

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

In re:

SGR WINDDOWN, INC., *et al.*

Debtors.¹

Chapter 11

Case No. 19-11973 (MFW)

(Jointly Administered)

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON MAY 12, 2020 AT 2:00 P.M. (ET)**

**PLEASE TAKE FURTHER NOTICE THAT THE HEARING IS
PROCEEDING TELEPHONICALLY ONLY. DO NOT COME TO THE COURTHOUSE.
ANY PARTY WHO WISHES TO ATTEND THE STATUS CONFERENCE IS
REQUIRED TO MAKE ARRANGEMENTS THROUGH COURTCALL BY
TELEPHONE (888-882-6878) OR FACSIMILE (310-743-1850).**

RESOLVED MATTERS:

1. Motion for Entry of an Order: (a) Granting Relief from the Automatic Stay to Permit Disposition of Matter on Appeal to Final Judgment, (b) Authorizing Creditor to Pursue Recovery Against Debtors Insurance, and (c) Granting Related Relief [D.I. [551](#); Filed March 20, 2020]

Objection Deadline: April 3, 2020 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents:

- A. Amended Notice of Hearing Regarding Motion for Entry of an Order: (a) Granting Relief from the Automatic Stay to Permit Disposition of Matter on Appeal to Final Judgment, (b) Authorizing Creditor to Pursue Recovery Against Debtors Insurance, and (c) Granting Related Relief [D.I. [580](#); Filed: April 6, 2020]
- B. Certificate of No Objection [D.I. [582](#); Filed: April 6, 2020]

Status: An Order has been entered and no hearing is required.

2. Motion of the Debtors and Debtors-In-Possession for Order Pursuant to 11 U.S.C. 105(A) and Fed. R. Bankr. P. 9019(B) Authorizing and Approving Settlement [D.I. [607](#); Filed April 24, 2020]

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number or Canadian Revenue Agency, as applicable are (1) SGR Winddown, Inc. (4356), (2) SGR Winddown International, LLC (1254) and (3) SGR Canada Winddown Legacy, Ltd. (4480). The location of the Debtors' corporate headquarters is 4712 Admiralty Way #552, Marina Del Rey, CA 90292.

Objection Deadline: May 5, 2020 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents: None.

A. Certificate of No Objection [D.I. [621](#); Filed: May 6, 2020]

Status: An Order has been entered and no hearing is required.

MATTERS UNDER CERTIFICATION OF COUNSEL:

3. Interim Fee Applications:

- A. Second Interim Fee Application of Shulman Bastian Friedman & Bui LLP for the period December 1, 2019 to February 29, 2020 [D.I. [590](#); Filed: April 14, 2020]
- B. Second Interim Fee Application of Morris James LLP for the period December 1, 2019 to February 29, 2020 [D.I. [591](#); Filed: April 14, 2020]
- C. Second Interim Fee Application of Force Ten Partners for the period December 1, 2019 to February 29, 2020 [D.I. [592](#); Filed: April 14, 2020]
- D. Second Interim Fee Application of BMC Group Inc. for the period December 1, 2019 to February 29, 2020 [D.I. [593](#); Filed: April 14, 2020]
- E. Second Interim and Final Fee Application of FisherBroyles LLP for the period December 1, 2019 to February 29, 2020 [D.I. [594](#); Filed: April 14, 2020]
- F. Second Interim Fee Application of Province, Inc. for the period December 1, 2019 to February 29, 2020 [D.I. [602](#); Filed: April 17, 2020]
- G. Second Interim Fee Application of Bayard, P.A. for the period December 1, 2019 to February 29, 2020 [D.I. [603](#); Filed: April 17, 2020]

Objection Deadlines: May 4, 2020 at 4:00 pm. (ET) and May 7, 2020 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents:

A. Certification of Counsel [D.I. TBD, Filed: TBD]

Status: A Certification of Counsel will be filed with the Court before the hearing. If the Order is entered, no hearing is necessary unless requested by the Court.

ADJOURNED MATTERS:

4. Motion for Entry of an Order (A) Allowing Administrative Expense Claim Pursuant to Section 503(b) of the Bankruptcy Code; (B) Requiring Payment; and (C) Waiving the Requirements of Local Rule 2016-2 [D.I. [537](#); Filed: March 10, 2020]

Objection Deadline: March 24, 2020 at 4:00 p.m. (ET) (extended until April 3, 2020 for the Debtors and the Official Committee of Unsecured Creditors))

Objections/Responses Received:

- A. Preliminary Objection of the Official Committee of Unsecured Creditors to Payment of Candy Cube's Lender Expenses [D.I. [538](#); Filed: March 10, 2020]
- B. Joinder of Debtors In Support of the Preliminary Objection of the Official Committee of Unsecured Creditors to Payment of Expenses of Candy Cube Holdings, LLC [D.I. [541](#); Filed: March 11, 2020]
- C. Revised Joinder of Debtors In Support of the Preliminary Objection of the Official Committee of Unsecured Creditors to Payment of Expenses of Candy Cube Holdings, LLC [D.I. [543](#); Filed: March 11, 2020]
- D. U.S. Trustee's Objection to the Motion For Entry Of An Order (A) Allowing Administrative Expense Claim Pursuant To Section 503(B) Of The Bankruptcy Code; (B) Requiring Payment; And (C) Waiving The Requirements Of Local Rule 2016-2 [D.I. [560](#); Filed: March 25, 2020]
- E. Supplemental Objection Of The Official Committee Of Unsecured Creditors To Payment Of Candy Cube's Lender Expenses [D.I. [561](#); filed March 26, 2020]

