

**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 DECEMBER 3, 2020 AT 10:30 A.M. (ET)**

**ANY PARTY WISHING TO PARTICIPATE IN THE HEARING
MUST APPEAR THROUGH BOTH COURTCALL AND ZOOM.**

Join ZoomGov Meeting

<https://debuscourts.zoomgov.com/j/1611754011>

Meeting ID: 161 175 4011

Passcode: 249684

**PLEASE NOTE: AUDIO MUST BE MUTED IN ZOOM ONCE CONNECTED.
COURTCALL, LLC WILL PROVIDE THE AUDIO FOR THE HEARING.**

**TO APPEAR TELEPHONICALLY, PARTIES SHOULD CONTACT
COURTCALL, LLC AT 866-582-6878 TO REGISTER THEIR APPEARANCE
BY DECEMBER 2, 2020 AT 12:00 P.M.**

ADJOURNED MATTERS:

1. Debtors' First Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Del. L.R. 3007-1 (Amended Claims; Duplicate Claims; and Late Filed Claims) [D.I. [709](#); Filed: September 3, 2020]

Objection Deadline: October 7, 2020 at 4:00 p.m. (ET)

Objections/Responses Received:

- A. Response in Opposition to Debtors' First Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Del. L.R. 3007-1 (Amended Claims; Duplicate Claims; and Late Filed Claims) by Creditor, Global Apogee [D.I. [726](#); Filed: October 7, 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.

Related Documents:

- A. Certification of Counsel Regarding the Debtors First Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Del. L.R. 3007-1 (Amended Claims; Duplicate Claims; and Late Filed Claims) [D.I. [737](#); Filed: October 14, 2020]
- B. Order Sustaining Debtors' First Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Del. L.R. 3007-1 (Amended Claims; Duplicate Claims; and Late Filed Claims) [D.I. [740](#); Filed: October 15, 2020]

Status: An Order has been entered sustaining the First Omnibus Objection except as to Global Apogee. The Debtors and Global Apogee are working toward a resolution to this matter and a hearing on this matter is continued.

MATTERS GOING FORWARD:

- 2. Debtors' Second Omnibus Objection (Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Del. L.R. 3007-1 (No Liability Claims; Reduce & Allow Claims; Reclassify Claims; and Reduce, Reclassify & Allow Claims) [D.I. [710](#); Filed: September 3, 2020]

Objection Deadline: October 7, 2020 at 4:00 p.m. (ET)

Objections/Responses Received:

- A. Response of the New York City Department of Finance to Debtors' Second Omnibus Objection to Claim No. 205 [D.I. [724](#); Filed: October 7, 2020]
- B. Response in Opposition to Debtors' Second Omnibus Objection (Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Del. L.R. 3007-1 (Amended Claims; Duplicate Claims; and Late Filed Claims) by Creditor, Global Apogee [D.I. [725](#); Filed: October 7, 2020]

Related Documents:

- A. Notice of Submission of Proof of Claim re Second Omnibus Objection (Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Del. L.R. 3007-1 (No Liability Claims; Reduce & Allow Claims; Reclassify Claims; and Reduce, Reclassify & Allow Claims) [D.I. [717](#); Filed: September 29, 2020]
- B. Certification of Counsel Regarding the Debtors' Second Omnibus Objection (Substantive) to Certain Claims Pursuant To 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Del. L.R. 3007-1 (No-Liability Claims; Reduce & Allow Claims; Reclassify Claims; and Reduce, Reclassify & Allow Claims) [D.I. [736](#); Filed: October 14, 2020]
- C. Order Sustaining Debtors' Second Omnibus Objection (Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007 and Del. L.R. 3007-1

(No-Liability Claims; Reduce & Allow Claims; Reclassify Claims; Reduce, Reclassify & Allow Claims) [D.I. [739](#); Filed: October 15, 2020]

- D. Memorandum in Support of Objection to Claim Number 205 of the New York City Department of Finance [D.I. [743](#); Filed: October 23, 2020]
- E. Memorandum of Law in Opposition to Debtors Memorandum of Law and Second Omnibus Objection To DOF Claim No. 205 [D.I. [752](#); Filed: November 6, 2020]
- F. Debtors' Reply in Support of Objection to Claim Number 205 of the New York City Department of Finance [D.I. [753](#); Filed: November 30, 2020]

Status: An Order has been entered sustaining the Second Omnibus Objection except as to Global Apogee and the New York City Department of Finance. The Debtors and Global Apogee are working toward a resolution to this matter, and thus the hearing as to Global Apogee is continued. The hearing is going forward as to New York City Department of Finance's claim.

Dated: December 1, 2020

MORRIS JAMES LLP

/s/ Brya M. Keilson

Jeffrey R. Waxman (DE Bar No. 4159)

Eric J. Monzo (DE Bar No. 5214)

Brya M. Keilson (DE Bar No. 4643)

500 Delaware Avenue, Suite 1500

Wilmington, DE 19801

Telephone: (302) 888-6800

E-mail: jwaxman@morrisjames.com

E-mail: emonzo@morrisjames.com

E-mail: bkeilson@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

E-mail: AFriedman@shulmanbastian.com

E-mail: ROdea@shulmanbastian.com

*Counsel to the Debtors and
Debtors in Possession*