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

In re:	)	Chapter 11
UBI Liquidating Corp., et al.,1	)	Case No. 10-13005 (KJC)
Debtors.	)	Jointly Administered
	)	

## NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING ON MARCH 29, 2011 AT 11:00 A.M. (EDT)<sup>2</sup>

## I. RESOLVED MATTERS:

1. Motion of Two-One-Two New York, Inc. for Allowance and Payment of Administrative Expense Pursuant to 11 U.S.C. § 503(b)(9) [Docket No. 467; filed November 5, 2010]

Objection Deadline: December 10, 2010 at 4:00 p.m. (EST); extended to

January 6, 2011 at 4:00 p.m. (EST).

Objections/Responses Received: None to date.

<sup>&</sup>lt;sup>1</sup> The Debtors in these cases, along with the last four digits of the federal tax identification number for each of the Debtors, are UBI Liquidating Corp. (3678), 100% Girls Ltd. (4150), 100% Girls of Georgia, Inc. (4159), 100% Girls of New York, Inc. (2149), 100 Percent Girls of New Jersey, Inc. (4167), A.S. Interactive, Inc. (3472), ASL Liquidating Corp. (4541), Ashley Stewart Apparel Corporation (4049), Ashley Stewart Clothing Company, Inc. (4051), ASMCI Liquidating Corp. (4053), ASWL Liquidating Corp. (4152), ASIL 6, Inc. (3996), ASNJ 10, Inc. (4004), Carraizo Alto Apparel Corporation (4651), Church Street Retail, Inc. (5954), Kid Spot Ltd. (2585), Kidspot of Delaware, Inc. (2596), Kidspot of Illinois, Inc. (2606), Kidspot of Michigan, Inc. (2603), Kidspot of New Jersey, Inc. (2601), Kidspot of Ohio, Inc. (4705), Kidspot of Pennsylvania, Inc. (2599), Kidspot of Texas, Inc. (3809), Large Apparel of Alabama, Inc. (0624), Large Apparel of California, Inc. (2129), Large Apparel of Connecticut, Inc. (5161), Large Apparel of District of Columbia, Inc. (8613), Large Apparel of Florida, Inc. (2209), Large Apparel of Georgia, Inc. (3894), Large Apparel of Illinois, Inc. (4650), Large Apparel of Indiana, Inc. (4055), Large Apparel of Louisiana, Inc. (3790), Large Apparel of Maryland, Inc. (5158), Large Apparel of Michigan, Inc. (9420), Large Apparel of Mississippi, Inc. (5913), Large Apparel of Missouri, Inc. (2135), Large Apparel of New Jersey, Inc. (5157), Large Apparel of New York, Inc. (5956), Large Apparel of North Carolina, Inc. (8611), Large Apparel of Ohio, Inc. (3815), Large Apparel of Pennsylvania, Inc. (4057), Large Apparel of South Carolina, Inc. (2029), Large Apparel of Tennessee, Inc. (3895), Large Apparel of Texas, Inc. (3787), Large Apparel of Virginia, Inc. (2809), Large Apparel of Wisconsin, Inc. (3898), Marianne Ltd. (3940), Marianne USPR, Inc. (2193), Marianne VI, Inc. (2206), Metro Apparel of Kentucky, Inc. (7533), Metro Apparel of Massachusetts, Inc. (1367), The Essence of Body & Soul, Ltd. (4165), UACONJI Liquidating Corp. (2976), UACONYI Liquidating Corp. (4103), and UBTHC Liquidating Corp. (5909). The Debtors' corporate offices are located at 100 Metro Way, Secaucus, New Jersey 07094.

<sup>&</sup>lt;sup>2</sup> The hearing will be held before The Honorable Kevin J. Carey at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 5<sup>th</sup> Floor, Courtroom 5, Wilmington, Delaware 19801. Any party who wishes to appear telephonically at the March 29, 2011 hearing must contact COURTCALL, LLC at 866-582-6878 prior to 12:00 p.m. (noon) (Eastern Daylight Time) on Monday, March 28, 2011 in accordance with the Instructions for Telephonic Appearances Effective January 5, 2005, Revised April 27, 2009.

#### Related Documents:

- i. Certification of Counsel Regarding Stipulation Regarding Allowed Administrative and Unsecured Claims of Two-One-Two New York, Inc. [Docket No. 947; filed February 22, 2011]
- ii. Order Approving Stipulation Regarding Allowed Administrative and Unsecured Claims of Two-One-Two New York, Inc. [Docket No. 949; filed February 23, 2011]

Status: On February 23, 2011, the Court entered the order resolving this matter. Accordingly, no hearing is necessary.

