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

	Re: Docket Nos. 308, 309, 394, 399 and 449
Debtors.	) Jointly Administered
SPORTCO HOLDINGS, INC., et al.,1	Case No. 19-11299 (LSS)
In re:	) Chapter 11

### NOTICE OF PROPOSED LIQUIDATION TRUST AGREEMENT

PLEASE TAKE NOTICE that on August 22, 2019, the above-captioned debtors and debtors in possession (the "Debtors") filed the Combined Disclosure Statement and joint Chapter 11 Plan of Liquidation [Docket No. 308] (the "Combined Plan and Disclosure Statement") and the Motion for the Entry of an Order (A) Conditionally Approving the Combined Disclosure Statement and Joint Chapter 11 Plan of Liquidation for Solicitation Purposes Only on Limited Notice, (B) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject Plan of Liquidation, (C) Approving the Form of Ballot and Solicitation Materials, (D) Establishing Voting Record Date, (E) Fixing the Date, Time and Place for the Confirmation Hearing and the Deadline for Filing Objections Thereto, and (F) Approving Related Notice Procedures [Docket No. 309] (the "Conditional Approval Motion") with the United States Bankruptcy Court for the District of Delaware (the "Court").

<sup>&</sup>lt;sup>1</sup> The Debtors, together with the last four digits of each Debtor's federal tax identification number, are: Bonitz Brothers, Inc. (4441); Ellett Brothers, LLC (7069); Evans Sports, Inc. (2654); Jerry's Sports, Inc. (4289); Outdoor Sports Headquarters, Inc. (4548); Quality Boxes, Inc. (0287); Simmons Guns Specialties, Inc. (4364); SportCo Holdings, Inc. (0355); and United Sporting Companies, Inc. (5758). The location of the Debtors' corporate headquarters and the service address for all Debtors is 267 Columbia Ave., Chapin, SC, 29036.

PLEASE TAKE FURTHER NOTICE that on September 13, 2019, the Debtors filed the Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Liquidation [Docket No. 394] (the "Second Amended Combined Disclosure Statement and Plan").

PLEASE TAKE FURTHER NOTICE that on September 17, 2019, the Court entered the Order (A) Approving on Conditional Basis Combined Disclosure Statement and Joint Chapter 11 Plan of Liquidation for Solicitation Purposes Only, (B) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject Combined Disclosure Statement and Plan, (C) Approving the Form of Ballot and Solicitation Materials, (D) Establishing Voting Record Date, (E) Fixing the Date, Time and Place for the Confirmation Hearing and the Deadline for Filing Objections Thereto, and (F) Approving Related Notice Procedures [Docket No. 399] (the "Conditional Approval Order"), which granted conditional approval of the Second Amended Combined Disclosure Statement and Chapter 11 Plan for solicitation purposes only.

PLEASE TAKE FURTHER NOTICE, that on October 4, 2019, the Debtors filed the *Notice of Selection of Liquidation Trustee and Appointment of Oversight Board Members* [Docket No. 449] which reflected the selection of Ronald Friedman of SilvermanAcampora LLP as Liquidation Trustee, and appointment of Robert L. Nabholz, Matthew Barry, and Jim Hanus as the initial members of the Oversight Board.

PLEASE TAKE FURTHER NOTICE, as contemplated within the Second Amended Combined Disclosure Statement and Chapter 11 Plan, of the Debtors' filing of the Liquidation Trust Agreement, a true and correct copy of which is attached hereto as **Exhibit A**, as a Plan Supplement.

Dated: October 7, 2019 Wilmington, Delaware

## **POLSINELLI PC**

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# Exhibit A

Liquidation Trust Agreement