

**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)
)	Re: Docket Nos. 66, 233

**DEBTORS’ WITNESS AND EXHIBIT LIST
FOR HEARING SET FOR AUGUST 25, 2023, AT 10:00 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 August 25, 2023, at 10:00 a.m. (prevailing Eastern Time) (the “Hearing”).

WITNESSES

1. Chad Wallace, Chief Executive Officer of PGX Holdings, Inc. – to testify concerning the reasons for approving the sale with respect to the PGX Debtors and regarding the CFPB’s Motion to Convert.
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] and the Supplemental Declaration of Neil A. Augustine in Support of the Sale Motion [Docket No. 392].
3. Roger Meltzer, Disinterested Director of the Lexington Law Firm – to testify concerning the reasons for approving the sale with respect to the Lexington Law Firm and regarding the CFPB’s Motion to Convert.
4. Any person called as a witness by another party.

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.



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
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

Ex. No.	Document	Counsel Seeking to Admit Exhibit
3.	Declaration of Neil A. Augustine In Support of the (I) Reply of Debtors in Support of the Proposed Sale Transactions and (II) Debtors' Objection to the Motion of the United States of America to Convert Chapter 11 Cases to Chapter 7 [Dkt. No. 392].	Kirkland & Ellis LLP
4.	Debtors' Objection to Motion of the United States of America to Convert Chapter 11 Cases to Chapter 7 [Docket No. 369].	Kirkland & Ellis LLP
5.	June 7, 2023 Order Denying Plaintiff's Motion for Relief in <i>CFPB v. Progexion Marketing, Inc., et al.</i> , Case No. 2:19-cv-00298 (D. Utah) [Dkt. No. 574].	Kirkland & Ellis LLP
6.	March 10, 2023 Order Granting Plaintiff's Motion for Partial Summary Judgment in <i>CFPB v. Progexion Marketing, Inc., et al.</i> , Case No. 2:19-cv-00298 (D. Utah) [Dkt. No. 508].	Kirkland & Ellis LLP
7.	June 1, 2023 Transcript of Hearing in <i>CFPB v. Progexion Marketing, Inc., et al.</i> , Case No. 2:19-cv-00298 (D. Utah).	Kirkland & Ellis LLP
8.	June 2, 2023 Transcript of Hearing in <i>CFPB v. Progexion Marketing, Inc., et al.</i> , Case No. 2:19-cv-00298 (D. Utah).	Kirkland & Ellis LLP
9.	July 10, 2023 Transcript of Hearing in <i>CFPB v. Progexion Marketing, Inc., et al.</i> , Case No. 2:19-cv-00298 (D. Utah).	Kirkland & Ellis LLP
10.	July 11, 2023 Transcript of Hearing in <i>CFPB v. Progexion Marketing, Inc., et al.</i> , Case No. 2:19-cv-00298 (D. Utah).	Kirkland & Ellis LLP
11.	Weekly KPI Report, PGX_DEBTORS-0006532	Kirkland & Ellis LLP
12.	Pretzel – Monthly Model – 2023.06.05, PGX_DEBTORS-0006511	Kirkland & Ellis LLP

Ex. No.	Document	Counsel Seeking to Admit Exhibit
13.	Order (I)(A) Approving Bidding Procedures for the Sale of 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 Relating Relief [Docket No. 331].	Kirkland & Ellis LLP
14.	Notice of (I) Cancellation of Auction and (II) Filing of Proposed Sale Order [Docket No. 356].	Kirkland & Ellis LLP
15.	Any exhibits identified by any other party.	Kirkland & Ellis LLP
16.	Any exhibits necessary for rebuttal or impeachment.	Kirkland & Ellis LLP

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Dated: August 23, 2023
Wilmington, Delaware

/s/ Michael W. Yurkewicz

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