2. Motion of Gwendolyn Scott-Adams for Relief from Stay Under Bankruptcy Code Section 362(d), Bankruptcy Rule 4001 and Local Bankruptcy Rule 4001-1 [Docket No. 538; filed November 30, 2010]

Objection Deadline: December 10, 2010 at 4:00 p.m. (EST); extended to January 6, 2011 at 4:00 p.m. (EST).

Objections/Responses Received: None to date.

# Related Documents:

- i. Declaration of Charles H. Jeanfreau in Support of Motion of Gwendolyn Scott-Adams for Relief from Stay Under Bankruptcy Code Section 362 (d), Bankruptcy Rule 4001 and Local Bankruptcy Rule 4001-1 [Docket No. 539; filed November 30, 2010]
- ii. Exhibits "A" and "B" to Declaration of Charles H. Jeanfreau in Support of Motion of Gwendolyn Scott-Adams for Relief from Stay [Docket No. 541; filed December 1, 2010]

<u>Status</u>: The parties have resolved this matter and are working to document the resolution.

## II. CONTESTED MATTER GOING FORWARD:

3. Debtors' Motion Pursuant to 11 U.S.C. §§ 105(a), 363, and 365, and Bankruptcy Rules 2002, 6004, and 6006 for (I) Entry of an Order (A) Establishing Bidding and Auction Procedures Related to the Sale of Substantially All of the Debtors' Assets; (B) Approving Related Bid Protections; (C) Scheduling an Auction and Sale Hearing; (D) Establishing Certain Notice Procedures for Determining Cure Amounts for Executory Contracts and Leases to Be Assigned; and (E) Granting

Certain Related Relief; and (II) Entry of an Order (A) Approving the Sale of Substantially All of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances and Interests; (B) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; (C) Establishing Assumption and Rejection Procedures for Certain Additional Executory Contracts and Unexpired Leases; (D) Approving Guidelines for Conducting Store Closing Sales; (E) Approving Agency Agreement; and (F) Extending the Deadline to Assume or Reject Unexpired Leases of Nonresidential Real Property Pursuant to 11 U.S.C. § 365(d)(4) [Docket No. 34; filed September 22, 2010]

## Objections/Responses Received:

- A. Objection of Ramco Jacksonville, LLC to Debtors' Notice of Proposed Lease Cure Amount [Docket No. 205; filed October 14, 2010]
  - i. Withdrawal of Cure Objection (of Ramco Jacksonville, LLC) [Docket No. 1155; filed March 18, 2011]
- Status: On March 18, 2011, Ramco Jacksonville, LLC withdrew this objection to the proposed cure amount. Accordingly, no hearing is necessary unless the Court has any questions or concerns.
- B. Objection of North Riverside Park Associates LLC to Debtors' Proposed Cure Amount for Unexpired Lease of Nonresidential Real Property [Docket No. 208; filed October 15, 2010]

Status: This objection was resolved by mutual agreement of the parties.

- C. Objection and Counterstatement of Preit Services, LLC to Debtors' Corrected Notice of Executory Contracts and Unexpired Leases Which May Be Assumed and Assigned Pursuant to Section 365 of the Bankruptcy Code in Connection with the Sale of Substantially All of the Debtors' Assets and the Proposed Cure Amounts with Respect Thereto [Docket No. 209; filed October 15, 2010]
  - i. Withdrawal of Objection and Counterstatement of Preit Services, LLC, to Debtors' Corrected Notice of Cure [Docket No. 1169; March 22, 2011]
- Status: On March 22, 2011, Preit Services, LLC withdrew this objection to the proposed cure amount. Accordingly, no hearing is necessary unless the Court has any questions or concerns.
- D. Objection of Union Realty Company GP to Proposed Cure Amount in Debtor's Corrected Notice of Executory Contracts and Unexpired Leases Which May Be Assumed and Assigned, Pursuant to Section 365 of the

Bankruptcy Code, in Connection with the Sale of Substantially All of the Debtors' Assets [Docket No. 210; filed October 15, 2010]

