

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

| | | |
|----------------------|---|----------------------------------|
| In re: |) | Chapter 11 |
| |) | |
| KIKO USA, Inc., |) | Case No. 18-10069 (MFW) |
| |) | |
| Debtor. ¹ |) | Related to Docket No. 258 |
| |) | |
| |) | |

**NOTICE OF FILING OF (I) NON-MATERIAL
MODIFICATIONS TO PROPOSED PLAN AND (II) PROPOSED
ORDER CONFIRMING AMENDED CHAPTER 11
PLAN OF REORGANIZATION FOR KIKO USA, INC.**

PLEASE TAKE NOTICE THAT on May 9, 2018, the United States Bankruptcy Court for the District of Delaware (the “Court”) entered an order [Docket No. 256] (the “Solicitation Procedures Order”): (a) authorizing KIKO USA, Inc. (the “Debtor”) to solicit acceptances for the *Amended Chapter 11 Plan of Reorganization for KIKO USA, Inc.* (as may be modified, amended, or supplemented from time to time, the “Plan”);² and (b) approving, among other things, (i) the *Disclosure Statement in Connection with Amended Chapter 11 Plan of Reorganization for KIKO USA, Inc.* as containing “adequate information” pursuant to section 1125 of the Bankruptcy Code; (ii) the solicitation materials and documents to be included in the solicitation packages; and (iii) the procedures for soliciting, receiving, and tabulating votes on the Plan and for filing objections to the Plan.

PLEASE TAKE FURTHER NOTICE THAT a hearing on confirmation of the Plan (the “Confirmation Hearing”) will be held before the Honorable Mary F. Walrath, United States Bankruptcy Judge, at the United States Bankruptcy Court, 824 Market Street, 5th Floor, Courtroom #4, Wilmington, Delaware 19801, on **June 18, 2018 at 10:30 a.m.** (prevailing Eastern Time). **The Confirmation Hearing may be continued from time to time without further notice other than the announcement of the adjourned date(s) at the Confirmation Hearing or any continued hearing or in any notice of agenda filed with the Bankruptcy Court or otherwise.**

PLEASE TAKE FURTHER NOTICE THAT the Debtor has made certain non-material changes to the proposed Plan, which changes are referenced in the “redline” version of the Plan attached hereto as **Exhibit A** and incorporated by reference herein.

PLEASE TAKE FURTHER NOTICE THAT the Debtor hereby files its proposed *Order Confirming Amended Chapter 11 Plan Of Reorganization For KIKO USA, Inc.*, a copy of which is attached hereto as **Exhibit B** and incorporated by reference herein.

¹ The last four digits of the Debtor’s federal tax identification number are 0805.

² Capitalized terms not otherwise defined herein shall have the same meanings as set forth in the Plan.

Dated: June 14, 2018
Wilmington, Delaware

/s/ Mark Minuti
Mark Minuti (DE Bar No. 2659)
SAUL EWING ARNSTEIN & LEHR LLP
1201 N. Market Street, Suite 2300
P.O. Box 1266
Wilmington, Delaware 19899
Telephone: (302) 421-6840
Facsimile: (302) 421-5873
mark.minuti@saul.com

-and-

Sharon L. Levine (admitted *pro hac vice*)
SAUL EWING ARNSTEIN & LEHR LLP
1037 Raymond Boulevard, Suite 1520
Newark, New Jersey 07102
Telephone: (973) 286-6718
Facsimile: (973) 286-6821
sharon.levine@saul.com

-and-

John S. Kaplan (admitted *pro hac vice*)
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Telephone: (206) 359-8408
Facsimile: (206) 359-9408
jkaplan@perkinscoie.com

-and-

Jeffrey D. Vanacore (admitted *pro hac vice*)
PERKINS COIE LLP
30 Rockefeller Plaza, 22nd Floor
New York, New York 10112-0085
Telephone: (212) 262-6912
Facsimile: (212) 977-1642
jvanacore@perkinscoie.com

Counsel for Debtor and Debtor in Possession