

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

In re:

F21 OPCO, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10469 (MFW)

(Jointly Administered)

**NOTICE OF AMENDED<sup>2</sup> AGENDA OF MATTERS SCHEDULED  
FOR HEARING ON JUNE 24, 2025 AT 11:30 A.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](http://WWW.DEB.USCOURTS.GOV) OR CLICK THE BELOW LINK:  
[HTTPS://ECF.DEB.USCOURTS.GOV/CGI-BIN/NYSBAPPEARANCES.PL](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.**

**RESOLVED MATTER**

1. Anie Denaud, Individually and as Parent of Minor A.D.'s Motion for Relief from the Automatic Stay [Docket No. 386; 5/27/25]

<sup>1</sup> 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.

<sup>2</sup> All amendments appear in bold.



Related Documents:

- A. Certification of Counsel Regarding Revised Proposed Order Granting Anie Denaud's Motion for Relief from the Automatic Stay [Docket No. 460; 6/17/25]
- B. Order Granting Anie Denaud, Individually and as Parent of Minor A.D.'s Motion for Relief from the Automatic Stay [Docket No. 461; 6/17/25]

Response Deadline: June 12, 2025 at 4:00 p.m. (ET)

Objections/Informal Responses:

- B. Informal response from the Debtors

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

**MATTERS GOING FORWARD**

- 2. 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]
- C. Certification of Counsel Regarding Further Revised Proposed Order Sustaining the Debtors' First (Substantive) Omnibus Objection to Claims (Reclassified Claims) [[Docket No. 403](#); 5/29/25]
- D. Order Sustaining the Debtors' First (Substantive) Omnibus Objection to Claims (Reclassified Claims) [[Docket No. 405](#); 5/30/25]
- E. Notice of (I) Proposed Supplemental Order Sustaining the Debtors' First (Substantive) Omnibus Objection to Claims (Reclassified Claims); (II) Proposed Supplemental Order Sustaining the Debtors' Second (Substantive) Omnibus Objection to Claims (Reclassified Claims); and (III) Supplemental Declaration of Michael Brown in Support of Debtors' First and Second (Substantive) Omnibus Objection to Claims (Reclassified Claims) [[Docket No. 450](#); 6/13/25]

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

Objections/Informal Responses:

- F. 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]
- G. Informal response from Velocity Apparelz for Ready-made Garments E.S.C.
- H. Informal response from Rand Accessories.

Status: Item (F) has been resolved on the terms set forth in the proposed supplemental order filed at Docket No. 450 and listed as Item (E) above. Item (G) has been withdrawn. The objection with respect to Rand Accessories, listed as Item (H) above, will be adjourned to a date to be determined. The Debtors will present the supplemental orders, filed at Docket No. 450 and listed as Item (E) above, at the hearing.

- 3. Debtors' Second (Substantive) Omnibus Objection to Claims (Reclassified Claims) [[Docket No. 374](#); 5/21/25]

Related Documents:

- A. Certification of Counsel Regarding Revised Proposed Order Sustaining the Debtors' Second (Substantive) Omnibus Objection to Claims (Reclassified Claims) [[Docket No. 421](#); 6/10/25]
- B. Order Sustaining the Debtors' Second (Substantive) Omnibus Objection to Claims (Reclassified Claims) [[Docket No. 435](#); 6/12/25]
- C. Notice of (I) Proposed Supplemental Order Sustaining the Debtors' First (Substantive) Omnibus Objection to Claims (Reclassified Claims); (II) Proposed Supplemental Order Sustaining the Debtors' Second (Substantive) Omnibus Objection to Claims (Reclassified Claims); and (III) Supplemental Declaration of Michael Brown in Support of Debtors' First and Second (Substantive) Omnibus Objection to Claims (Reclassified Claims) [[Docket No. 450](#); 6/13/25]

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

Objections/Informal Responses:

- D. Informal response from Grand Group HK

- E. Informal response from CAB Assignee Ningbo Roia Import Export Co Ltd
- F. Informal response from CAB Assignee of Shanghai Fei Chuan Imp Exp Corp Ltd
- G. Informal response from CAB Assignee of Zhejiang Jiaxin Silk Corp Ltd

Status: All informal responses, listed as Items (D) through (G), have been resolved on the terms set forth in the proposed supplemental order filed at Docket No. 450 and listed as Item (C) above. This matter is going forward.

