

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	
)	Chapter 11
)	
PGX HOLDINGS, INC., et al., ¹)	Case No. 23-10718 (CTG)
)	
Debtors.)	(Joint Administration Requested)
)	
)	Related to Docket No. 14

NOTICE OF REVISED PROPOSED ORDER
REGARDING CREDITOR MATRIX MOTION

PLEASE TAKE NOTICE that on June 4, 2023 (the “Petition Date”), each of the above-captioned debtors and debtors in possession (the “Debtors”) filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), with the Clerk of the United States Bankruptcy Court for the District of Delaware. The Debtors are continuing to operate their businesses and manage their affairs as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE on June 5, 2023, the Debtors filed the *Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) File a Consolidated List of Creditors in Lieu of Submitting a Separate Mailing Matrix for Each Debtor, (B) File a Consolidated List of the Debtors’ Thirty Largest Unsecured Creditors, (C) Serve Certain Parties in Interest by Email, (D) Approve the Form and Manner of Service of the Notice of Commencement, (E) Redact or Withhold Certain Confidential Information, and (F) Redact Certain Personally*

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: PGX Holdings, Inc. (2510); Credit Repair UK, Inc. (4798); Credit.com, Inc. (1580); Creditrepair.com Holdings, Inc. (7536); Creditrepair.com, Inc. (7680); eFolks Holdings, Inc. (5213); eFolks, LLC (5256); John C. Heath, Attorney At Law PC (8362); Progrexion ASG, Inc. (5153); Progrexion Holdings, Inc. (7123); Progrexion IP, Inc. (5179); Progrexion Marketing, Inc. (5073); and Progrexion Teleservices, Inc. (5110). The location of the Debtors’ service address for purposes of these chapter 11 cases is: 257 East 200 South, Suite 1200, Salt Lake City, Utah 84111.



231071823060600000000002

Identifiable Information and (II) Granting Related Relief [Docket No. 14] (the “Creditor Matrix Motion”).

PLEASE TAKE FURTHER NOTICE that the Debtors have engaged in discussions with the Office of the United States Trustee for the District of Delaware (the “UST”) regarding the Creditor Matrix Motion and have revised the proposed order that they intend to present at the first day hearing (the “Revised Proposed Order”) to incorporate comments from the UST. A copy of the Revised Proposed Order is attached hereto as **Exhibit A**. A copy of the Revised Proposed Order marked to show changes from the version filed with the Creditor Matrix Motion is attached hereto as **Exhibit B**. The Debtors believe the Revised Proposed Order addresses the UST’s concerns for purposes of entry of an interim order with respect to the Creditor Matrix Motion, with all rights reserved with respect to entry of a final order.

Dated: June 6, 2023
Wilmington, Delaware

/s/ Michael W. Yurkewicz

**KLEHR HARRISON HARVEY
BRANZBURG LLP**

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*Proposed Co-Counsel to the Debtors and
Debtors in Possession*

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- and -

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*Proposed Co-Counsel to the Debtors and Debtors
in Possession*

Exhibit A

final basis, and (c) granting related relief, all as more fully set forth in the Motion; and upon the First Day Declaration; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and this Court having found that the Debtors' notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the "Hearing"); and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is granted on an interim basis as set forth herein.
2. The final hearing (the "Final Hearing") on the Motion shall be held on _____, 2023, at __:__.m., prevailing Eastern Time. Any objections or responses to entry of a final order on the Motion shall be filed on or before 4:00 p.m., prevailing Eastern Time, on _____, 2023 and shall be served on: (a) the Debtors, 257 East 200 South, Suite 1200, Salt Lake City, Utah 84111, Attn.: Eric Kamerath; (b) proposed counsel to the Debtors (i) Kirkland & Ellis LLP, 601 Lexington Avenue, New York, New York 10022, Attn.: Joshua A. Sussberg, P.C. (joshua.sussberg@kirkland.com), (ii) Kirkland & Ellis LLP, 300 North LaSalle, Chicago, Illinois,