- i. Notice of Withdrawal of Objection of Union Realty Company GP to Proposed Cure Amount in Debtor's Corrected Notice of Executory Contracts and Unexpired Leases Which May Be Assumed and Assigned, Pursuant to Section 365 of the Bankruptcy Code, in Connection with the Sale of Substantially All of the Debtors' Assets [Docket No. 1144; filed March 17, 2011]
- Status: On March 17, 2011, Union Realty Company GP withdrew this objection to the proposed cure amount. Accordingly, no hearing is necessary unless the Court has any questions or concerns.
- E. Objection of Centro GA Apollo II Sub LLC to Proposed Cure Amounts [Docket No. 211; filed October 15, 2010]
- Status: This objection to the proposed cure amount was mutually resolved by the parties. Accordingly, no hearing is necessary unless the Court has any questions or concerns.
- F. Objection of Green Acres Mall, LLC to Proposed Cure Amount [Docket No. 212; filed October 15, 2010]
  - i. Order, Pursuant to Sections 105, 363 and 365 of the Bankruptcy Code and Bankruptcy Rules 2002, 6004 And 6006, (I) Approving the Assumption and Assignment of Lease between Large Apparel of New York, Inc. and Green Acres Mall, LLC to New Ashley Stewart Inc. and (II) Resolving Cure Objection [Docket No. 1162; filed March 22, 2011]
- Status: On March 22, 2011, this objection to the proposed cure amount was mutually resolved by the parties in the assumption order. Accordingly, no hearing is necessary unless the Court has any questions or concerns.
- G. Objection of Alexander's King Plaza, LLC to Proposed Cure Amount [Docket No. 213; filed October 15, 2010]
  - i. Order, Pursuant to Sections 105, 363 and 365 of the Bankruptcy Code and Bankruptcy Rules 2002, 6004 And 6006, (I) Approving the Assumption and Assignment of Lease between Large Apparel of New York, Inc. and Alexander's King Plaza, LLC to New Ashley Stewart Inc. and (II) Resolving Cure Objection [Docket No. 1163; filed March 22, 2011]

Status: On March 22, 2011, this objection to the proposed cure amount was

- mutually resolved by the parties in the assumption order. Accordingly, no hearing is necessary unless the Court has any questions or concerns.
- H. Jackson Metrocenter Mall Ltd's Limited Objection to Cure Claim Amount [Docket No. 215; filed October 15, 2010]
- Status: The lease for store 277 expired by its terms during the pendency of these chapter 11 cases. As a result, the cure objection of Jackson Metrocenter Mall Ltd. is moot.
- I. G/W Jefferson-St. Jean, LLC's Limited Objection to Cure Claim Amount [Docket No. 216; filed October 15, 2010]
  - i. Withdrawal of Cure Objection (of G/W Jefferson-St. Jean, LLC) [Docket No. 1156; filed March 21, 2011]
- Status: On March 21, 2011, G/W Jefferson-St. Jean, LLC withdrew this objection to the proposed cure amount. Accordingly, no hearing is necessary unless the Court has any questions or concerns.
- J. Objection of EMG, LLC to Debtor's Notice of Proposed Lease Cure Amount [Docket No. 218; filed October 17, 2010]
  - i. Withdrawal of Cure Objection (of EMG, LLC) [Docket No. 1083; filed March 4, 2011]
- Status: On March 4, 2011, EMG, LLC withdrew this objection to the proposed cure amount. Accordingly, no hearing is necessary unless the Court has any questions or concerns.
- K. Objection of Hartz Mountain Metropolitan to Debtors' Proposed Cure Amount [Docket No. 219; filed October 18, 2010]
  - Amended Objection of Hartz Mountain Metropolitan to Debtors' Proposed Cure Amount [Docket No. 650; filed January 6, 2011]
  - ii. Order, Pursuant to Sections 105, 363 and 365 of the Bankruptcy Code and Bankruptcy Rules 2002, 6004 And 6006, (I) Approving the Assumption and Assignment of Lease between Ashley Retail Stores, Inc. and Hartz Mountain Metropolitan to New Ashley Stewart Inc. and (ii) Resolving Cure Objection [Docket No. 931; filed February 17, 2011]
- Status: On February 17, 2011, this objection to the proposed cure amount was mutually resolved by the parties in the assumption order. Accordingly, no