- 4. Debtors' Seventh (7th) Omnibus Motion for Entry of an Order Authorizing (I) Rejection of (A) Certain Unexpired Leases of Nonresidential Real Property and (B) Certain Executory Contracts, Effective as of the Rejection Date; (II) Abandonment of Any Remaining Personal Property Located at the Leased Premises, Effective as of the Rejection Date; and (III) Granting Related Relief [[Docket No. 404](#); 5/29/25]

Related Documents:

- A. Certification of Counsel Regarding Revised Proposed Seventh (7<sup>th</sup>) Omnibus Order Authorizing (I) Rejection of (A) Certain Unexpired Leases of Nonresidential Real Property and (B) Certain Executory Contracts, Effective as of the Rejection Date; (II) Abandonment of Any Remaining Personal Property Located at the Leased Premises, Effective as of the Rejection Date; and (III) Granting Related Relief [Docket No. TBD; TBD]

Response Deadline: June 12, 2025 at 4:00 p.m. (ET)

Objections/Informal Responses:

- B. Informal response from Maersk Warehousing & Distribution Services USA LLC

Status: The Debtors are finalizing the terms of a stipulation with Maersk Warehousing & Distribution Services USA LLC that will resolve its informal response. The Debtors anticipate filing a revised form of order, which will seek approval of the stipulation with Maersk, under certification of counsel in advance of the hearing.

- 5. Debtors' Motion for Entry of an Order Authorizing the Debtors to Assume and Assign a Certain Unexpired Lease of Nonresidential Real Property to Catalyst Lease SPV, LLC, Effective as of June 1, 2025 [[Docket No. 447](#); 6/13/25]

Related Documents:

- A. Order Shortening the Notice Period for Debtors' Motion for Entry of an Order Authorizing the Debtors to Assume and Assign a Certain Unexpired Lease of Nonresidential Real Property to Catalyst Lease SPV, LLC, Effective as of June 1, 2025 [[Docket No. 453](#); 6/13/25]

Response Deadline: June 20, 2025 at 4:00 p.m. (ET)

Objections/Informal Responses: **Informal comments from counsel for Brookfield and Catalyst.**

Status: **The Debtors have resolved the informal comments received from Brookfield and Catalyst and anticipate submitting a revised form of order granting the motion under certification of counsel in advance of the hearing.** This matter is going forward.

6. Confirmation of Debtors' Amended Joint Plan Pursuant to Chapter 11 of the Bankruptcy Code

Related Documents:

- A. Notice of Filing of Plan Support Agreement [[Docket No. 17](#); 3/17/25]
- B. Order (I) Approving (A) the Adequacy of the Disclosure Statement; (B) the Solicitation and Notice Procedures with Respect to the Confirmation of the Debtors' Joint Chapter 11 Plan; and (C) the Forms of Ballots and Notices in Connection Therewith; (II) Scheduling Certain Dates with Respect Thereto; and (III) Granting Related Relief [[Docket No. 335](#); 5/12/25]
- C. Disclosure Statement for Debtors' Joint Plan Pursuant to Chapter 11 of the Bankruptcy Code [[Docket No. 344](#); 5/14/25]
- D. Notice of Hearing to Consider Confirmation of the Debtors' Chapter 11 Plan and Related Voting and Objection Deadlines [[Docket No. 345](#); 5/14/25]
- E. Affidavit of Publication of Notice Confirmation of the Debtors' Chapter 11 Plan and Related Voting and Objection Deadlines in The New York Times and The Los Angeles Times; Notice of Publication in South China Morning Post [[Docket No. 412](#); 6/3/25]
- F. Notice of Filing of Plan Supplement for the Debtors' Amended Joint Plan Pursuant to Chapter 11 of the Bankruptcy Code [[Docket No. 420](#); 6/9/25]
- G. Notice of Filing of Debtors' Amended Joint Plan Pursuant to Chapter 11 of the Bankruptcy Code, Incorporating Global Settlement Reached Between Debtors, the Committee, the SPARC Parties and the ABL Agent [[Docket No. 426](#); 6/10/25]

