

Matthew A. Feldman  
Paul V. Shalhoub  
Robin Spigel  
Debra C. McElligott  
WILLKIE FARR & GALLAGHER LLP  
787 Seventh Avenue  
New York, New York 10019  
Telephone: (212) 728-8000

*Counsel for the Debtors and  
Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
	:	
SquareTwo Financial Services	:	Case No. 17-10659 (JLG)
Corporation, <u>et al.</u> ,	:	
	:	(Jointly Administered)
	:	
<i>Debtors.</i>	:	
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Curtis Johnson and Jolie Johnson and All Similarly	:	
Situated Persons,	:	Adv. Proc. No. 17-01061 (JLG)
	:	
<i>Plaintiffs,</i>	:	
	:	
vs.	:	
	:	
CACH, LLC,	:	
	:	
<i>and</i>	:	
	:	
Merriman Investments, LLC,	:	
	:	
<i>and</i>	:	
	:	
SquareTwo Financial Services Corp.,	:	
	:	
<i>Defendants.</i>	:	
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**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR  
HEARING ON JUNE 2, 2017 AT 10:00 A.M. (EASTERN TIME)**

Time and Date of Hearing: June 2, 2017 at 10:00 a.m. (prevailing Eastern Time)

Location of Hearing: United States Bankruptcy Court, Southern District of New York,  
One Bowling Green, Room 601, New York, New York 10004

**I. MATTERS GOING FORWARD:**

1. Debtors' Motion Pursuant to Fed. R. Bankr. P. 9019 and 11 U.S.C. § 105(a) for Entry of Order Approving Settlement Agreement and Creditor Distribution Trust Agreement [Docket No. 239].

Related Documents:

Order Shortening Time and Scheduling Hearing on Debtors' Motion Pursuant to Fed. R. Bankr. P. 9019 and 11 U.S.C. § 105(a) for Entry of Order Approving Settlement Agreement and Creditor Distribution Trust Agreement [Docket No. 237].

Affidavit of Paul V. Shalhoub Pursuant to Local Bankruptcy Rule 9077-1(a) [Docket No. 238].

Notice of Filing of Form of Creditor Distribution Trust Agreement [Docket No. 253].

Limited Objection of the United States Trustee to the Debtors' Motion Pursuant to Fed. R. Bankr. P. 9019 and 11 U.S.C. § 105(a) for Entry of Order Approving Settlement Agreement and Creditor Distribution Trust Agreement [Docket No. 264].

**Status:** The above matter will be going forward at the Hearing.

2. Combined Hearing on (A) Confirmation of Joint Prepackaged Chapter 11 Plan for SquareTwo Financial Services Corporation and its Affiliated Debtors [Docket No. 20]; and (B) Approval of Disclosure Statement for Joint Prepackaged Chapter 11 Plan for SquareTwo Financial Services Corporation and its Affiliated Debtors [Docket No. 21].

Objections/Responses Received:

Limited Objection of Cigna Health and Life Insurance Company to (I) Notice of Assumption of Executory Contracts and Unexpired Leases and Cure in Connection with Joint Prepackaged Chapter 11 Plan for SquareTwo Financial Services Corporation and its Affiliated Debtors [D.I. 77]; (II) Joint Prepackaged Chapter 11 Plan for SquareTwo Financial Services Corporation and its Affiliated Debtors [D.I. 20]; and (III) Disclosure Statement for Joint Prepackaged Chapter

11 Plan for SquareTwo Financial Services Corporation and its Affiliated Debtors [D.I. 21] [Docket No. 104].

Objection of Julie Ann Meade, as the Administrator of the Colorado Consumer Credit Code, to Confirmation of Debtors' Plan [Docket No. 159].

Objection to the U.S. Securities and Exchange Commission to Confirmation of the Debtors' Joint Prepackaged Chapter 11 Plan [Docket No. 175].

Limited Objection of UMB Bank, N.A. to (I) Joint Prepackaged Chapter 11 Plan for SquareTwo Financial Services Corporation and its Affiliated Debtors [Dkt. No. 20] and (II) Disclosure Statement for Joint Prepackaged Chapter 11 Plan for SquareTwo Financial Services Corporation and its Affiliated Debtors [Dkt. No. 21] [Docket No. 178].

