

**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.)	(Jointly Administered)
)	
)	Related to: Docket Nos. 17, 66, and 124

**DEBTORS' WITNESS AND EXHIBIT LIST FOR
HEARING SCHEDULED FOR JULY 31, 2023, AT 1:00 P.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 31, 2023, at 1:00 p.m. (prevailing Eastern Time) (the "Hearing").

WITNESSES²

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 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

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 Pursuant to agreement between the Debtors and counsel for the Official Committee of Unsecured Creditors, witnesses' direct testimony may be presented, in whole or in part, via declaration.



as of Petition Date, and (II) Granting Related Relief [Docket No. 124], 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) 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

Ex. No.	Document	Counsel Seeking to Admit Exhibit
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.	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].	Kirkland & Ellis LLP and/or Klehr Harrison Harvey Branzburg LLP
6.	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
7.	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
8.	Notice of Revised Proposed Order Regarding Bidding Procedures Motion [Docket No. 192].	Kirkland & Ellis LLP
9.	Any exhibits identified by any other party.	Kirkland & Ellis LLP
10.	Any exhibits necessary for rebuttal or impeachment.	Kirkland & Ellis LLP

Dated: July 27, 2023
Wilmington, Delaware

/s/ Domenic E. Pacitti

**KLEHR HARRISON HARVEY
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