Related Documents:

- F. Exhibit A to the Preliminary Objection of the Official Committee of Unsecured Creditors to Payment of Candy Cube's Lender Expenses [D.I. [539](#); Filed: March 10, 2020]
- G. Notice of Hearing Regarding Preliminary Objection of the Official Committee of Unsecured Creditors to Payment of Candy Cubes Lender Expenses [D.I. [540](#); Filed: March 10, 2020]
- H. Notice of Filing of Certain Amended Exhibits to: Candy Cube Holdings LLC's Motion for Entry of an Order (A) Allowing Administrative Expense Claim Pursuant to Section 503(b) of the Bankruptcy Code; (B) Requiring Payment; and (C) Waiving the Requirement of Local Rule 2016-2 [D.I. [544](#); Filed: March 12, 2020]

Status: This matter is continued until the June 16, 2020 at 10:30 a.m.

MATTERS GOING FORWARD:

5. Chapter 11 Plan of Reorganization for SGR Winddown, Inc. and Affiliated Debtors [D.I. [518](#); Filed: February 24, 2020]

Objection Deadline: March 24, 2020 at 4:00 p.m. (ET), extended until May 4, 2020 for certain parties.

Objections/Responses Received:

- A. Reservation of Rights and Protective Objection of Joshua Resnick and Rosie O'Neill to Plan of Reorganization for SGR Winddown, Inc., and Affiliated Debtors Dated February 24, 2020 [D.I. [556](#); Filed: March 24, 2020]
- B. Limited Objection of Federal Realty Investment Trust, The Forbes Company, The Macerich Company, and The Related Companies to Debtors Plan Of Reorganization For SGR Winddown, Inc. and Affiliated Debtors [D.I. [616](#); Filed: May 1, 2020]
- C. Limited Objection of Turnberry Associates to Confirmation of Plan of Reorganization for SGR Winddown, Inc. and Affiliate Debtors' Dated February 24, 2020 [D.I. [617](#); Filed: May 1, 2020]

Related Documents:

- D. Disclosure Statement for the Plan of Reorganization for SGR Winddown, Inc. and Affiliated Debtors [D.I. [517](#); Filed: February 24, 2020]
- E. Debtors' Motion for Entry of an Order (I) Approving the Adequacy of Information in the Disclosure Statement, (II) Approving the Solicitation and Notice Procedures, (III) Approving the Forms of Ballots and Notices in Connection Therewith, (IV) Scheduling Certain Dates with Respect Thereto, and (V) Granting Related Relief [D.I. [519](#); Filed: February 24, 2020]
- F. Revised Disclosure Statement for the Plan of Reorganization for SGR Winddown, Inc. and Affiliated Debtors [D.I. [563](#); Filed: March 27, 2020];
- G. Blackline Copy of Revised Disclosure Statement for the Plan of Reorganization for SGR Winddown, Inc. and Affiliated Debtors [D.I. [564](#); Filed: March 27, 2020];
- H. Certification of Counsel [D.I. [565](#); Filed: March 27, 2020];
- I. Order (I) Approving the Adequacy of Information in the Revised Disclosure Statement, (II) Approving the Solicitation and Notice Procedures, (III) Approving the Forms of Ballots and Notices in Connection Therewith, (IV) Scheduling Certain Dates with Respect Thereto, and (V) Granting Related Relief [D.I. [568](#); Filed: March 30, 2020]

- J. Notice of Filing of Plan Supplement for Plan of Reorganization for SGR Winddown, Inc. and Affiliated Debtors Dated February 24, 2020 [D.I. [604](#); Filed: April 24, 2020]
- K. Declaration Of Tinamarie Feil Regarding Solicitation and Tabulation of Votes In Connection With The Plan of Reorganization For SGR Winddown, Inc. and Affiliated Debtors Dated February 24, 2020 [D.I. [623](#); Filed: May 8, 2020]
- L. Debtors' Memorandum of Law in Support of an Order Confirming the Plan of Reorganization for SGR Winddown, Inc. and Affiliated Debtors Dated February 24, 2020 [D.I. TBD, TBD]
- M. Declaration Of Lance Miller In Support Of Confirmation Of The Debtors' Plan Of Reorganization [D.I. TBD, TBD]
- N. Proposed Findings of Fact and Conclusions of Law [D.I. TBD, TBD]

Status: The Debtors are working toward – but have not yet finalized – a resolution to the objections to confirmation. Confirmation of the Plan is going forward.

Dated: May 8, 2020

MORRIS JAMES LLP

/s/ Jeffrey R. Waxman

Brya M. Keilson (DE Bar No. 4643)
Jeffrey R. Waxman (DE Bar No. 4159)
Eric J. Monzo (DE Bar No. 5214)
500 Delaware Avenue, Suite 1500
Wilmington, DE 19801
Telephone: (302) 888-6800
E-mail: bkeilson@morrisjames.com
E-mail: jwaxman@morrisjames.com
E-mail: emonzo@morrisjames.com

-and-

SHULMAN BASTIAN FRIEDMAN & BUI LLP

Alan J. Friedman, Esq. (admitted pro hac vice)
Ryan D. O'Dea, Esq. (admitted pro hac vice)
100 Spectrum Center Drive, Suite 600
Irvine, CA 92618
Telephone: (949) 340-3400
Facsimile: (949) 340-3000
E-mail: AFriedman@shulmanbastian.com
E-mail: ROdea@shulmanbastian.com

*Counsel to the Debtors and
Debtors in Possession*