

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

In re:)	
)	Chapter 11
Z GALLERIE, LLC, <i>et al.</i> , ¹)	
)	Case No. 19-10488 (LSS)
)	
Debtors.)	(Jointly Administered)
)	

**SECOND AMENDED NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON MAY 1, 2019 AT 10:00 A.M. (PREVAILING EASTERN TIME)²**

UNCONTESTED MATTERS WITH CERTIFICATION OF NO OBJECTION OR
CERTIFICATION OF COUNSEL:

1. Application of the Official Committee of Unsecured Creditors of Z Gallerie, LLC et. al., for Entry of an Order Authorizing the Employment and Retention of Cooley LLP as Lead Counsel Nunc Pro Tunc to March 20, 2019 [Docket No. 198; Filed 4/10/2019]

Related Documents:

- A. Certification of Counsel Regarding Application of the Official Committee of Unsecured Creditors of Z Gallerie, LLC, et al., for Entry of an Order Authorizing the Employment and Retention of Cooley LLP as Lead Counsel Nunc Pro Tunc to March 20, 2019 [Docket No. 230; Filed 4/25/2019]
- B. Proposed Order

Response Deadline: April 24, 2019 at 4:00 p.m.

Responses Received:

Status: The Order on this matter has been entered by the Court.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are Z Gallerie, LLC (3816) and Z Gallerie Holding Company, LLC (5949). The location of the Debtors’ service address is: 1855 West 139th Street, Gardena, CA 90249.

² Any party who wishes to attend telephonically is required to make arrangements through CourtCall by telephone (866-582-6878) or by facsimile (866-533-2946).

2. Application for Entry for an Order Authorizing and Approving the Employment of Province, Inc. as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of March 20, 2019 [Docket No. 199; Filed 4/10/2019]

Related Documents:

- A. Notice of Filing of Schedule 1 to the Declaration of Michael Atkinson in Support of the Application for Entry for an Order Authorizing and Approving the Employment of Province, Inc. as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of March 20, 2019 [Docket No. 214; Filed 4/17/2019]
- B. Supplemental Declaration of Michael Atkinson in Support of Application for Entry of an Order Authorizing and Approving the Employment of Province, Inc. as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of March 20, 2019 Docket No. 227; Filed 4/24/2019]
- C. Certificate of No Objection Regarding Application for Entry for an Order Authorizing and Approving the Employment of Province, Inc. as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of March 20, 2019 [Docket No. 231; Filed 4/25/2019]
- D. Proposed Order

Response Deadline: April 24, 2019 at 4:00 p.m.

Status: The Order on this matter has been entered by the Court.

CONTESTED MATTERS GOING FORWARD:

3. Disclosure Statement Relating to the Joint Plan of Reorganization of Z Gallerie, LLC and Z Gallerie Holding Company, LLC Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 105; Filed 3/22/2019]

Related Documents:

- A. Chapter 11 Plan of Reorganization [Docket No. 16; Filed 3/11/2019]
- B. Notice of Disclosure Statement Hearing [Docket No. 110; Filed 3/25/2019]

- C. First Amended Joint Plan of Reorganization of Z Gallerie, LLC and Z Gallerie Holding Company, LLC Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 238; Filed 4/30/2019]
- D. [BLACKLINED] First Amended Joint Plan of Reorganization of Z Gallerie, LLC and Z Gallerie Holding Company, LLC Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 239; Filed 4/30/2019]
- E. Disclosure Statement Relating to the First Amended Joint Plan of Reorganization of Z Gallerie, LLC and Z Gallerie Holding Company, LLC Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 240; Filed 4/30/2019]
- F. **[BLACKLINED] Disclosure Statement Relating to the First Amended Joint Plan of Reorganization of Z Gallerie, LLC and Z Gallerie Holding Company, LLC Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 246; Filed 4/30/2019]**

Response Deadline: April 24, 2019 at 4:00 p.m. Extended solely for the Official Committee of Unsecured Creditors, the Office of the United States Trustee, and certain landlords represented by Kelley Drye & Warren LLP, Ballard Spahr LLP, and Connolly Gallagher, LLP to April 29, 2019 at 4:00 p.m.

