

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

	§	
In re:	§	Chapter 11
	§	
NEIGHBORS LEGACY HOLDINGS, INC.,	§	Case No. 18-33836
<i>et al.,</i>	§	
	§	Jointly Administered
Debtors. ¹	§	

DEBTORS’ AGENDA OF MATTERS SET FOR SEPTEMBER 6, 2018

TO THE HONORABLE MARVIN ISGUR:

The above-referenced debtors and debtors in possession (collectively, the “Debtors”) file this Agenda of Matters Set for September 6, 2018, at 2:30 p.m.:

I. SALE MOTION

Debtors’ Emergency Motion (I) for Entry of an Order (A) Approving Auction and Bid Procedures, Including Bid Protections, and (B) Authorizing and Scheduling an Auction for the Sale of the Debtors’ Assets; and (II) For Entry of an Order (A) Approving the Sale of the Debtors’ Assets Free and Clear of all Liens, Claims, Encumbrances and Interests, and (B) Authorizing the Assumption and Assignment of Executory Contracts and Unexpired Leases [Docket No. 20].

Status: The Debtors intend to present evidence in support of the Motion and to request leave to upload a proposed order when the asset purchase agreements have been finalized.

Related Documents:

- a. Order (A) Authorizing and Scheduling an Auction for the Sale of the Debtors’ Assets and (B) Approving Auction and Bid Procedures, Including Payment of Bid Protections [Docket No. 203].
- b. Notice of Filing Disclosure Schedules to Asset Purchase Agreement with Fostre, Inc. [Docket No. 206].

¹ Due to the large number of Debtors in these chapter 11 cases, a complete list of the Debtors and the last four digits of their tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ proposed claims and noticing agent at www.kccllc.net/neighbors. The location of Debtors’ principal place of business and the Debtors’ service address is: 10800 Richmond Avenue, Houston, Texas 77042.



- c. Notice of Entry of Order (A) Authorizing and Scheduling an Auction for the Sale of Debtors' Assets and (B) Approving Auction and Bid Procedures, Including Payment of Bid Protections [Docket No. 208].
- d. Notice of Filing Amendments to Asset Purchase Agreements [Docket No. 235].
- e. Amended Notice of Executory Contracts and Unexpired Leases Subject to Possible Assumption and Assignment and Proposed Cure Amounts [Docket No. 255].
- f. Notice of Filing Revised Schedules of Desired Contracts for Asset Purchase Agreements [Docket No. 266].
- g. Notice of Filing of Revised Schedule 5.03 - Desired 365 Contracts to Asset Purchase Agreement with Fostre, Inc. [Docket No. 272].
- h. Notice of Qualified Bidders [Docket No. 301].
- i. Notice of Highest and Best Bids [Docket No. 324].

Responses Received:

Pending Objections

- 1. Objection and Reservation of Rights by Phoenix HAR Investments LLC to (i) the Debtors' Notice of Executory Contracts and Unexpired Leases Subject to Possible Assumption and Assignment and Proposed Cure Amounts and (ii) Proposed Sale of Assets Including the Harlingen Lease [Docket No. 291].
- 2. Brazoria County Tax Office, Crosby Independent School District, Crosby Municipal Utility District, Harris County Municipal Utility District No. 276, Humble Independent School District, City of Houston, Alief Independent School District, Valley Ranch Municipal Utility District No. 1, Wichita County, Lubbock Central Appraisal District, Midland County, Tyler Independent School District and Potter County Tax Offices' Amended Limited Objection to Debtors' Emergency Motion (i) for an Order (a) Approving Auction and Bid Procedures, including Bid Protections, (b) Authorizing and Scheduling an Auction for Sale of Debtors' Assets, and (ii) for Entry of an Order (a) Approving the Sale of the Debtors' Assets Free and Clear of all Liens Claims, Encumbrances, and Interests, (b) Authorizing the Assumption and Assignment of Executory Contracts and Unexpired Leases [Docket No. 306].
- 3. Email from Mark Mauldin [Docket No. 343].
- 4. Email from Pranav B. Shukla [Docket No. 343].
- 5. Letter from David Haack [Docket No. 345].

6. Email from R. Lee Chilton [Docket No. 346].

7. Letter (Petition) from Kris Ramos [Docket No. 347].

II. MOTION TO REJECT ADMINISTRATIVE SERVICES AGREEMENT

Debtors' Emergency Motion to Reject Administrative Services Agreement [Docket No. 227].

Related Documents:

- a. Notice of Continued Hearing on Debtors' Emergency Motion to Reject Administrative Service Agreement [Docket No. 264].

Responses Received:

Pending Objections

1. Informal objection submitted by Sam Alam.

Status: Going forward.

Dated: September 6, 2018.

PORTER HEDGES LLP

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**PROPOSED COUNSEL FOR DEBTORS
AND DEBTORS IN POSSESSION**

CERTIFICATE OF SERVICE

I certify that on September 6, 2018, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Eric M. English

Eric M. English