State of Oregon's Joinder in State of Colorado's Objection to Confirmation of Debtors' Plan [Docket No. 187].

Oracle's Limited Objection and Reservation of Rights Regarding (I) the Joint Prepackaged Chapter 11 Plan for SquareTwo Financial Services Corporation and its Affiliates and (II) the Potential Assumption, Assignment and Cure of its Agreements with Debtors [Docket No. 197].

Objection of the United States Trustee to Confirmation of Debtors' Joint Prepackaged Chapter 11 Plan [Docket No. 205].

U.S. Bank's Joinder in the Objection of the U.S. Securities and Exchange Commission to Confirmation of the Debtors' Joint Prepackaged Chapter 11 Plan and Reservation of Rights [Docket No. 207].

Related Documents:

Debtors' Motion for, among other things, Order (A) Approving Prepetition Solicitation Procedures, (B) Approving Adequacy of Disclosure Statement, and (C) Confirming Prepackaged Chapter 11 Plan [Docket No. 6].

Declaration of James Daloia of Prime Clerk LLC Regarding Solicitation of Votes and Tabulation of Ballots Cast on the Joint Prepackaged Chapter 11 Plan for SquareTwo Financial Services Corporation and its Affiliated Debtors [Docket No. 22].

Order: (I)(A) Scheduling Combined Hearing on Adequacy of Disclosure Statement and Confirmation of Prepackaged Plan, (B) Establishing Procedures for Objecting to Disclosure Statement and Prepackaged Plan, (C) Approving Form and Manner of Notice of Combined Hearing, (D) Waiving Requirement for Filing List of Creditors and List of Equity Holders, (E) Authorizing Debtors to File Consolidated List of Creditors, (F) Postponing or Waiving Section 341(a) Meeting, and (G) Granting Related Relief [Docket No. 66].

Notice of Assumption of Executory Contracts and Unexpired Leases and Cure Amounts in Connection with Joint Prepackaged Chapter 11 Plan for SquareTwo Financial Services Corporation and its Affiliated Debtors [Docket No. 77].

Notice of First Supplemental Schedule of Assumption of Executory Contracts and Unexpired Leases and Cure Amounts in Connection with Joint Prepackaged Chapter 11 Plan for SquareTwo Financial Services Corporation and its Affiliated Debtors [Docket No. 128].

Notice of Filing of Plan Supplement Relating to Joint Prepacked Chapter 11 Plan for SquareTwo Financial Services Corporation and its Affiliated Debtors [Docket No. 154].

Notice of Second Supplemental Schedule of Executory Contracts and Unexpired Leases to be Assumed or Assumed and Assigned and Cure Amounts in Connection with Joint Prepackaged Chapter 11 Plan for SquareTwo Financial Services Corporation and its Affiliated Debtors [Docket No. 162].

Notice of Third Supplemental Schedule of Executory Contracts and Unexpired Leases to be Assumed or Assumed and Assigned and Cure Amounts in Connection with Joint Prepackaged Chapter 11 Plan for SquareTwo Financial Services Corporation and its Affiliated Debtors [Docket No. 163].

Notice of Filing of Form of Proposed Order: (A) Approving Prepetition Solicitation Procedures, (B) Approving Adequacy of Disclosure Statement, and (C) Confirming Joint Prepackaged Chapter 11 Plan for SquareTwo Financial Services Corporation and its Affiliated Debtors [Docket No. 174].

Notice of Amendment to Schedule of Executory Contracts and Unexpired Leases to be Assumed or Assumed and Assigned and Cure Amounts in Connection with Joint Prepackaged Chapter 11 Plan for SquareTwo Financial Services Corporation and its Affiliated Debtors [Docket No. 190].

Notice of Second Amendment to Schedule of Executory Contracts and Unexpired Leases to be Assumed or Assumed and Assigned and Cure Amounts in Connection with Joint Prepackaged Chapter 11 Plan for SquareTwo Financial Services Corporation and its Affiliated Debtors [Docket No. 220].