60654, Attn.: Spencer Winters (spencer.winters@kirkland.com), Whitney C. Fogelberg (whitney.fogelberg@kirkland.com), and Alison J. Wirtz (alison.wirtz@kirkland.com), (iii) Klehr Harrison Harvey Branzburg LLP, 919 North Market Street, Suite 1000, Wilmington, Delaware 19801, Attn.: Domenic E. Pacitti (dpacitti@klehr.com) and Michael W. Yurkewicz (myurkewicz@klehr.com), and (iv) Klehr Harrison Harvey Branzburg LLP, 1835 Market Street, Suite 1400, Philadelphia, Pennsylvania 19103, Attn.: Morton R. Branzburg (mbranzburg@klehr.com); (c) the United States Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801, Attn.: Jane Leamy (jane.m.leafy@usdoj.gov); and (d) any statutory committee appointed in these chapter 11 cases.

3. The requirements of Local Rules 1007-2(a) and 2002-1(f)(v) that separate mailing matrices be submitted for each Debtor are permanently waived, and the Debtors are authorized, but not directed, to submit a consolidated Creditor Matrix, *provided* that if any of these chapter 11 cases converts to a case under chapter 7 of the Bankruptcy Code, the applicable Debtor shall file its own creditor mailing matrix.

4. The Debtors are authorized to file a consolidated list of their thirty largest unsecured creditors.

5. The Debtors are authorized, on an interim basis, to redact on the Creditor Matrix, Schedules and Statements, affidavits of service, or other document filed with the Court (a) the home and email addresses of individual creditors and individual equity holders and (b) the names, home addresses, and email addresses of the clients of Lexington Law and the Debtors' customers. The Debtors shall provide an unredacted version of the Creditor Matrix, Schedules and Statements, and any other filings redacted pursuant to this Interim Order to (a) the Court, (b) the U.S. Trustee, (c) counsel to any official committee appointed in these chapter 11 cases, (d) any party in interest

upon a request to the Debtors (email to counsel is sufficient) or to the Court that is reasonably related to these chapter 11 cases, subject to the restrictions of the CCPA, UCPA, and applicable legal ethical rules, and (e) the Claims and Noticing Agent; *provided* that any receiving party shall not transfer or otherwise provide such unredacted document to any person or entity not party to the request. The Debtors shall inform the U.S. Trustee promptly after denying any request for an unredacted document pursuant to this Interim Order. Nothing herein precludes a party in interest's right to file a motion requesting that the Court unseal the information redacted by this Interim Order.

6. For the avoidance of doubt, the Debtors shall file an unredacted creditor matrix under seal with the Court.

7. The Debtors are authorized, on an interim basis, pursuant to section 107(b)(1) of the Bankruptcy Code, to redact the names, home addresses, and email addresses of their customers from any filings with the Court or made publicly available in these chapter 11 cases.

8. The Notice of Commencement and the Notice of Sale of Lexington Law, substantially in the forms attached hereto as Exhibit 1 and Exhibit 2 respectively, are hereby approved. Service of the Notice of Commencement shall be deemed adequate and sufficient notice of (a) the commencement of these chapter 11 cases and (b) the scheduling of the meeting of creditors under section 341 of the Bankruptcy Code.

9. The Debtors, through their Claims and Noticing Agent, are authorized to serve all pleadings and papers, including the Notice of Commencement and the Notice of Sale of Lexington Law, on all parties listed on the Creditor Matrix via email or mail, as set forth herein.

10. The service requirements of Bankruptcy Rule 2002(g) hereby are modified to permit email service to (a) current and former customers and clients with valid email addresses on

file, unless such current or former customer or client requests to be served hard copies by mail, and (b) creditors (other than those in clause (a)) with valid email addresses on file but no physical address information that (i) have not designated a mailing address under Bankruptcy Rules 2002(g)(1) or 5003(e) and (ii) do not request to be served hard copies by mail.

11. When serving any notice in these chapter 11 cases on the Debtors' employees, the Claims and Noticing Agent, and, where applicable, the Clerk of the Court, shall use the current email address of employees (current or former) or, if service is provided at a physical address, at such employee's home address.

