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

In re: Chapter 11

F21 OPCO, LLC, et al., 1 Case No. 25-10469 (MFW)

> Debtors. (Jointly Administered)

# NOTICE OF AGENDA OF MATTERS SCHEDULED **FOR HEARING ON MAY 28, 2025 AT 3:00 P.M (ET)**

THIS HEARING WILL BE CONDUCTED REMOTELY VIA ZOOM. PARTIES AND WITNESS ARE PERMITTED, BUT NOT REQUIRED, TO APPEAR IN PERSON. THE COURT HAS NO PREFERENCE.

TO ATTEND THE HEARING REMOTELY, PLEASE REGISTER USING THE ECOURT APPEARANCES TOOL ON THE COURT'S WEBSITE AT WWW.DEB.USCOURTS.GOV OR CLICK THE BELOW LINK: HTTPS://ECF.DEB.USCOURTS.GOV/CGI-BIN/NYSBAPPEARANCES.PL

REGISTRATION IS REQUIRED BY 4:00 P.M. (ET) THE LAST BUSINESS DAY BEFORE THE HEARING UNLESS OTHERWISE NOTICED USING THE ECOURTAPPEARANCES TOOL AVAILABLE ON THE COURT'S WEBSITE.

AFTER REGISTERING YOUR APPEARANCE, YOU WILL RECEIVE A CONFIRMATION EMAIL. ZOOM INFORMATION WILL BE SENT OUT PRIOR TO THE HEARING.

## ADJOURNED/RESOLVED MATTERS

1. Application of the Official Committee of Unsecured Creditors of F21 OpCo, LLC, et al., to Retain and Employ McDermott Will & Emery LLP as Counsel, Effective March 27, 2025 [Docket No. 268; 4/25/25]



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.

#### Related Documents:

- A. Certification of No Objection Regarding Application of the Official Committee of Unsecured Creditors of F21 OpCo, LLC, *et al.*, to Retain and Employ McDermott Will & Emery LLP as Counsel, Effective March 27, 2025 [Docket No. 337; 5/12/25]
- B. Order Authorizing the Official Committee of Unsecured Creditors of F21 OpCo, LLC, *et al.*, to Retain and Employ McDermott Will & Emery LLP as Counsel, Effective March 27, 2025 [Docket No. 340; 5/13/25]

Response Deadline: May 9, 2025 at 4:00 p.m. (ET)

Objections/Informal Responses: None

Status: An order has been entered by the Court. No hearing is required.

2. Application for an Order Pursuant to 11 U.S.C. §§ 328(a) and 1103 Authorizing and Approving the Retention and Employment of Cole Schotz P.C. as Delaware Co-Counsel to the Official Committee of Unsecured Creditors Effective as of March 27, 2025 [Docket No. 269; 4/25/25]

#### **Related Documents:**

- A. Certification of Counsel Regarding Application for an Order Pursuant to 11 U.S.C. §§ 328(a) and 1103 Authorizing and Approving the Retention and Employment of Cole Schotz P.C. as Delaware Co-Counsel to the Official Committee of Unsecured Creditors Effective as of March 27, 2025 [Docket No. 338; 5/12/25]
- B. Order Pursuant to 11 U.S.C. §§ 328(a) and 1103 Authorizing and Approving the Retention and Employment of Cole Schotz P.C. as Delaware Co-Counsel to the Official Committee of Unsecured Creditors Effective as of March 27, 2025 [Docket No. 341; 5/13/25]

Response Deadline: May 9, 2025 at 4:00 p.m. (ET)

## Objections/Informal Responses:

C. Informal response from the U.S. Trustee

Status: An order has been entered by the Court. No hearing is required.

3. Application for Entry of an Order Authorizing and Approving the Employment of Province, LLC as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of March 28, 2025 [Docket No. 270; 4/25/25]

#### **Related Documents:**

- A. Certification of No Objection Regarding Application for Entry of an Order Authorizing and Approving the Employment of Province, LLC as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of March 28, 2025 [Docket No. 339; 5/12/25]
- B. Order Authorizing and Approving the Employment of Province, LLC as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of March 28, 2025 [Docket No. 342; 5/13/25]

Response Deadline: May 9, 2025 at 4:00 p.m. (ET)

Objections/Informal Responses: None

Status: An order has been entered by the Court. No hearing is required.

4. Motion of Christina Haynes for an Order Granting Relief from the Automatic Stay Pursuant to Section 362(d) of the Bankruptcy Code [Docket No. 271; 4/25/25]

## Related Documents:

- A. Certification of Counsel Submitting Revised Proposed Order Regarding Motion of Christina Haynes for an Order Granting Relief from the Automatic Stay Pursuant to Section 362(d) of the Bankruptcy Code [Docket No. 307; 5/9/25]
- B. Order Granting Motion of Christina Haynes for an Order Granting Relief from the Automatic Stay Pursuant to Section 362(d) of the Bankruptcy Code [Docket No. 319; 5/9/25]

Response Deadline: May 5, 2025 at 4:00 p.m. (ET); Extended for the

Debtors to May 16, 2025 at 4:00 p.m. (ET)

## Objections/Informal Responses:

C. Informal response from the Debtors

Status: An order has been entered by the Court. No hearing is required.

