

Hearing Date: May 17, 2022 at 2:00 p.m. (EST)

TOGUT, SEGAL & SEGAL LLP

Frank A. Oswald
Brian F. Moore
Amy M. Oden
One Penn Plaza, Suite 3335
New York, New York 10119
(212) 594-5000

*Proposed Counsel to the Debtors
and Debtors in Possession*

KING & SPALDING LLP

Michael R. Handler
1185 Avenue of the Americas
New York, New York 10036
(212) 556-2100

-and-

KING & SPALDING LLP

Thaddeus D. Wilson (*pro hac vice* pending)
Leia Clement Shermohammed (*pro hac vice* pending)
1180 Peachtree Street N.E., Suite 1600
Atlanta, Georgia 30309-3521
(404) 572-4600

*Proposed Special Counsel to the Debtors
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PARETEUM CORPORATION, *et al.*,

Debtors.¹

Chapter 11

Case No.: 22-10615 (LGB)

(Joint Administration Requested)

**NOTICE OF TELEPHONIC HEARING ON
"FIRST-DAY" APPLICATIONS AND MOTIONS**

PLEASE TAKE NOTICE that on May 15, 2022 (the "Petition Date"), the above-captioned debtors and debtors-in-possession (collectively, the "Debtors") filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court").

PLEASE TAKE FURTHER NOTICE that on the Petition Date, the

¹ The Debtors in the Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, if applicable, are: Pareteum Corporation (7538); Pareteum North America Corp. (f/k/a Elephant Talk North America Corp.) (9623); Devicescape Holdings, Inc. (2909); iPass, Inc. (4598); iPass IP LLC (2550); Pareteum Europe B.V.; Artiliium Group Ltd. (f/k/a Artiliium PLC); Pareteum Asia Pte. Ltd.; and Pareteum N.V. (f/k/a Artiliium N.V.). The Debtors' corporate headquarters is located at 1185 Avenue of the Americas, 2nd Floor, New York, NY 10036.



221061522051600000000002

Debtors filed, among other items, the applications and motions that are listed on **Exhibit A** hereto (collectively, the “First Day Pleadings”) and the *Declaration of Laura W. Thomas in Support of the Debtors’ Chapter 11 Petitions and First Day Pleadings* [Docket No. 3] (the “First Day Declaration”).

PLEASE TAKE FURTHER NOTICE that a telephonic hearing to consider the relief requested in the First Day Pleadings will be held on **May 17, 2022, at 2:00 p.m. (prevailing Eastern Time)**, or as soon thereafter as counsel can be heard, before the Honorable Lisa G. Beckerman, United States Bankruptcy Judge for the Southern District of New York, One Bowling Green, New York, New York 10004, via Court Solutions LLC at www.court-solutions.com. Parties wishing to participate in the First Day Hearing must make arrangements through CourtSolutions LLC no later than 10:00 A.M. on the day of the First Day Hearing. Instructions to register for CourtSolutions LLC are attached to the Court’s General Order M-543.

PLEASE TAKE FURTHER NOTICE that Gen. Ord. M-543, along with other temporary procedures implemented by the Bankruptcy Court in connection with the COVID-19 pandemic (including electronic filing procedures for *pro se* parties) can be found by visiting www.nysb.uscourts.gov (the “Bankruptcy Court’s Website”) and clicking on the “Coronavirus COVID-19 Protocol” banner.

PLEASE TAKE FURTHER NOTICE that copies of the First Day Pleadings and First Day Declaration can be viewed and/or obtained by (i) accessing the Bankruptcy Court’s Website for a fee, (ii) visiting the website for the Debtors’ chapter 11 cases at <http://www.kccllc.net/pareteum>, or (iii) contacting the Office of the Clerk of the United States Bankruptcy Court, Southern District of New York. Please note that a PACER password is required to access documents on the Bankruptcy Court’s Website.

Dated: New York, New York
May 16, 2022

PARETEUM CORPORATION, *et al.*
Debtors and Debtors in Possession
By its Proposed Counsel
TOGUT, SEGAL & SEGAL LLP,
By:

/s/Frank A. Oswald
FRANK A. OSWALD
BRIAN F. MOORE
AMY M. ODEN
One Penn Plaza, Suite 3335
New York, New York 10119
Telephone: (212) 594-5000
frankoswald@teamtogut.com
bmoore@teamotogut.com
aoden@teamtogut.com

and;

Michael R. Handler
KING & SPALDING LLP
1185 Avenue of the Americas
New York, New York 10036
Telephone: (212) 556-2100
Facsimile: (212) 556-2222
Email: mhandler@kslaw.com

and

Thaddeus D. Wilson (*pro hac vice*
pending)
Leia Clement Shermohammed (*pro hac*
vice pending)
KING & SPALDING LLP
1180 Peachtree Street N.E. Ste. 1600
Atlanta, GA 30309-3521
Telephone: (404) 572-4600
Facsimile: (404) 572-5100
Email: thadwilson@kslaw.com
lsruermohammed@kslaw.com

Exhibit A

1. **First Day Declaration.**

Declaration of Laura W. Thomas in Support of the Debtors' Chapter 11 Petitions and First Day Pleadings [Docket No. 3].