12. Nothing in this Interim Order shall waive or otherwise limit the service of any document upon or the provision of any notice to any individual whose personally identifiable information is sealed or redacted pursuant to this Interim Order. Service of all documents and notices upon individuals whose personally identifiable information is sealed or redacted pursuant to this Interim Order shall be confirmed in the corresponding certificate of service.

13. To the extent a party in interest files a document on the docket in these chapter 11 cases that is required to be served on creditors whose information is under seal pursuant to this Interim Order, such party in interest should contact counsel for the Debtors who shall work in good faith, with the assistance of KCC, to effectuate the service on such party's behalf.

14. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of Bankruptcy Rule 6004(a) and the Local Rules are satisfied by such notice.

15. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Interim Order in accordance with the Motion.

16. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Interim Order.

Exhibit 1

Notice of Commencement

Information to identify the case:

Debtor

PGX Holdings, Inc., *et al.*

EIN: 45-4352510

United States Bankruptcy Court for the **District of Delaware**Case number: **23-10718 (CTG)**Date cases filed for chapter 11: **June 4, 2023**

Official Form 309F1 (For Corporations or Partnerships)

Notice of Chapter 11 Bankruptcy Case

10/20

For the debtor listed above, a case has been filed under chapter 11 of the Bankruptcy Code. An order for relief has been entered.

This notice has important information about the case for creditors and debtors, including information about the meeting of creditors and deadlines. Read both pages carefully.

The filing of the case imposed an automatic stay against most collection activities. This means that creditors generally may not take action to collect debts from the debtor or the debtor's property. For example, while the stay is in effect, creditors cannot sue, assert a deficiency, repossess property, or otherwise try to collect from the debtor. Creditors cannot demand repayment from the debtor by mail, phone, or otherwise. Creditors who violate the stay can be required to pay actual and punitive damages and attorney's fees.

Confirmation of a chapter 11 plan may result in a discharge of debt. A creditor who wants to have a particular debt excepted from discharge may be required to file a complaint in the bankruptcy clerk's office within the deadline specified in this notice. (See line 11 below for more information.)

To protect your rights, consult an attorney. All documents filed in the case may be inspected at the bankruptcy clerk's office at the address listed below or through PACER (Public Access to Court Electronic Records at <https://pacer.uscourts.gov>).

The staff of the bankruptcy clerk's office cannot give legal advice.

Do not file this notice with any proof of claim or other filing in the case.

Valid Picture ID is required for access to the J. Caleb Boggs Federal Building. Additionally, Debtor(s) must also present photo ID plus original verification of his/her social security number to the Bankruptcy Trustee. If you do not have a photo ID and/or original verification of your social security number, please contact the Office of the United States Trustee's (302-573-6491).

1. Debtor's full name: PGX Holdings, Inc.

2. All other names used in the last 8 years: See Chart Below

Jointly Administered Cases	Other Names (Last 8 Years)	Case No.	Tax ID No.
PGX Holdings, Inc.		23-10718 (CTG)	45-4352510
Credit Repair UK, Inc.		23-10719 (CTG)	35-2474798
Credit.com, Inc.		23-10720 (CTG)	94-3341580
Creditrepair.com Holdings, Inc.		23-10721 (CTG)	45-4357536
Creditrepair.com, Inc.		23-10722 (CTG)	45-4357680
eFolks Holdings, Inc.		23-10723 (CTG)	27-2815213
eFolks, LLC		23-10724 (CTG)	27-2815256
John C. Heath, Attorney At Law PC	Lexington Law Firm	23-10725 (CTG)	34-2038362
Progrexion ASG, Inc.		23-10726 (CTG)	27-2815153
Progrexion Holdings, Inc.		23-10727 (CTG)	27-2827123
Progrexion IP, Inc.		23-10728 (CTG)	27-2815179
Progrexion Marketing, Inc.		23-10729 (CTG)	27-2815073

Progrexion Teleservices, Inc.		23-10730 (CTG)	27-2815110
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3. Address: 257 East 200 South, Suite 1200, Salt Lake City, Utah, 84111

4. Debtors' Attorneys

Name and address

Contact phone: (302) 426-1189
(215) 569-3007

KLEHR HARRISON HARVEY
BRANZBURG LLP
Domenic E. Pacitti
Michael W. Yurkewicz
919 North Market Street,
Suite 1000
Wilmington, Delaware 19801