- hearing is necessary unless the Court has any questions or concerns.
- L. Lease Cure Objection of Cohen/Jemal Partnership, LLC [Docket No. 220; filed October 18, 2010]
  - i. Withdrawal of Cure Objection (of Cohen/Jemal Partnership, LLC) [Docket No. 1093; filed March 9, 2011]
- Status: On March 9, 2011, Cohen/Jemal Partnership, LLC withdrew this objection to the proposed cure amount. Accordingly, no hearing is necessary unless the Court has any questions or concerns.
- M. Limited Objection of Dutch Square Limited Liability Company to Cure Amount [Docket No. 221; filed October 18, 2010]
  - i. Order, Pursuant to Sections 105, 363 and 365 of the Bankruptcy Code and Bankruptcy Rules 2002, 6004 And 6006, (I) Approving the Assumption and Assignment of Lease between Large Apparel of South Caroline, Inc. and Dutch Square Limited Liability Co. to New Ashley Stewart Inc. and (ii) Resolving Cure Objection [Docket No. 1164; filed March 22, 2011]
- <u>Status</u>: On March 22, 2011, this objection to the proposed cure amount was mutually resolved by the parties in the assumption order. Accordingly, no hearing is necessary unless the Court has any questions or concerns.
- N. Limited Objection of Kimco Baton Rouge 1183, LLC and KIR Augusta II L.P. to Corrected Notice of Executory Contracts and Unexpired Leases Which May Be Assumed and Assigned, Pursuant to Section 365 of the Bankruptcy Code, in Connection with the Sale of Substantially All of the Debtors' Assets and the Proposed Cure Amounts with Respect Thereto [Docket No. 223; filed October 19, 2010]
  - i. Notice of Withdrawal of Limited Objection of Kimco Baton Rouge 1183, LLC and KIR Augusta II L.P. to Corrected Notice of Executory Contracts and Unexpired Leases Which May Be Assumed and Assigned, Pursuant to Section 365 of the Bankruptcy Code, in Connection with the Sale of Substantially All of the Debtors' Assets and the Proposed Cure Amounts with Respect Thereto [Related to Docket No. 104] [Docket No. 1084; filed March 4, 2011]
- Status: On March 4, 2011, Kimco Baton Rouge 1183, LLC and KIR Augusta II L.P. withdrew this objection to the proposed cure amount. Accordingly, no hearing is necessary unless the Court has any questions or concerns.

- O. Limited Objection of BLDG-ICS Olney, LLC and CP Associates LLC to Debtors' Proposed Cure Amount for Unexpired Lease of Nonresidential Real Property [Docket No. 225; filed October 19, 2010]
- <u>Status</u>: This objection to the proposed cure amount will go forward at the hearing. The parties are working to resolve this matter.
- P. Objection of Hendon Golden East, LLC to Debtors' Motion Establishing Certain Notice Procedures for Determining Cure Amount for Executory Contracts and Leases to be Assigned [Docket No. 226; filed October 19, 2010]
  - i. Withdrawal of Cure Objection (of Hendon Golden East, LLC) [Docket No. 983; filed February 24, 2011]
- Status: On February 24, 2011, Hendon Golden East, LLC withdrew this objection to the proposed cure amount. Accordingly, no hearing is necessary unless the Court has any questions or concerns.
- Q. Objection of Culver Center Partners Georgia, LLC and Culver Center Partners Georgia - West #1 LLC, As Successor-in-Interest to DBSI, Inc., As Successor-in-Interest to Hendon Old National, LLC to Debtors' Motion Establishing Certain Notice Procedures for Determining Cure Amount for Executory Contracts and Leases to be Assigned [Docket No. 227; filed October 19, 2010]
  - i. Withdrawal of Cure Objection (of Culver Center Partners Georgia, LLC and Culver Center Partners Georgia West # 1 LLC, as successor-in-interest to DBSI, Inc., as successor-in-interest to Hendon Old National, LLC) [Docket No. 1088; filed March 8, 2011]
- Status: On March 8, 2011, Culver Center Partners Georgia, LLC and Culver Center Partners Georgia West # 1 LLC, as successor-in-interest to DBSI, Inc., as successor-in-interest to Hendon Old National, LLC withdrew this objection to the proposed cure amount. Accordingly, no hearing is necessary unless the Court has any questions or concerns.
- R. Objection of HT West End, LLC to Debtors' Motion Establishing Certain Notice Procedures for Determining Cure Amount for Executory Contracts and Leases to be Assigned [Docket No. 228; filed October 19, 2010]
  - i. Withdrawal of Cure Objection (of HT West End, LLC) [Docket No. 941; filed February 18, 2011]

Status: On February 18, 2011, HT West End, LLC withdrew this objection to the

- proposed cure amount. Accordingly, no hearing is necessary unless the Court has any questions or concerns.
- S. Limited Objection of RREEF Management Company, The Prudential Insurance Company of America, and Watt Management Company to the Corrected Notice of Executory Contracts and Unexpired Leases Which May Be Assumed and Assigned, Pursuant to Section 365 of the Bankruptcy Code, in Connection with the Sale of Substantially All of the Debtors' Assets and the Proposed Cure Amounts with Respect Thereto [Docket No. 229; filed October 19, 2010]

<u>Status</u>: The objection to the proposed cure amount will go forward. The parties are working to resolve this matter.