Amended Order: (I)(A) Scheduling Combined Hearing on Adequacy of Disclosure Statement and Confirmation of Prepackaged Plan, (B) Establishing Procedures for Objecting to Disclosure Statement and Prepackaged Plan, (C) Approving Form and Manner of Notice of Combined Hearing, (D) Waiving Requirement for Filing List of Creditors and List of Equity Holders, (E) Authorizing Debtors to File Consolidated List of Creditors, (F) Postponing or Waiving Section 341(a) Meeting, and (G) Granting Related Relief [Docket No. 225].

Notice of Third Amendment to Schedule of Executory Contracts and Unexpired Leases to be Assumed or Assumed and Assigned and Cure Amounts in Connection with Joint Prepackaged Chapter 11 Plan for SquareTwo Financial Services Corporation and its Affiliated Debtors [Docket No. 240].

Debtors': (I) Memorandum of Law in Support of Order (A) Approving Prepetition Solicitation Procedures, (B) Approving Adequacy of Disclosure Statement, and (C) Confirming Joint Prepackaged Chapter 11 Plan for SquareTwo Financial Services Corporation and its Affiliated Debtors; and (II) Reply to Objections with Respect to Plan [Docket No. 262].

Declaration of J.B. Richardson, Jr. in Support of Order (A) Approving Prepetition Solicitation Procedures, (B) Approving Adequacy of Disclosure Statement, and (C) Confirming Joint Prepackaged Chapter 11 Plan for SquareTwo Financial Services Corporation and its Affiliated Debtors [Docket No. 259].

Declaration of Murat Tastan in Support of Order (A) Approving Prepetition Solicitation Procedures, (B) Approving Adequacy of Disclosure Statement, and (C) Confirming Joint Prepackaged Chapter 11 Plan for SquareTwo Financial Services Corporation and its Affiliated Debtors [Docket No. 260].

Declaration of Plan Investor in Support of Approval of Adequacy of Disclosure Statement and Confirmation of Joint Prepackaged Chapter 11 Plan for SquareTwo Financial Services Corporation and its Affiliated Debtors [Docket No. 261].

**Status:** The above matter will be going forward at the Hearing.

## **II. ADVERSARY PROCEEDING MATTER NOT GOING FORWARD:**

3. Motion to Dismiss the Complaint [Adv. Proc. Docket No. 5].

### **Related Documents:**

Order to Show Cause Setting Expedited Briefing Schedule and Hearing on Defendants CACH, LLC's and SquareTwo Financial Services Corporation's Motion to Dismiss the Complaint [Adv. Proc. Docket No. 3].

Affidavit of Paul V. Shalhoub Pursuant to Local Bankruptcy Rule 9077-1(a) [Adv. Proc. Docket No. 4].

Memorandum of Law in Support of Defendants CACH, LLC's and SquareTwo Financial Services Corporation's Motion to Dismiss the Complaint [Adv. Proc. Docket No. 6].

Declaration of Jessica T. Sutton in Support of Defendants CACH, LLC's and SquareTwo Financial Services Corporation's Motion to Dismiss the Complaint [Adv. Proc. Docket No. 7].

Notice of Dismissal [Adv. Proc. Docket No. 9].

**Status:** On May 30, 2017, Plaintiffs Curtis Johnson and Jolie Johnson filed the Notice of Dismissal of Adversary Proceeding [Adv. Proc. Docket No. 9]. The above matter will not be going forward at the Hearing.

Dated: May 31, 2017  
New York, New York

WILLKIE FARR & GALLAGHER LLP  
*Counsel for the Debtors and  
Debtors in Possession*

By: /s/ Paul V. Shalhoub \_\_\_\_\_  
Matthew A. Feldman  
Paul V. Shalhoub  
Robin Spigel  
Debra C. McElligott

787 Seventh Avenue  
New York, New York 10019  
Telephone: (212) 728-8000  
Facsimile: (212) 728-8111