KIRKLAND & ELLIS LLP
KIRKLAND & ELLIS INTERNATIONAL LLP
Joshua A. Sussberg, P.C.
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New York, New York 10022

Email: dpacitti@klehr.com
myurkewicz@klehr.com
mbranzburg@klehr.com

Contact Phone: (212) 446-4800
(312) 862-2000

and

Morton R. Branzburg
1835 Market Street, Suite 1400
Philadelphia, Pennsylvania
19103

Spencer A. Winters
Whitney C. Fogelberg
Alison J. Wirtz
300 North LaSalle
Chicago, Illinois 60654

Email: joshua.sussberg@kirkland.com
spencer.winters@kirkland.com
whitney.fogelberg@kirkland.com
alison.wirtz@kirkland.com

Debtors' Claims and Noticing Agent

If you have questions about this notice, please contact
Kurtzman Carson Consultants LLC

Contact Phone: (888) 249-2721 (toll free) or
(310) 751-2604 (international)
Email: www.kccllc.net/PGX/Inquiry
Website: www.kccllc.net/PGXHoldings

5. Bankruptcy clerk's office

Documents in this case may be filed
at this address.

You may inspect all records filed in
this case at this office or online at
<https://pacer.uscourts.gov>.

**824 N. Market Street, 3rd Floor
Wilmington, DE 19801**

Hours open: Monday – Friday 8:00 AM – 4:00 PM
Contact phone 302-252-2900

6. Meeting of creditors

[•], 2023, at [•] a.m. (ET) Location:

**J. Caleb Boggs Federal Building
844 King Street
3rd Floor, Room 3209
Wilmington, DE 19801**

The debtor's representative must
attend the meeting to be questioned
under oath.
Creditors may attend, but are not
required to do so.

The meeting may be continued or
adjourned to a later date. If so,
the date will be on the court
docket.

**The meeting of Creditors will
be held by phone.
Please call [•] and use
access code [•] to join the
meeting.**

**7. Proof of claim
deadline**

Deadline for filing proof of claim:

**Not yet set. If a deadline is set, the court will
send you another notice.**

A proof of claim is a signed statement describing a creditor's claim. A proof of claim form may be obtained at www.uscourts.gov or any bankruptcy clerk's office.

Your claim will be allowed in the amount scheduled unless:

- your claim is designated as disputed, contingent, or unliquidated;
- you file a proof of claim in a different amount; or
- you receive another notice.

If your claim is not scheduled or if your claim is designated as disputed, contingent, or unliquidated, you must file a proof of claim or you might not be paid on your claim and you might be unable to vote on a plan. You may file a proof of claim even if your claim is scheduled.

You may review the schedules at the bankruptcy clerk's office or online at <https://pacer.uscourts.gov>.

Secured creditors retain rights in their collateral regardless of whether they file a proof of claim. Filing a proof of claim submits a creditor to the jurisdiction of the bankruptcy court, with consequences a lawyer can explain. For example, a secured creditor who files a proof of claim may surrender important nonmonetary rights, including the right to a jury trial.

<p>8. Exception to discharge Deadline The bankruptcy clerk's office must receive a complaint and any required filing fee by the following deadline.</p>	<p>If § 523(c) applies to your claim and you seek to have it excepted from discharge, you must start a judicial proceeding by filing a complaint by the deadline stated below.</p> <p>Deadline for filing the complaint: <u>To be determined.</u></p>
<p>9. Creditors with a foreign address</p>	<p>If you are a creditor receiving notice mailed to a foreign address, you may file a motion asking the court to extend the deadlines in this notice. Consult an attorney familiar with United States bankruptcy law if you have any questions about your rights in this case.</p>
<p>10. Filing a Chapter 11 bankruptcy case</p>	<p>Chapter 11 allows debtors to reorganize or liquidate according to a plan. A plan is not effective unless the court confirms it. You may receive a copy of the plan and a disclosure statement telling you about the plan, and you may have the opportunity to vote on the plan. You will receive notice of the date of the confirmation hearing, and you may object to confirmation of the plan and attend the confirmation hearing. Unless a trustee is serving, the debtor will remain in possession of the property and may continue to operate its business.</p>
<p>11. Discharge of debts</p>	<p>Confirmation of a chapter 11 plan may result in a discharge of debts, which may include all or part of your debt. See 11 U.S.C. § 1141(d). A discharge means that creditors may never try to collect the debt from the debtor except as provided in the plan. If you want to have a particular debt owed to you excepted from the discharge and § 523(c) applies to your claim, you must start a judicial proceeding by filing a complaint and paying the filing fee in the bankruptcy clerk's office by the deadline.</p>