- T. Limited Objection to Cure Amount by Chicago Building, L.L.C., By Its Management Agent, Mid-America Asset Management, Inc., the Landlord for the Chicago Building [Docket No. 230; filed October 19, 2010]
  - i. Limited Objection to Assumption and Assignment by Chicago Building, L.L.C., by its Management Agent, Mid-America Asset Management, Inc., the Landlord for the Chicago Building [Docket No. 811; filed February 8, 2011].
  - ii. Order, Pursuant to Sections 105, 363 and 365 of the Bankruptcy Code and Bankruptcy Rules 2002, 6004 And 6006, (I) Approving the Assumption and Assignment of Lease between Large Apparel of Illinois, Inc. and Chicago Building, LLC to New Ashley Stewart Inc. and (II) Resolving Cure Objection [Docket No. 1091; filed March 9, 2011]
- <u>Status</u>: On March 9, 2011, this objection to the proposed cure amount was mutually resolved by the parties in the assumption order. Accordingly, no hearing is necessary unless the Court has any questions or concerns.
- U. Objection of EGI Properties, L.L.C. to Debtors' Proposed Cure Amount [Docket No. 231; filed October 19, 2010]
- Status: The parties have resolved this objection and the Debtors anticipate that this objection will be withdrawn.
- V. Limited Objection to Cure Amount by C. Michelle Panovich of Mid-America Asset Management, Inc., As Court Appointed Receiver for Lincoln Mall [Docket No. 232; filed October 19, 2010]
  - i. Withdrawal of Cure Objection (of C. Michelle Panovich of Mid-America Asset Management, Inc., As Court Appointed Receiver

- Status: On March 10, 2011, C. Michelle Panovich of Mid-America Asset Management, Inc., As Court Appointed Receiver for Lincoln Mall withdrew this objection to the proposed cure amount. Accordingly, no hearing is necessary unless the Court has any questions or concerns.
- W. Objection (of Lincoln Center, a Michigan General Partnership) to Corrected Notice of Executory Contracts and Unexpired Leases Which May Be Assumed and Assigned, Pursuant to Section 365 of the Bankruptcy Code, in Connection with the Sale of Substantially All of the Debtors' Assets and the Proposed Cure Amounts with Respect Thereto [Docket No. 233; filed October 19, 2010]
- <u>Status</u>: This objection to the proposed cure amount will go forward at the hearing. The parties are working to resolve this matter.
- X. Limited Objection of Glimcher Properties Limited Partnership to Debtors'
  (1) Proposed Lease Cure Amounts and (2) Potential Assumption and Assignment of Certain Unexpired Leases [Docket No. 236; filed October 19, 2010]
  - i. Notice of Withdrawal of Limited Objection of Glimcher Properties Limited Partnership to Debtors' (1) Proposed Lease Cure Amounts and (2) Potential Assumption and Assignment of Certain Unexpired Leases [Docket No. 1095; filed March 9, 2011]
- Status: On March 9, 2011, Glimcher Properties Limited Partnership withdrew this objection to the proposed cure amount. Accordingly, no hearing is necessary unless the Court has any questions or concerns.
- Y. The Taubman Landlords' Precautionary Objection to the Motion for Approval of Sale of Assets and Potential Assumption and Assignment of Real Property Lease, Objection to Request for Authorization to Conduct Going Out of Business Sales, and Cure Claim Objection [Docket No. 237; filed October 19, 2010]
- <u>Status</u>: This objection to the proposed cure amount was mutually resolved by the parties. Accordingly, no hearing is necessary unless the Court has any questions or concerns.
- Z. Objection of Inland US Management, LLC and Inland American Retail Management, LLC to Corrected Notice of Executory Contracts and Unexpired Leases Which May Be Assumed and Assigned Pursuant to Section 365 of the Bankruptcy Code in Connection with the Sale of Substantially All of the Debtors' Assets and the Proposed Cure Amounts

