IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

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In re:

Z GALLERIE, LLC, et al.,¹

Debtors.

Chapter 11

Case No. 19-10488 (LSS)

(Jointly Administered)

Related to Docket No. 105

NOTICE OF DISCLOSURE STATEMENT HEARING

PLEASE TAKE NOTICE that on March 22, 2019, the above-captioned debtors (collectively, the "<u>Debtors</u>") filed the *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] (as it may be amended, modified, or revised, the "<u>Disclosure Statement</u>") pursuant to section 1125 of title 11 of the United States Code (the "<u>Bankruptcy Code</u>").

PLEASE TAKE FURTHER NOTICE that a hearing (the "<u>Disclosure Statement</u> <u>Hearing</u>") will be held before the before the Honorable Laurie Selber Silverstein, United States Bankruptcy Judge for the District of Delaware, (the "<u>Bankruptcy Court</u>"), 824 N. Market Street, 6th Floor, Courtroom 2, Wilmington, Delaware 19801 on **May 1, 2019 at 10:00 a.m.** (**prevailing Eastern Time**), to consider the entry of an order, among other things, finding that the Disclosure Statement contains "adequate information" within the meaning of section 1125 of the Bankruptcy Code, approving the Disclosure Statement, and establishing procedures for the solicitation and tabulation of votes to accept or reject the Plan.

PLEASE TAKE FURTHER NOTICE that copies of the Disclosure Statement and the Plan are available for review on the website of the Debtors' notice and claims agent, Stretto, at <u>http://cases.stretto.com/zgallerie</u>. Further information and copies of the Disclosure Statement and Plan are available upon request by contacting Stretto by telephone at (855) 276-9008 or emailing <u>ZGallerieInquiries@stretto.com</u> or from the Bankruptcy Court's website: <u>https://ecf.deb.uscourts.gov</u>, referencing Case No. 19-10488 (LSS). The Disclosure Statement and Plan are on file with the Clerk of the Bankruptcy Court and may be examined by interested parties at the Office of the Clerk, located at the Bankruptcy Court, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801 during regular business hours.

PLEASE TAKE FURTHER NOTICE that responses and objections, if any, to the adequacy of the Disclosure Statement or any other relief sought by the Debtors in connection with the approval of the Disclosure Statement, must: (a) be in writing; (b) state the name and

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.

address of the objecting or responding party and the nature of the claim or interest of such party; (c) state with particularity the basis and nature of any objection or response and include, where appropriate, proposed language to be inserted in the Disclosure Statement to resolve any such objection or response; and (d) be filed, together with proof of service, with the Bankruptcy Court such that the Bankruptcy Court actually receives the responses and objections (and the Court receives the proof of service) on or before April 24, 2019 at 4:00 p.m. (prevailing Eastern Time) and be promptly served upon the following parties: (i) the Debtors, c/o Z Gallerie, LLC, 1855 West 139th Street, Gardena, CA 90249 (Attn: Mark Weinsten); (ii) counsel to the Debtors, Kirkland & Ellis LLP, 601 Lexington Avenue, New York, New York 10022 (Attn: Joshua A. Sussberg, Esq. and Justin Bernbrock, Esq.) and Klehr Harrison Harvey Branzburg LLP (Attn: Domenic E. Pacitti); (iii) Buchanan Ingersoll & Rooney, PC, 919 N. Market Street, Wilmington, DE 19801 (Attn: Mary F. Caloway); (iv) counsel to the official committee of unsecured creditors, Cooley LLP, 1114 Avenue of the Americas, New York, NY 10036 (Attn: Seth Van Aalten and Michael Klein) and Whiteford Taylor & Preston LLC, The Renaissance Centre, 405 North King Street, Suite 500, Wilmington, De 19801 (Attn: Christopher M. Samis and L. Katherine Good); and (v) the U.S. Trustee, 844 King Street, Suite 2007, Lockbox 35, Wilmington, Delaware 19801 (Attn: Jaclyn Weissgerber, Esq.).

PLEASE TAKE FURTHER NOTICE THAT IF ANY OBJECTION TO THE DISCLOSURE STATEMENT OR RELATED RELIEF IS NOT FILED AND SERVED AS PRESCRIBED HEREIN, THE OBJECTING PARTY MAY BE BARRED FROM OBJECTING TO THE ADEQUACY OF THE DISCLOSURE STATEMENT AND RELATED RELIEF AND MAY NOT BE HEARD AT THE HEARING.

PLEASE TAKE FURTHER NOTICE THAT THIS NOTICE IS NOT A SOLICITATION OF VOTES TO ACCEPT OR REJECT THE PLAN. VOTES ON THE PLAN MAY NOT BE SOLICITED UNLESS AND UNTIL THE PROPOSED DISCLOSURE STATEMENT IS APPROVED BY AN ORDER OF THE BANKRUPTCY COURT.

PLEASE TAKE FURTHER NOTICE that the Disclosure Statement Hearing may be continued from time to time without further notice other than an announcement of the adjourned date or dates at the Hearing or at a later hearing.

[*Remainder of page intentionally left blank*]

Dated: March 25, 2019 Wilmington, Delaware /s/ Domenic E. Pacitti

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

-and-

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Proposed Co-Counsel for the Debtors and Debtors in Possession