Responses Received:

- A. United States Trustee's Objection to the Debtors' Motion for Entry of an Order (I) Approving the Adequacy of the Disclosure Statement; (II) Approving the Solicitation and Notice Procedures with Respect to Confirmation of the Debtors' Joint Chapter 11 Plan; (III) Approving the Forms of Ballots and Notices in Connection Therewith; (IV) Scheduling Certain Dates with Respect Thereto; and (V) Granting Related Relief [Docket No. 234; Filed 4/29/2019]
- B. **Debtors' Response to U.S. Trustee's Objection to the Disclosure Statement Motion [Docket No. 245; Filed 4/30/2019]**

Status: This matter is going forward. The Debtors continue to work with counsel for the Official Committee of Unsecured Creditors, counsel for the Office of the United States Trustee, and certain landlords represented by Kelley Drye & Warren LLP, Ballard Spahr LLP, and Connolly Gallagher, LLP with respect to informal comments raised and formal objections filed, and anticipate filing revised pleadings prior to the hearing that resolve such comments.

4. Debtors' Motion for Entry of an Order (I) Approving the Adequacy of the Disclosure Statement; (II) Approving the Solicitation and Notice Procedures With Respect to Confirmation of the Debtors' Joint Chapter 11 Plan; (III) Approving Forms of Ballots and Notices in Connection Therewith; (IV) Scheduling Certain Dates With Respect Thereto; and (V) Granting Related Relief [Docket No. 106; Filed 3/22/2019]

Related Documents:

- A. Notice of Debtors' Motion for Entry of an Order (I) Approving the Adequacy of the Disclosure Statement; (II) Approving the Solicitation and Notice Procedures With Respect to Confirmation of the Debtors' Joint Chapter 11 Plan; (III) Approving Forms of Ballots and Notices in Connection Therewith; (IV) Scheduling Certain Dates With Respect Thereto; and (V) Granting Related Relief [Docket No. 111; Filed 3/25/2019]
- B. Notice of Proposed Order Regarding the Debtors Motion for Entry of an Order (I) Approving the Adequacy of the Disclosure Statement; (II) Approving the Solicitation and Notice Procedures With Respect to Confirmation of the Debtors' Joint Chapter 11 Plan; (III) Approving Forms of Ballots and Notices in Connection Therewith; (IV) Scheduling Certain Dates With Respect Thereto; and (V) Granting Related Relief [Docket No. 242; Filed 4/30/2019]

Response Deadline: April 24, 2019 at 4:00 p.m. Extended solely for the Official Committee of Unsecured Creditors, the Office of the United States Trustee, and certain landlords represented by Kelley Drye & Warren LLP, Ballard Spahr LLP, and Connolly Gallagher, LLP to April 29, 2019 at 4:00 p.m.

Responses Received:

- A. United States Trustee's Objection to the Debtors' Motion for Entry of an Order (I) Approving the Adequacy of the Disclosure Statement; (II) Approving the Solicitation and Notice Procedures with Respect to Confirmation of the Debtors' Joint Chapter 11 Plan; (III) Approving the Forms of Ballots and Notices in Connection Therewith; (IV) Scheduling Certain Dates with Respect Thereto; and (V) Granting Related Relief [Docket No. 234; Filed 4/29/2019]
- B. Statement of the Official Committee of Unsecured Creditors to Debtors' Motion for Entry of an Order (I) Approving the Adequacy of the Disclosure Statement; (II) Approving the**

Solicitation and Notice Procedures with Respect to Confirmation of the Debtors' Joint Chapter 11 Plan; (III) Approving Forms of Ballots and Notices in Connection Therewith; (IV) Scheduling Certain Dates with Respect Thereto; and (V) Granting Related Relief [Docket No. 244; Filed 4/30/2019]

Status: This matter is going forward. The Debtors continue to work with counsel for the Official Committee of Unsecured Creditors, counsel for the Office of the United States Trustee, and certain landlords represented by Kelley Drye & Warren LLP, Ballard Spahr LLP, and Connolly Gallagher, LLP with respect to informal comments raised and formal objections filed, and anticipate filing revised pleadings prior to the hearing that resolve such comments.

Dated: April 30, 2019
Wilmington, Delaware

/s/ Domenic E. Pacitti

Domenic E. Pacitti (DE Bar No. 3989)
Michael W. Yurkewicz (DE Bar No. 4165)
KLEHR HARRISON HARVEY BRANZBURG LLP
919 N. Market Street, Suite 1000
Wilmington, Delaware 19801
Telephone: (302) 426-1189
Facsimile: (302) 426-9193

-and-

Joshua A. Sussberg, P.C. (admitted *pro hac vice*)
KIRKLAND & ELLIS LLP
KIRKLAND & ELLIS INTERNATIONAL LLP
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-4900

-and-

Justin R. Bernbrock (admitted *pro hac vice*)
KIRKLAND & ELLIS LLP
KIRKLAND & ELLIS INTERNATIONAL LLP
300 North LaSalle
Chicago, Illinois 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200

Co-Counsel for the Debtors and Debtors in Possession