If you have questions about this notice, please contact the Debtors' Claims and Noticing Agent, Kurtzman Carson Consultants LLC, at (888) 249-2721 (toll free) or (310) 751-2604 (international), or via email by submitting an inquiry at www.kccllc.net/PGX/Inquiry.

You may also find out more information at www.kccllc.net/PGX

Exhibit 2

Notice of Sale of Lexington Law

Notice of Sale of Lexington Law

Dear Lexington Law Client,

As you may be aware, Lexington Law (the “Company”) announced it has voluntarily filed for Chapter 11 reorganization under the United States Bankruptcy Code on June 4, 2023.

As one of our valued clients, you are our top priority. That is why we are writing to provide additional details on what this reorganization process means for you. Included in this letter is the “Notice of Commencement,” a legal document sent to a company’s creditors and other parties in interest letting them know that the company has filed for Chapter 11 reorganization in United States bankruptcy court (the “Bankruptcy Court”), explaining what this means, and informing them of certain dates and deadlines. You are receiving this letter because you have a signed engagement letter with Lexington Law.

Filing for Chapter 11 does not necessarily mean that a company is going out of business, but instead that it may restructure or sell its business with the goal of emerging from Chapter 11 stronger than before. In this case, the Company filed for Chapter 11 to pursue a sale transaction and to continue the same business operations after the sale is completed.

Chapter 11 allows daily business operations to continue as usual. Therefore, for your purposes, the Company will continue to operate in the normal course, and there should be minimal disruption to the legal services you are receiving from Lexington Law. We are here to ensure this process runs as seamlessly as possible for our clients by honoring customer programs and prioritizing an excellent client experience.

The filing will provide incremental funding to the business, which will help the Company manage the current challenges it faces, so that it can ultimately better serve you.

However, as clients of a law firm that is expected to be sold, we also wanted to make you aware of your rights in connection with such a sale:

PLEASE TAKE NOTICE OF THE FOLLOWING:

- **Lexington Law will be sold to a new law firm owned by the current owners of Lexington Law or to another buyer approved by the Bankruptcy Court (the “Buyer”). The Buyer will continue to provide the same legal services as Lexington Law currently provides to customers.**
- **As a Lexington Law client, you have the right to retain another law firm or counsel, or to take possession of your client file that is currently held by Lexington Law.**
- **You may also agree to have your client file transferred from Lexington Law to the Buyer, in which case you will become a client of the Buyer.**
- **If you plan to retain another law firm or counsel, or want to take possession of your client file, you MUST visit www.kccllc.net/PGX and complete the opt-out form available on that page.**
 - **The deadline by which you must complete this form if you wish to opt out is [●], 2023.**
- **If Lexington Law does not receive your completed opt-out form by [●], 2023, your client file will automatically be transferred from Lexington Law to the Buyer. Even if transferred, however, your rights under your engagement letter continue.**

Exhibit B

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

)	
In re:)	Chapter 11
)	
PGX HOLDINGS, INC., <i>et al.</i> , ¹)	Case No. 23-10718 (CTG)
)	
Debtors.)	(Joint Administration Requested)
)	Re: Docket No. ___