- with Respect Thereto [Docket No. 238; filed October 19, 2010]
- <u>Status</u>: This objection to the proposed cure amount will go forward at the hearing. The parties are working to resolve this matter.
- AA. Limited Objection and Reservation of Rights of Banc of America Merchant Services, LLC to the Debtors' Corrected Notice of Executory Contracts and Unexpired Leases Which May Be Assumed and Assigned, Pursuant to Section 365 of the Bankruptcy Code, in Connection with the Sale of Substantially All of the Debtors' Assets and the Proposed Cure Amounts with Respect Thereto [Docket No. 239; filed October 19, 2010]
- <u>Status</u>: The parties have resolved this objection and the Debtors anticipate that this objection will be withdrawn.
- BB. Objection of Linder Ventures IV, L.L.C. to Debtor's Notice of Proposed Lease Cure Amount [Docket No. 240; filed October 19, 2010]
- Status: This objection to the proposed cure amount was mutually resolved by the parties. Accordingly, no hearing is necessary unless the Court has any questions or concerns.
- CC. Objection (of Stony Island, LLC) to Cure Amount in Relation to Debtors' Sale Motion [Docket No. 241; filed October 19, 2010]
  - i. Order, Pursuant to Sections 105, 363 and 365 of the Bankruptcy Code and Bankruptcy Rules 2002, 6004 And 6006, (I) Approving the Assumption and Assignment of Lease between Large Apparel of Illinois, Inc. and 95<sup>th</sup> & Stony I, LLC to New Ashley Stewart Inc. and (II) Resolving Cure Objection [Docket No. 1051; filed March 1, 2011]
- Status: On March 1, 2011, this objection to the proposed cure amount was mutually resolved by the parties in the assumption order. Accordingly, no hearing is necessary unless the Court has any questions or concerns.
- DD. Objection to Cure Amounts by Westfield, LLC and Certain Affiliates in Accordance with Order (A) Establishing Bidding and Auction Procedures Related to the Sale of Substantially All of the Debtors' Assets; (B) Approving Related Bid Protections; (C) Scheduling an Auction and Sale Hearing; (D) Establishing Certain Notice Procedures for Determining Cure Amounts for Executory Contracts and Leases to be Assigned; and (E) Granting Certain Related Relief [Docket No. 242; filed October 19, 2010]

- <u>Status</u>: This objection to the proposed cure amount will go forward at the hearing. The parties are working to resolve this matter.
- EE. MSKP Orlando Square, LLC's (I) Objection to Proposed Cure Amount; and (II) Limited Objection to Debtor's Motion Seeking Entry of Order (A) Approving the Sale of Substantially All of the Debtor's Assets Free and Clear of All Liens, Claims, Encumbrances and Interests; (B) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; (D) Approving Guidelines for Conducting Store Closing Sales; (E) Approving Agency Agreement; and (F) Extending the Deadline to Assume or Reject Unexpired Leases of Nonresidential Real Property Pursuant to 11 U.S.C. § 365(d)(4); Declaration of Steven Messing Attached Hereto [Docket No. 244; filed October 19, 2010]
  - i. Order, Pursuant to Sections 105, 363 and 365 of the Bankruptcy Code and Bankruptcy Rules 2002, 6004 and 6006, Approving the Rejection of Lease By and Between MSKP Orlando Square, LLC, as Landlord and Marianne USPR, Inc., as Tenant Regarding Store No. 452 [Docket No. 581; filed December 14, 2010]
- Status: The lease for store 452 was rejected by the Debtors effective as of November 30, 2010. Accordingly, the cure objection of MSKP Orlando Square, LLC is moot.
- FF. Objection of Developers Diversified Realty Corporation to Debtors' Corrected Notice of Executory Contracts and Unexpired Leases Which May Be Assumed and Assigned, Pursuant to Section 365 of the Bankruptcy Code, in Connection with the Sale of Substantially All of the Debtors' Assets and the Proposed Cure Amounts with Respect Thereto [Docket No. 248; filed October 19, 2010]
- Status: This objection to the proposed cure amount will go forward at the hearing. The parties are working to resolve this matter.
- GG. Letter from Tekmark Global Solutions, LLC in Support for Changing the Proposed Cure Amount [Docket No. 249; filed October 19, 2010]
- <u>Status</u>: This objection was resolved through an assumption and assignment agreement between Tekmark Global Solutions, LLC and New Ashley Steward LLC effective as of November 10, 2010.
- HH. Objection of Somerock University Mall Owner, LLC to Debtors' Corrected Notice of Executory Contracts and Unexpired Leases Which May Be Assumed and Assigned, Pursuant to Section 365 of the Bankruptcy Code, in Connection with the Sale of Substantially All of the

Debtors' Assets and the Proposed Cure Amounts with Respect Thereto [Docket No. 250; filed October 19, 2010]