- H. Notice of Filing of Amendment to Plan Supplement for the Debtors' Amended Joint Plan Pursuant to Chapter 11 of the Bankruptcy Code [[Docket No. 427](#); 6/10/25]
- I. Notice of Filing of Fully Compiled Plan Supplement for the Debtors' Amended Joint Plan Pursuant to Chapter 11 of the Bankruptcy Code [[Docket No. 452](#); 6/13/25]
- J. Notice of Filing of Proposed Findings of Fact, Conclusions of Law, and Order Approving the Debtors' Amended Joint Plan Pursuant to Chapter 11 of the Bankruptcy Code [[Docket No. 458](#); 6/16/25]
- K. Declaration of P. Joseph Morrow IV with Respect to the Tabulation of Votes on the Debtors' Joint Plan Pursuant to Chapter 11 of the Bankruptcy Code [[Docket No. 465](#); 6/18/25]

Response Deadline: June 16, 2025 at 4:00 p.m. (ET); extended for certain parties

Objections/Informal Responses:

- L. Statement of the Official Committee of Unsecured Creditors in Support of Debtors' Amended Joint Plan [[Docket No. 430](#); 6/11/25]
- M. Joint Limited Objection of the Texas Taxing Authorities to the Debtors' Amended Joint Plan Pursuant to Chapter 11 of the Bankruptcy Code [[Docket No. 459](#); 6/16/25]
- N. Informal responses from:
  - a. The United States of America
  - b. The ABL Agent
  - c. The Term Loan Agent
  - d. The Committee
  - e. Certain landlords represented by Kelley Drye & Warren LLP
  - f. Chubb Insurance Companies
  - g. Rand Accessories

Additional Documents:

- O. Notice of Filing of Debtors' Revised Amended Joint Plan Pursuant to Chapter 11 of the Bankruptcy Code [[Docket No. 472](#); 6/23/25]

- P. Declaration of Michael Brown in Support of Confirmation of the Debtors' Amended Joint Plan Pursuant to Chapter 11 of the Bankruptcy Code [[Docket No. 473](#); 6/23/25]**
- Q. Declaration of Scott Vogel in Support of Confirmation of the Debtors' Amended Joint Plan Pursuant to Chapter 11 of the Bankruptcy Code [[Docket No. 474](#); 6/23/25]**
- R. Debtors' Memorandum of Law in Support of Confirmation of the Debtors' Joint Amended Plan Pursuant to Chapter 11 of the Bankruptcy Code [[Docket No. 475](#); 6/23/25]**
- S. Notice of Filing of Revised Proposed Findings of Fact, Conclusions of Law, and Order Approving the Debtors' Amended Joint Plan Pursuant to Chapter 11 of the Bankruptcy Code [[Docket No. 476](#); 6/23/25]**

**Status:** The Debtors have resolved, or anticipate resolving, all informal and formal responses listed above. The Debtors have filed a revised Amended Plan, confirmation brief, appropriate declarations, and revised confirmation order reflecting resolutions to address comments received from various third parties. The Debtors anticipate seeking confirmation of the Amended Plan on a fully consensual basis. This matter is going forward.

Dated: June 23, 2025

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Andrew L. Magaziner

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*