INTERIM ORDER

(I) AUTHORIZING THE DEBTORS TO (A) FILE A CONSOLIDATED LIST OF CREDITORS IN LIEU OF SUBMITTING A SEPARATE MAILING MATRIX FOR EACH DEBTOR, (B) FILE A CONSOLIDATED LIST OF THE DEBTORS’ THIRTY LARGEST UNSECURED CREDITORS, (C) SERVE CERTAIN PARTIES IN INTEREST BY EMAIL, (D) APPROVE THE FORM AND MANNER OF SERVICE OF THE NOTICE OF COMMENCEMENT, (E) REDACT OR WITHHOLD CERTAIN CONFIDENTIAL INFORMATION, AND (F) REDACT CERTAIN PERSONALLY IDENTIFIABLE INFORMATION AND (II) GRANTING RELATED RELIEF

Upon the motion (the “Motion”)² of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) for the entry of an interim order (this “Interim Order”), (a) authorizing the Debtors to (i) file a consolidated list of creditors in lieu of submitting a separate mailing matrix for each Debtor, (ii) file a consolidated list of the Debtors’ thirty largest unsecured creditors in lieu of filing lists for each Debtor, (iii) serve certain parties in interest by email, (iv) approve the form and manner of service of the notice of commencement of these chapter 11 cases, (v) redact or withhold certain confidential information of customers, and (vi) redact certain personally identifiable information, (b) scheduling a final hearing to consider

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: PGX Holdings, Inc. (2510); Credit Repair UK, Inc. (4798); Credit.com, Inc. (1580); Creditrepair.com Holdings, Inc. (7536); Creditrepair.com, Inc. (7680); eFolks Holdings, Inc. (5213); eFolks, LLC (5256); John C. Heath, Attorney At Law PC (8362); Progrexion ASG, Inc. (5153); Progrexion Holdings, Inc. (7123); Progrexion IP, Inc. (5179); Progrexion Marketing, Inc. (5073); and Progrexion Teleservices, Inc. (5110). The location of the Debtors’ service address for purposes of these chapter 11 cases is: 257 East 200 South, Suite 1200, Salt Lake City, Utah 84111.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

approval of the Motion on a final basis, and (c) granting related relief, all as more fully set forth in the Motion; and upon the First Day Declaration; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and this Court having found that the Debtors' notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the "Hearing"); and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is granted on an interim basis as set forth herein.
2. The final hearing (the "Final Hearing") on the Motion shall be held on _____, 2023, at ___:___ .m., prevailing Eastern Time. Any objections or responses to entry of a final order on the Motion shall be filed on or before 4:00 p.m., prevailing Eastern Time, on _____, 2023 and shall be served on: (a) the Debtors, 257 East 200 South, Suite 1200, Salt Lake City, Utah 84111, Attn.: Eric Kamerath; (b) proposed counsel to the Debtors (i) Kirkland & Ellis LLP, 601 Lexington Avenue, New York, New York 10022, Attn.: Joshua A. Sussberg, P.C.

(joshua.sussberg@kirkland.com), (ii) Kirkland & Ellis LLP, 300 North LaSalle, Chicago, Illinois, 60654, Attn.: Spencer Winters (spencer.winters@kirkland.com), Whitney C. Fogelberg (whitney.fogelberg@kirkland.com), and Alison J. Wirtz (alison.wirtz@kirkland.com), (iii) Klehr Harrison Harvey Branzburg LLP, 919 North Market Street, Suite 1000, Wilmington, Delaware 19801, Attn.: Domenic E. Pacitti (dpacitti@klehr.com) and Michael W. Yurkewicz (myurkewicz@klehr.com), and (iv) Klehr Harrison Harvey Branzburg LLP, 1835 Market Street, Suite 1400, Philadelphia, Pennsylvania 19103, Attn.: Morton R. Branzburg (mbranzburg@klehr.com); (c) the United States Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801, Attn.: Jane Leamy (jane.m.leafy@usdoj.gov); and (d) any statutory committee appointed in these chapter 11 cases.

3. The requirements of Local Rules 1007-2(a) and 2002-1(f)(v) that separate mailing matrices be submitted for each Debtor are permanently waived, and the Debtors are authorized, but not directed, to submit a consolidated Creditor Matrix, *provided* that if any of these chapter 11 cases converts to a case under chapter 7 of the Bankruptcy Code, the applicable Debtor shall file its own creditor mailing matrix.

