

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

F21 OPCO, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10469 (MFW)

(Jointly Administered)

Hearing Date: May 5, 2025 at 10:30 a.m. (ET)

Objection Deadline: April 28, 2025 at 4:00 p.m. (ET)

**NOTICE OF HEARING TO CONSIDER
ADEQUACY OF DISCLOSURE STATEMENT**

PLEASE TAKE NOTICE that on March 28, 2025, the debtors and debtors in possession in the above-captioned cases (collectively, the “**Debtors**”) filed with the United States Bankruptcy Court for the District of Delaware (the “**Court**”) the *Disclosure Statement for Debtors’ Joint Plan Pursuant to Chapter 11 of the Bankruptcy Code* (as may be subsequently amended, modified or supplemented, the “**Disclosure Statement**”) [Docket No. 124].

PLEASE TAKE FURTHER NOTICE that the Debtors intend to present the Disclosure Statement, and any amendments, supplements, changes or modifications thereto, for approval at a hearing before the Honorable Mary F. Walrath on **May 5, 2025 at 10:30 a.m. (ET)** convened at the Bankruptcy Court, 824 North Market Street, 5th Floor, Courtroom No. 4, Wilmington, Delaware 19801 (the “**Disclosure Statement Hearing**”). The Disclosure Statement may be amended at any time prior to or at the Disclosure Statement Hearing, and the Disclosure Statement Hearing may be adjourned from time to time without further notice, except for the announcement of the adjourned date(s) through the agenda for the Disclosure Statement Hearing and/or at the Disclosure Statement Hearing or any continued hearing(s).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the approval of the Disclosure Statement must be in writing and must: (a) state the name and address of the objector or entity proposing a modification to the Disclosure Statement and the amount (if applicable) of its claim or nature of its interest in the Debtors’ chapter 11 cases; (b) specify the basis and nature of any objection and set forth the proposed modification to the Disclosure Statement, together with suggested language; (c) be filed with the Clerk of the Bankruptcy Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801 together with proof of service, **on or before**

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: F21 OpCo, LLC (8773); F21 Puerto Rico, LLC (5906); and F21 GiftCo Management, LLC (6412). The Debtors’ address for purposes of service in these Chapter 11 Cases is 110 East 9th Street, Suite A500, Los Angeles, CA 90079.



April 28, 2025 at 4:00 p.m. (ET) (the “Objection Deadline”); and (d) be served upon the following parties so as to be received on or before the Objection Deadline: (i) proposed counsel to the Debtors, Young Conaway Stargatt & Taylor, LLP, 1000 North King Street, Wilmington, DE 19801, Attn.: Andrew L. Magaziner, Esq. (amagaziner@ycst.com) and S. Alexander Faris, Esq. (afaris@ycst.com); (ii) the Office of the U.S. Trustee for the District of Delaware, 844 King Street, Suite 2207, Wilmington, Delaware, 19801, Attn.: Jane M. Leamy, Esq., (jane.m.leafy@usdoj.gov); (iii) counsel to Wells Fargo Bank, N.A. in its capacity as Prepetition ABL Administrative Agent, (a) Otterbourg, P.C., 230 Park Avenue, New York, NY 10169, Attn.: Chad Simon, Esq. (csimon@otterbourg.com) and Daniel Fiorillo (dfiorillo@otterbourg.com), and (b) Richards, Layton, and Finger, P.A., One Rodney Square, 920 North King Street, Wilmington, Delaware 19801, Attn.: John H. Knight, Esq. (knight@rlf.com); (iv) counsel to Pathlight Capital LP in its capacity as Prepetition Term Loan Agent, (a) Riemer & Braunstein LLP, Times Square Tower, Suite 2506, Seven Times Square, New York, NY 10036, Attn.: Steven E. Fox, Esq. (SFox@riemerlaw.com) and 100 Cambridge Street, 22nd Floor, Boston, Massachusetts 02114, Attn: Paul Bekker, Esq. (pbekker@riemerlaw.com), and (b) Ashby & Geddes, P.A., 500 Delaware Avenue, 8th Floor, Wilmington, Delaware, 19801, Attn.: Gregory A. Taylor, Esq. (GTaylor@ashbygeddes.com); (v) counsel to Simon Blackjack Consolidated Holdings, LLC in its capacity as Prepetition Subordinated Loan Agent, (a) Choate Hall & Stewart LLP, Two International Place, Boston, MA 02110, Attn.: M. Hampton Foushee, Esq. (hfoushee@choate.com) and Alexandra Thomas, Esq. (athomas@choate.com), and (b) Pashman Stein Walder Hayden, P.C., 824 North Market Street, Suite 800, Wilmington, Delaware 19801, Attn.: Joseph C. Barsalona, Esq. (jbarsalona@pashmanstein.com); and (vi) proposed counsel to the Committee, (a) McDermott Will & Emery, One Vanderbilt Avenue, New York, NY 10017, Attn.: Darren Azman, Esq. (dazman@mwe.com) and Kristin K. Going, Esq. (kgoing@mwe.com) and (b) Cole Schotz P.C., 500 Delaware Avenue, Suite 600, Wilmington, DE 19801, Attn.: Justin R. Alberto, Esq. (jalberto@coleschotz.com) and Stacy L. Newman, Esq. (snewman@coleschotz.com).

PLEASE TAKE FURTHER NOTICE that copies of the Disclosure Statement may be obtained by visiting the website maintained by the Debtors’ notice, claims, and solicitation agent in the chapter 11 cases, <https://veritaglobal.net/forever21>

If you have questions regarding this notice, please call 866-480-0830 (U.S./Canada), or +1 781-575-20240 (International), or submit an inquiry via www.veritaglobal.net/Forever21/inquiry

PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS OR RESPONSES TO THE DISCLOSURE STATEMENT ARE TIMELY FILED, SERVED, AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN CONNECTION WITH DISCLOSURE STATEMENT WITHOUT FURTHER NOTICE OR HEARING.

[signature page follows]

Dated: March 28, 2025

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ S. Alexander Faris

Andrew L. Magaziner (No. 5426)

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Proposed Counsel to the Debtors and Debtors in Possession