2. **Joint Administration.**

Debtors' Motion for Entry of an Order Directing Joint Administration of their Chapter 11 Cases [Docket No. 2 *in Lead Case and all affiliated cases*].

3. **Claims Agent Retention.**

Debtors' Application for Entry of an Order (I) Authorizing and Approving the Appointment of Kurtzman Carson Consultants, LLC as Claims and Noticing Agent, Effective *Nunc Pro Tunc* to the Petition Date, and (II) Granting Related Relief [Docket No. 4].

4. **Creditor Matrix.**

Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to (A) Maintain A List of Creditors in Lieu of Submitting A Formatted Mailing Matrix, (B) File A Consolidated List of the Debtors' Top Thirty Creditors and (II) Establishing Procedures for Notifying Parties of the Commencement of these Chapter 11 Cases [Docket No. 5].

5. **Motion to Enforce Automatic Stay.**

Debtors' Motion for Entry of an Order (I) Enforcing the Protections of 11 U.S.C. §§ 362, 365, 525, and 541(c); (II) Approving the Form and Manner of Notice; and (III) Granting Related Relief [Docket No. 6].

6. **SOFAs and Schedules Extension.**

Debtors' Motion for Entry of an Order (I) Extending Time to File Schedules of Assets and Liabilities, Schedules of Current Income and Expenses, Schedules of Executory Contracts and Unexpired Leases, and Statements of Financial Affairs; (II) Extending Time to File Rule 2015.3 Financial Reports, (III) Waiving Requirements to File the List of Equity Holders and Serve Notice of Commencement on All Equity Holders; and (IV) Granting Related Relief [Docket No. 7].

7. **Foreign Vendors.**

Debtors' Motion for Entry of Interim and Final Orders Authorizing the Debtors to Pay the Prepetition Claims of Certain Foreign Vendors [Docket No. 11].

8. **Taxes.**

Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing, But Not Directing the Debtors to Pay the Prepetition Taxes and Fees (II) Authorizing Applicable Banks and Other Financial Institutions to Honor and Process Related Checks and (III) Granting Related Relief [Docket No. 12].

9. **Wages and Employee Benefits.**

Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing, But Not Directing, The Debtors to (A) Pay Prepetition Wages, Salaries, Employee Benefits, Payroll Taxes and Other Compensation and (B) Maintain Employee Compensation and Benefits Programs and Pay Related Administrative Obligations, (II) Authorizing Applicable Banks and Other Financial Institutions to Honor and Process Related Checks and Transfers; and (III) Granting Related Relief [Docket No. 8].

10. **Insurance Motion.**

Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing, But Not Directing the Debtors to (A) Continue Their Insurance Policies and Pay all Obligations Thereof, (B) Renew, Supplement, Modify, or Purchase New Insurance Coverage, (C) Maintain Surety Bonds, (D) Honor the Terms of the Financing Agreement and Pay Premiums Thereunder, (II) Authorizing Applicable Banks and Other Financial Institutions to Honor and Process Related Checks and Transfers and (III) Granting Related Relief [Docket No. 10].

11. **Cash Management.**

Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate their Cash Management System, Including Existing Bank Accounts, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Bank Accounts and Utilize Existing Business Forms, and (D) Continue to Perform Intercompany Transactions, and (II) Granting Related Relief [Docket No. 9].

12. **DIP Financing.**

Debtors' Motion for Entry of Interim and Final Orders, Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, 503, 506, 507 and 552, (I) Authorizing Debtors to (A) Obtain Post-Petition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to the Prepetition Secured Parties, (IV) Modifying the Automatic Stay, (V) Scheduling a Final Hearing and (VI) Granting Related Relief [Docket No. 14].

Related Filing:

Declaration of Glenn Tobias in Support of Debtor-In-Possession Financing Motion and Bidding Procedures and Sale Motion [Docket No. 15].

13. **Bid Procedures.**

Motion of Debtors for Entry of Orders (I)(A) Approving Bidding Procedures for Sales of Debtors Assets, (B) Approving Stalking Horse Bid Protections, (C) Scheduling Auction for and Hearing to Approve Sales of Debtors Assets, (D) Approving Form and Manner of Notice of Sale, Auction, and Sale Hearing, (E) Approving Assumption and Assignment Procedures and Form and Manner of Notice of Assumption and Assignment; and (II)(A) Authorizing Sale of Debtors Assets Free and Clear of Liens, Claims, Interests, and Encumbrances [Docket No. 13].

Related Filing:

Declaration of Glenn Tobias in Support of Debtor-In-Possession Financing Motion and Bidding Procedures and Sale Motion [Docket No. 15].