- i. Order, Pursuant to Sections 105, 363 and 365 of the Bankruptcy Code and Bankruptcy Rules 2002, 6004 and 6006, Approving the Rejection of Lease By and Between Somerock University Mall Owner, LLC General Growth Properties, as Landlord and Large Apparel of Florida, Inc., as Tenant Regarding Store No. 376 [Docket No. 570; filed December 14, 2010]
- Status: The lease for store 376 was rejected by the Debtors as of November 30, 2010. Accordingly, the cure objection of Somerock University Mall Owner, LLC is moot.
- II. Objection of EMC Corporation to Proposed Cure Amount [Docket No. 251; filed October 19, 2010]
- <u>Status</u>: On March 18, 2011, this objection to the proposed cure amount was mutually resolved by the parties. Accordingly, no hearing is necessary unless the Court has any questions or concerns.
- JJ. Objection of General Growth Properties, Inc. to Debtors' Corrected Notice of Executory Contracts and Unexpired Leases Which May Be Assumed and Assigned, Pursuant to Section 365 of the Bankruptcy Code, in Connection with the Sale of Substantially All of the Debtors' Assets and the Proposed Cure Amounts with Respect Thereto [Docket No. 252; filed October 19, 2010]
- <u>Status</u>: This objection to the proposed cure amount will go forward at the hearing. The parties are working to resolve this matter.
- KK. Limited Objection (of 490 Fulton Owner, LLC) to Debtors' Proposed Sale of Substantially All of Their Assets Free and Clear of All Liens, Claims and Encumbrances and Cure Notice and Amount [Docket No. 253; filed October 19, 2010]
  - i. Withdrawal of Cure Objection (of 490 Fulton Owner, LLC) [Docket No. 1099; filed March 11, 2011]
- Status: On March 11, 2011, 490 Fulton Owner, LLC withdrew this objection to the proposed cure amount. Accordingly, no hearing is necessary unless the Court has any questions or concerns.
- LL. Objection of Jones Lang LaSalle Americas, Inc. to Debtors' Corrected Notice of Executory Contracts and Unexpired Leases Which May Be Assumed and Assigned, Pursuant to Section 365 of the Bankruptcy Code,

in Connection with the Sale of Substantially All of the Debtors' Assets and the Proposed Cure Amounts with Respect Thereto [Docket No. 254; filed October 19, 2010]

- i. Order, Pursuant to Sections 105, 363 and 365 of the Bankruptcy Code and Bankruptcy Rules 2002, 6004 and 6006, Approving the Rejection of Lease By and Between Macerich Valley View LP, as Landlord and Large Apparel of Texas, Inc., as Tenant Regarding Store No. 398 [Docket No. 571; filed December 14, 2010]
- Status: The lease for store 398 was rejected by the Debtors as of November 29, 2010. Accordingly, the cure objection of Jones Lang LaSalle Americas, Inc. is moot.
- MM. Objection of Weingarten Realty Investors to Debtors' Corrected Notice of Executory Contracts and Unexpired Leases Which May Be Assumed and Assigned, Pursuant to Section 365 of the Bankruptcy Code, in Connection with the Sale of Substantially All of the Debtors' Assets and the Proposed Cure Amounts with Respect Thereto [Docket No. 255; filed October 19, 2010]
- <u>Status</u>: This objection to the proposed cure amount will go forward at the hearing. The parties are working to resolve this matter.
- NN. Limited Objection of Town Centers, Ltd. to Debtors' Corrected Notice of Executory Contracts and Unexpired Leases Which May Be Assumed and Assigned, Pursuant to Section 365 of the Bankruptcy Code, in Connection with the Sale of Substantially All of the Debtors' Assets and the Proposed Cure Amounts with Respect Thereto [Docket No. 256; filed October 19, 2010]
  - i. Order, Pursuant to Sections 105, 363 and 365 of the Bankruptcy Code and Bankruptcy Rules 2002, 6004 and 6006, Approving the Rejection of Lease By and Between Town Centers Ltd., as Landlord and Large Apparel of Ohio, Inc., as Tenant Regarding Store No. 428 [Docket No. 578; filed December 14, 2010]
- Status: The lease for store 428 was rejected by the Debtors as of November 30, 2010. Accordingly, the cure objection for Town Centers Ltd. is moot.
- OO. Objection of Morris Prop Mgmt The Hub, LLC to Proposed Cure Amounts [Docket No. 258; filed October 19, 2010]
- <u>Status</u>: This objection to the proposed cure amount will go forward at the hearing. The parties are working to resolve this matter.

- PP. Objection of Thor Eastpoint Mall, LLC and Thor Gallery at Military Circle, LLC to Debtors' Proposed Cure Amount for Nonresidential Real Property Lease [Docket No. 259; filed October 19, 2010]
  - i. Objections of Thor Eastpoint Mall LLC and Thor Gallery at Military Circle LLC to Debtors' Proposed Cure Amount for Nonresidential Real Property Lease [Docket No. 418; filed October 25, 2010]

<u>Status</u>: This objection to the proposed cure amount will go forward at the hearing. The parties are working to resolve this matter.

