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I. Uncontested Matters

- A. 365(d)(4) Motion.** Debtors’ Motion for Entry of Order Extending Time to Assume or Reject Unexpired Leases of Nonresidential Real Property Pursuant to 11 U.S.C. § 365(d)(4) [Docket No. 436]

Response Deadline: On or before September 30, 2024 at 2:00 p.m. (prevailing Eastern Time)

Responses Filed:

1. Response Opposing Debtors’ Motion for Entry of Order Extending Time to Assume or Reject Unexpired Leases of Nonresidential Real Property Pursuant to 11 U.S.C. § 365(d)(4) [Docket No. 456]
2. Withdrawal of Response Opposing Debtors’ Motion for Entry of Order Extending Time to Assume or Reject Unexpired Leases of Nonresidential Real Property Pursuant to 11 U.S.C. § 365(d)(4) [Docket No. 465]

Related Documents:

1. Certificate of Service [Docket No. 440]
2. Notice of Rescheduled Hearing [Docket No. 453]

Status: This matter is going forward.

II. Contested Matters

- A. *Solicitation Procedures Motion.*** Debtors’ Motion for Entry of Order (I) Approving Disclosure Statement, (II) Scheduling Confirmation Hearing, (III) Establishing Procedures for Solicitation and Tabulation of Votes on Plan, (IV) Approving Certain Forms and Notices, and (V) Granting Related Relief [Docket No. 316]

Response Deadline: September 4, 2024 at 4:00 p.m. (prevailing Eastern Time). Extended to September 20, 2024 at 4:00 p.m. (prevailing Eastern Time) for the Office of the United States Trustee for Region 21, the United States of America, and the Official Committee of Unsecured Creditors.

Responses Filed:

1. Objection to Confirmation and Potential Assignment of Executory Contracts [Docket No. 321]
2. Objection to Debtors' (I) Notice to Contract Parties and (II) Debtors' Joint Chapter 11 Plan of Reorganization [Docket No. 351]
3. Objection of Cigna to Debtors' Disclosure Statement [Docket No. 368]
4. Objection of AFSCME to Debtors' Disclosure Statement and Reservation of Rights with Respect to Potentially Assumed Collective Bargaining Agreements [Docket Nos. 384, 385]
5. Joinder of United Steelworkers to Objection of AFSCME to Debtors' Disclosure Statement and Reservation of Rights with Respect to Potentially Assumed Collective Bargaining Agreements [Docket No. 386]
6. United States Trustee's Objection to Debtors' Amended Disclosure Statement and Form of Ballots [Docket No. 445]
7. United States' Limited Objection to the Debtors' Combined Disclosure Statement and Joint First Amended Chapter 11 Plan of Reorganization [Docket No. 446]

Related Documents:

1. Debtors' Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Docket No. 273]
2. Notice of Hearing and Deadline to Object to Debtors' Motion for Entry of Order (I) Approving Disclosure Statement, (II) Scheduling Confirmation Hearing, (III) Establishing Procedures for Solicitation and Tabulation of Votes on Plan, (IV) Approving Certain Forms and Notices, and (V) Granting Related Relief [Docket No. 317]
3. Certificate of Service [Docket No. 320]
4. Notice of Continued Disclosure Statement Hearing and Sale Hearing [Docket No. 350]
5. Notice of (I) Cancellation of Auction and Sale Hearing and (II) Agreement to Seek Conditional Approval of Disclosure Statement at Disclosure Statement Hearing [Docket No. 404]
6. Notice of Continued Disclosure Statement Hearing [Docket No. 428]

7. Notice of Filing of Debtors' Combined Disclosure Statement and Joint First Amended Chapter 11 Plan of Reorganization [Docket No. 438]
8. Notice of (A) Cancelled Disclosure Statement Hearing on September 23, 2024 at 1:30 p.m. (prevailing Eastern Time) and (B) Continued Disclosure Statement Hearing on September 30, 2024 at 2:00 p.m. (prevailing Eastern Time) [Docket No. 450]
9. Debtors' Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Docket No. 461]
10. Notice of Filing of Redline Version of Debtors' Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Docket No. 462]
11. Notice of (A) Filing of Revised Proposed Order (I) Conditionally Approving Disclosure Statement, (II) Scheduling Combined Hearing, (III) Establishing Procedures for Solicitation and Tabulation of Votes on Plan, (IV) Approving Certain Forms and Notices, and (V) Granting Related Relief and (B) Notice of Hearing on September 30, 2024 at 2:00 p.m. (prevailing Eastern Time) [Docket No. 463]

Status: This matter is going forward.

Dated: Atlanta, Georgia
September 27, 2024

MCDERMOTT WILL & EMERY LLP

/s/ Daniel M. Simon

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CERTIFICATE OF SERVICE

I hereby certify that on this date a true and correct copy of the foregoing was served by the Court's CM/ECF system on all counsel of record registered in these Chapter 11 Cases through CM/ECF. The Debtors' claims and noticing agent, Kurtzman Carson Consultants LLC d/b/a Verita Global, will be filing a supplemental certificate of service on the docket to reflect any additional service of the foregoing.

Dated: Atlanta, Georgia
September 27, 2024

MCDERMOTT WILL & EMERY LLP

/s/ Daniel M. Simon

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