.

DATED this 14th day of January, 2020.

By: /s/ Jeremy Rosenthal  
JEREMY ROSENTHAL