

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

	)	
In re:	)	Chapter 11
	)	
PGX HOLDINGS, INC., <i>et al.</i> , <sup>1</sup>	)	Case No. 23-10718 (CTG)
	)	
Debtors.	)	(Jointly Administered)
	)	<b>Re: Docket Nos. 17, 70, 153</b>

**DEBTORS’ WITNESS AND EXHIBIT LIST  
FOR HEARING SET FOR JULY 21, 2023, AT 10:30 A.M.**

**PLEASE TAKE NOTICE THAT** the above-captioned debtors and debtors in possession (collectively, the “Debtors”) hereby submit their witness and exhibit list in connection with the hearing currently scheduled to begin on July 21, 2023, at 10:30 a.m. (prevailing Eastern Time) (the “Hearing”).

**WITNESSES**

1. Chad Wallace, Chief Executive Officer of PGX Holdings, Inc. – to testify concerning the matters contained in the Declaration of Chad Wallace in Support of Debtors’ Chapter 11 Petitions and First Day Motions [Docket No. 12].
2. Neil A. Augustine, Vice Chairman and Co-Head of North American Financing Advisory and Restructuring at Greenhill & Co., LLC – to testify concerning the matters contained in the Declaration of Neil A. Augustine in Support of the Bid Procedures Motion [Docket No. 67], the Declaration of Neil A. Augustine in Support of the DIP Motion [Docket No. 17-1], the Declaration of Neil A. Augustine in Support of Debtors’ Application For Entry of Order (I) Authorizing the Employment and Retention of Greenhill & Co., LLC as Financial Advisor and Investment Banker to the Debtors and Debtors In Possession, Effective as of Petition Date, and (II) Granting Related Relief [Docket No. 124-3], and the Supplemental Declaration of Neil A. Augustine in Support of Debtors’ Application For Entry of Order (I)

<sup>1</sup> 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.



Authorizing the Employment and Retention of Greenhill & Co., LLC as Financial Advisor and Investment Banker to the Debtors and Debtors In Possession, Effective as of Petition Date, and (II) Granting Related Relief [TO BE FILED]

3. Roger Meltzer, Disinterested Director of the Lexington Law Firm – to testify concerning matters related to the DIP Motion and the Bid Procedures Motion that relate specifically to the Lexington Law Firm.
4. Any person called as a witness by another party.
5. Rebuttal witnesses as necessary.

**PLEASE TAKE FURTHER NOTICE THAT** the Debtors reserve all rights to amend, supplement, and modify the Witness List and Exhibit List and introduce into evidence (i) any exhibits listed by other parties, (ii) any documents for the purposes of rebuttal or impeachment, (iii) any documents subsequently filed, or (iv) any pleadings or other court filings. The Debtors further reserve the right to call any witness identified by any other party or for the purposes of rebuttal.

**EXHIBITS**

<b>Ex. No.</b>	<b>Document</b>	<b>Counsel Seeking to Admit Exhibit</b>
1.	Declaration of Chad Wallace, Chief Executive Officer of PGX Holdings, Inc., in Support of Debtors’ Chapter 11 Petitions and First Day Motions [Docket No. 11].	Kirkland & Ellis LLP

Ex. No.	Document	Counsel Seeking to Admit Exhibit
2.	Declaration of Neil A. Augustine in Support of the Debtors' Motion for Entry of Orders (I)(A) Approving Bidding Procedures for Substantially All of the Debtors' Assets, (B) Authorizing the Debtors to Enter Into One or More Stalking Horse Agreements and to Provide Bidding Protections Thereunder, (C) Scheduling an Auction and Approving the Form and Manner of Notice Thereof, (D) Approving Assumption and Assignment Procedures, and (E) Scheduling a Sale Hearing and Approving the Form and Manner of Notice Thereof; (II)(A) Approving the Sale of the Debtors' Assets Free and Clear of Liens, Claims, Interests and Encumbrances and (B) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases; and (III) Granting Related Relief [Docket No. 67].	Kirkland & Ellis LLP
3.	Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition and (B) Utilized Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granted Related Relief [Docket No. 17].	Kirkland & Ellis LLP
4.	Debtors' Application For Entry of Order (I) Authorizing the Employment and Retention of Greenhill & Co., LLC as Financial Advisor and Investment Banker to the Debtors and Debtors In Possession, Effective as of Petition Date, and (II) Granting Related Relief [Docket No. 124].	Kirkland & Ellis LLP and/or Klehr Harrison Harvey Branzburg LLP

Ex. No.	Document	Counsel Seeking to Admit Exhibit
5.	Supplemental Declaration of Neil A. Augustine in Support of Debtors' Application For Entry of Order (I) Authorizing the Employment and Retention of Greenhill & Co., LLC as Financial Advisor and Investment Banker to the Debtors and Debtors In Possession, Effective as of Petition Date, and (II) Granting Related Relief [TO BE FILED],	Kirkland & Ellis LLP and/or Klehr Harrison Harvey Branzburg LLP
6.	Motion of the Debtors for Entry of Orders (I)(A) Approving Bidding Procedures for Substantially All of the Debtors' Assets, (B) Authorizing the Debtors to Enter into One or More Stalking Horse Agreements and to Provide Bidding Protections Thereunder, (C) Scheduling an Auction and Approving the Form and Manner of Notice Thereof; (II)(A) Approving the Sale of the Debtors' Assets Free and Clear of Liens, Claims, Interests, and Encumbrances and (B) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases; and (III) Granting Related Relief [Docket No. 66].	Kirkland & Ellis LLP
7.	Any exhibits identified by any other party.	
8.	Any exhibits necessary for rebuttal or impeachment.	

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Dated: July 19, 2023  
Wilmington, Delaware

*/s/ Michael W. Yurkewicz*

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**KLEHR HARRISON HARVEY  
BRANZBURG LLP**

Domenic E. Pacitti (DE Bar No. 3989)  
Michael W. Yurkewicz (DE Bar No. 4165)  
919 North Market Street, Suite 1000  
Wilmington, Delaware 19801  
Telephone: (302) 426-1189  
Facsimile: (302) 426-9193  
Email: dpacitti@klehr.com  
myurkewicz@klehr.com

- and -

Morton R. Branzburg (admitted *pro hac vice*)  
1835 Market Street, Suite 1400  
Philadelphia, Pennsylvania 19103  
Telephone: (215) 569-3007  
Facsimile: (215) 568-6603  
Email: mbranzburg@klehr.com

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

**KIRKLAND & ELLIS LLP  
KIRKLAND & ELLIS INTERNATIONAL LLP**

Joshua A. Sussberg, P.C. (admitted *pro hac vice*)  
601 Lexington Ave  
New York, New York 10022  
Telephone: (212) 446-4800  
Facsimile: (212) 446-4900  
Email: joshua.sussberg@kirkland.com

- and -

Spencer Winters (admitted *pro hac vice*)  
Whitney C. Fogelberg (admitted *pro hac vice*)  
Alison J. Wirtz (admitted *pro hac vice*)  
300 North LaSalle  
Chicago, Illinois 60654  
Telephone: (312) 862-2000  
Facsimile: (312) 862-2200  
Email: spencer.winters@kirkland.com  
whitney.fogelberg@kirkland.com  
alison.wirtz@kirkland.com

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