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5. The Debtors are authorized, on an interim basis, to redact on the Creditor Matrix, Schedules and Statements, affidavits of service, or other document filed with the Court (a) the home and email addresses of individual creditors and individual equity holders and (b) the names, home addresses, and email addresses of the clients of Lexington Law and the Debtors' customers. The Debtors shall provide an unredacted version of the Creditor Matrix, Schedules and Statements, and any other filings redacted pursuant to this Interim Order to (a) the Court, (b)

the U.S. Trustee, (c) counsel to any official committee appointed in these chapter 11 cases, (d) any party in interest upon a request to the Debtors (email to counsel is sufficient) or to the Court that is reasonably related to these chapter 11 cases, subject to the restrictions of the CCPA, UCPA, and applicable legal ethical rules, and (e) the Claims and Noticing Agent; *provided* that any receiving party shall not transfer or otherwise provide such unredacted document to any person or entity not party to the request. The Debtors shall inform the U.S. Trustee promptly after denying any request for an unredacted document pursuant to this Interim Order. Nothing herein precludes a party in interest's right to file a motion requesting that the Court unseal the information redacted by this Interim Order.

6. For the avoidance of doubt, the Debtors shall file an unredacted creditor matrix under seal with the Court.

7. The Debtors are authorized, on an interim basis, pursuant to section 107(b)(1) of the Bankruptcy Code, to redact the names, home addresses, and email addresses of their customers from any filings with the Court or made publicly available in these chapter 11 cases.

8. The Notice of Commencement and the Notice of Sale of Lexington Law, substantially in the forms attached hereto as **Exhibit 1** and **Exhibit 2** respectively, are hereby approved. Service of the Notice of Commencement shall be deemed adequate and sufficient notice of (a) the commencement of these chapter 11 cases and (b) the scheduling of the meeting of creditors under section 341 of the Bankruptcy Code.

9. The Debtors, through their Claims and Noticing Agent, are authorized to serve all pleadings and papers, including the Notice of Commencement and the Notice of Sale of Lexington Law, on all parties listed on the Creditor Matrix via email or mail, as set forth herein.

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10. The service requirements of Bankruptcy Rule 2002(g) hereby are modified to permit email service to (a) current and former customers and clients with valid email addresses on file, unless such current or former customer or client requests to be served hard copies by mail, and (b) ~~other~~ creditors (other than those in clause (a)) with valid email addresses on file but no physical address information that (i) have not designated a mailing address under Bankruptcy Rules 2002(g)(1) or 5003(e) and (ii) do not request to be served hard copies by mail.

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11. When serving any notice in these chapter 11 cases on the Debtors' employees, the Claims and Noticing Agent, and, where applicable, the Clerk of the Court, shall use the ~~employee's current~~ email address of employees (current or former) or, if service is provided at a physical address, at such employee's home address.

12. Nothing in this Interim Order shall waive or otherwise limit the service of any document upon or the provision of any notice to any individual whose personally identifiable information is sealed or redacted pursuant to this Interim Order. Service of all documents and notices upon individuals whose personally identifiable information is sealed or redacted pursuant to this Interim Order shall be confirmed in the corresponding certificate of service.

13. To the extent a party in interest files a document on the docket in these chapter 11 cases that is required to be served on creditors whose information is under seal pursuant to this Interim Order, such party in interest should contact counsel for the Debtors who shall work in good faith, with the assistance of KCC, to effectuate the service on such party's behalf.

14. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of Bankruptcy Rule 6004(a) and the Local Rules are satisfied by such notice.

15. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Interim Order in accordance with the Motion.

16. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Interim Order.

Exhibit 1

Notice of Commencement

Exhibit 2

Notice of Sale of Lexington Law

Summary report:	
Litera Compare for Word 11.0.0.61 Document comparison done on 6/5/2023 6:09:12 PM	
Style name: No Footers	
Intelligent Table Comparison: Active	
Original DMS: iw://DMS.KIRKLAND.COM/LEGAL/97421971/1	
Modified DMS: iw://DMS.KIRKLAND.COM/LEGAL/97421971/2	
Changes:	
Add	5
Delete	2
Move From	0
Move To	0
Table Insert	0
Table Delete	0
Table moves to	0
Table moves from	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
Total Changes:	7