5. Motion of Lidia Munoz for Relief from the Automatic Stay Pursuant to Section 362(d) of the Bankruptcy Code [Docket No. 273; 4/25/25]

#### **Related Documents:**

- A. Certification of Counsel of Proposed Order Regarding Motion of Lidia Munoz for Relief from the Automatic Stay Pursuant to Section 362(d) of the Bankruptcy Code [Docket No. 346; 5/14/25]
- B. Order Granting Motion of Lidia Munoz for Relief from the Automatic Stay Pursuant to Section 362(d) of the Bankruptcy Code [Docket No. 348; 5/14/25]

Response Deadline: May 9, 2025 at 4:00 p.m. (ET)

# Objections/Informal Responses:

C. Informal response from the Debtors

<u>Status</u>: An order has been entered by the Court. No hearing is required.

6. Debtors' Motion for Entry of an Order Authorizing (I) Rejection of License Agreement and (II) Granting Related Relief [Docket No. 294; 5/2/25]

# **Related Documents:**

- A. Certificate of No Objection [Docket No. 356; 5/19/25]
- B. Order Authorizing (I) Rejection of License Agreement and (II) Granting Related Relief [Docket No. 362; 5/20/25]

Response Deadline: May 16, 2025 at 4:00 p.m. (ET)

Objections/Informal Responses: None

Status: An order has been entered by the Court. No hearing is required.

7. Motion of Tewanna Marsh for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) of the Bankruptcy Code [Docket No. 309; 5/9/25]

Related Documents: None

Response Deadline: May 23, 2025 at 4:00 p.m. (ET); Extended to May

30, 2025 at 4:00 p.m. (ET) for the Debtors

## Objections/Informal Responses:

A. Informal response from the Debtors

Status:

The parties have resolved this matter in principle and are finalizing documentation of their agreement. A consensual form of order will be submitted under certification of counsel. This matter is adjourned with consent of the parties.

## **MATTERS WITH CERTIFICATION**

8. Debtors' First (Substantive) Omnibus Objection to Claims (Reclassified Claims) [Docket No. 286; 4/28/25]

## Related Documents:

- A. Notice of Filing of Corrected Schedule 1 to Debtors' First (Substantive) Omnibus Objection to Claims (Reclassified Claims) [Docket No. 298; 5/5/25]
- B. Certification of Counsel Regarding Revised Proposed Order Sustaining the Debtors' First (Substantive) Omnibus Objection to Claims (Reclassified Claims) [Docket No. 379; 5/21/25]

Response Deadline: May 12, 2025 at 4:00 p.m. (ET); extended for certain parties

## Objections/Informal Responses:

- C. Creditors Hangzhou Qidi Fashion Apparel Co. Ltd and Shanghai Toex Industrial Trading, Ltd.'s Omnibus Response to the Debtors' First Omnibus Objection to Claims [Docket No. 354; 5/19/25]
- D. Informal response from Velocity Apparelz for Ready-made Garments E.S.C.

Status: The Debtors have adjourned this matter solely as it relates to the claims filed by Hangzhou Qidi Fashion Apparel Co. Ltd and Shanghai Toex Industrial Trading, Ltd to the next omnibus hearing. Additionally, Velicoty Apparelz for Ready-made Garments E.S.C. has withdrawn the claim that was subject of this claim objection, as it was superseded by a later-filed claim. A revised form of order sustaining the claim objection as to the balance of the claims subject to the claim objection has been submitted under certification of counsel. No hearing is required unless the Court has questions.

[Signature Page Follows]

Dated: May 23, 2025 YOUNG CONAWAY STARGATT & TAYLOR, LLP

## /s/ Kristin L. McElroy

Andrew L. Magaziner (No. 5426) Robert F. Poppiti, Jr. (No. 5052) Ashley E. Jacobs (No. 5635) S. Alexander Faris (No. 6278) Kristin L. McElroy (No. 6871) Andrew M. Lee (No. 7078) Sarah Gawrysiak (No. 7403) Rodney Square 1000 North King Street Wilmington, DE 19801 Telephone: (302) 571-6600 Email: amagaziner@ycst.com rpoppiti@ycst.com ajacobs@ycst.com afaris@ycst.com kmcelroy@ycst.com alee@ycst.com sgawrysiak@ycst.com

Counsel to the Debtors and Debtors in Possession