- QQ. Limited Objection of CBL & Associates Management, Inc., as Managing Agent for Various Landlords, to Debtors' Corrected Notice of Executory Contracts and Unexpired Leases Which May Be Assumed and Assigned, Pursuant to Section 365 of the Bankruptcy Code, in Connection with the Sale of All of the Debtor's Assets and the Proposed Cure Amounts with Respect Thereto [Docket No. 261; filed October 19, 2010]
- <u>Status</u>: This objection to the proposed cure amount was mutually resolved by the parties. Accordingly, no hearing is necessary unless the Court has any questions or concerns.
- RR. Objection of Connecticut General Life Insurance Company to Proposed Assumption and Assignment of Its Agreements Pursuant to Corrected Notice of Executory Contracts and Unexpired Leases Which May Be Assumed and Assigned Pursuant to Section 365 of the Bankruptcy Code in Connection with the Sale of Substantially All of the Debtors' Assets and the Proposed Cure Amounts with Respect Thereto [Docket No. 264; filed October 19, 2010]

Status: This objection was resolved pursuant to the sale order.

- SS. Objection of CIBER, Inc. to Proposed Cure Amount [Docket No. 266; filed October 19, 2010]
  - i. Withdrawal of Cure Objection (of CIBER, Inc.) [Docket No. 1087; filed March 7, 2011]
- <u>Status</u>: On March 7, 2011, CIBER, Inc. withdrew this objection to the proposed cure amount. Accordingly, no hearing is necessary unless the Court has any questions or concerns.
- TT. Objection of Jubilee Christian Church International, Inc., Landlord, to Proposed Cure Amount Set Forth in *Corrected* Notice of Executory Contracts and Leases Which May Be Assumed [Docket No. 411; filed

## October 22, 2010]

- i. Withdrawal by Jubilee Christian Church International, Inc., of Cure Objection [Docket No. 1145; filed March 17, 2011]
- <u>Status</u>: On March 17, 2011, Jubilee Christian Church International, Inc. withdrew this objection to the proposed cure amount. Accordingly, no hearing is necessary unless the Court has any questions or concerns.
- UU. Objection of the Wholly-Owned Subsidiaries of Verizon Communications Inc. to Debtors' Proposed Cure Amount [Docket No. 414; filed October 22, 2010]
  - i. Order, Pursuant to Sections 105, 363 and 365 of the Bankruptcy Code and Bankruptcy Rules 2002, 6004 And 6006, (I) Approving the Assumption and Assignment of Executory Contract between Urban Brands, Inc. and Certain Wholly-Owned Subsidiaries of Verizon Communications, Inc. to New Ashley Stewart Inc. and (II) Resolving Cure Objection [Docket No. 1066; filed March 2, 2011]
- Status: On March 2, 2011, this objection to the proposed cure amount was mutually resolved by the parties in the assumption order. Accordingly, no hearing is necessary unless the Court has any questions or concerns.
- VV. Correspondence Received from Fair Haven Consulting Objecting to Cure Amount
- Status: This informal objection was resolved pursuant to an assumption and assignment agreement between Fair Haven Consulting and New Ashley Stewart effective as of November 10, 2010.
- Global Status: The objections of BLDG-ICS Onley, LLC and CP Associates LLC; RREEF Management, The Prudential Insurance Company of America and Watt Management Company; Lincoln Center; Inland US Management, LLC and Inland American Retain Management, LLC; Westfield, LLC; Developers Diversified Realty Corporation; General Growth Properties, Inc.; Weingarten Realty Investors; Morris Property MGMT The Hub, LLC; and Thor East Point Mall LLC and Thor Gallery at Military Circle LLC, listed at tabs O, S, W, Z, DD, FF, JJ, MM, OO, and PP, will go forward. The parties are working to resolve these objections. All other objections have been resolved or are moot.

## Related Documents:

- i. Notice of Executory Contracts and Unexpired Leases Which May Be Assumed and Assigned, Pursuant to Section 365 of the Bankruptcy Code, in Connection with the Sale of Substantially All of the Debtors' Assets and the Proposed Cure Amounts with Respect Thereto [Docket No. 100; filed September 29, 2010]
- Corrected Notice of Executory Contracts and Unexpired Leases ii. Which May Be Assumed and Assigned, Pursuant to Section 365 of the Bankruptcy Code, in Connection with the Sale of Substantially All of the Debtors' Assets and the Proposed Cure Amounts with Respect Thereto [Docket No. 104; filed September 30, 2010]
- iii. Order (A) Approving the Sale of Substantially All of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances and Interests; (B) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; (C) Establishing Assumption and Rejection Procedures for Certain Additional Executory Contracts and Unexpired Leases; (D) Approving Guidelines for Conducting Store Closing Sales; (E) Approving Agency Agreement; and (F) Extending the Deadline to Assume or Reject Unexpired Leases of Nonresidential Real Property Pursuant to 11 U.S.C. § 365(D)(4) [Docket No. 434, entered October 27, 2010]

Dated: March 25, 2011 Wilmington, Delaware Respectfully submitted,

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