

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

	)	
In re:	)	Chapter 11
	)	
PGX HOLDINGS, INC, et al., <sup>1</sup>	)	Case No. 23-10718 (CTG)
	)	
Debtors.	)	(Jointly Administered)
	)	Related to Docket Nos. 5, 6, 7, 8, 9, 10, 11, 13, 14,
	)	15, 16, and 17

**OMNIBUS NOTICE OF SECOND DAY HEARING  
TO BE HELD ON JUNE 28, 2023 AT 2:00 P.M. (ET)**

**PLEASE TAKE NOTICE** that on June 4, 2023 (the “Petition Date”), the above captioned debtors (collectively, the “Debtors”) each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the District of Delaware.

**PLEASE TAKE FURTHER NOTICE** that the following motions (collectively, the “Interim/Final Relief Motions”) were approved on an interim basis and will be heard on a final basis at a hearing scheduled for **June 28, 2023 at 2:00 p.m. (Prevailing Eastern Time)** (the “Second Day Hearing”) before the Honorable Craig T. Goldblatt at the United States Bankruptcy Court for the District of Delaware (the “Court”), 824 N. Market Street, 3<sup>rd</sup> Floor, Courtroom #7, Wilmington, Delaware 19801:

1. **DIP/Cash Collateral Motion.** Motion of Debtors Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (IV) Granting Related Relief [Docket No. 17; Filed 6/5/2023]

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<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.



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2. **Cash Management Motion.** Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate the Cash Management Systems, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, (D) Continue to Perform Intercompany Transactions, and (II) Granting Related Relief [Docket No. 5; Filed 6/4/2023]
3. **Wages Motion.** Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue Employee Benefits Programs, and (II) Granting Related Relief [Docket No. 6; Filed 6/4/2023]
4. **Critical Vendors Motion.** Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Claims of Critical Vendors and (II) Granting Related Relief [Docket No. 11; Filed 6/4/2023]
5. **Customer Programs Motion.** Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Maintain and Administer Their Existing Customer Programs and Honor Certain Prepetition Obligations Related Thereto and (II) Granting Related Relief [Docket No. 7; Filed 6/4/2023]
6. **NOL Motion.** Motion of Debtors for Entry of Interim and Final Orders (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness With Respect to Common Stock and (II) Granting Related Relief [Docket No. 16; Filed 6/5/2023]
7. **Taxes Motion.** Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Payment of Certain Prepetition and Postpetition Taxes and Fees and (II) Granting Related Relief [Docket No. 8; Filed 6/4/2023]
8. **Utilities Motion.** Motion of Debtors for Entry of Interim and Final Orders (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Approving the Debtors' Proposed Procedures for Resolving Additional Assurance Requests, (III) Prohibiting Utility Providers from Altering, Refusing or Discontinuing Services, and (IV) Granting Related Relief [Docket No. 9; Filed 6/4/2023]
9. **Creditor Matrix Motion.** Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) File a Consolidated List of Creditors in Lieu of Submitting a Separate Mailing Matrix for Each Debtor, (B) File a Consolidated List of the Debtors' Thirty Largest Unsecured Creditors, (C) Serve Certain Parties in Interest by Email, (D) Approve the Form and Manner of Service of the Notice of Commencement, (E) Redact or Withhold Certain Confidential Information, and (F) Redact Certain Personally Identifiable Information and (II) Granting Related Relief [Docket No. 14; Filed 6/5/2023]

10. **Section 156(c) Retention Application.** Application of the Debtors for Authorization to Employ and Retain Kurtzman Carson Consultants LLC as Claims and Noticing Agent Effective as of Petition Date [Docket No. 4; Filed 6/4/2023]
11. **Insurance Motion.** Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Maintain Insurance and Surety Coverage Entered Into Prepetition and Pay Related Prepetition Obligations, and (B) Renew, Supplement, Modify, or Purchase Insurance and Surety Coverage, and (II) Granting Related Relief [Docket No. 13; Filed 6/5/2023]

**PLEASE TAKE FURTHER NOTICE** that on June 4, 2023 the Debtors also filed the First Omnibus Motion of Debtors for Entry of an Order (I) Authorizing the Rejection of Certain Unexpired Leases and Executory Contracts, (II) Authorizing Abandonment of Certain Personal Property, Each Effective as of the Petition Date, and (III) Granting Related Relief [Docket no. 10; Filed 6/4/2023] (the “Rejection Motion”).

**PLEASE TAKE FURTHER NOTICE** that the Rejection Motion will be heard at the Second Day Hearing.

**PLEASE TAKE FURTHER NOTICE** that on June 5, 2023 the Debtors also filed the Motion of Debtors for Entry of an Order (I) Extending Time to File Schedules of Assets and Liabilities, Schedules of Current Income and Expenditures, Schedules of Executory Contracts and Unexpired Leases, Statements of Financial Affairs, and Rule 2015.3 Financial Reports and (II) Granting Related Relief [Docket No. 15; Filed 6/5/2023] (the “Schedules and SOFA Extension Motion”).

**PLEASE TAKE FURTHER NOTICE** that the Schedules and SOFA Extension Motion will be heard at the Second Day Hearing.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Interim/Final Relief Motions, the Rejection Motion, and the Schedules and SOFA Extension Motion must comply with the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the District of Delaware. Objections, if any, to the Interim/Final Relief Motions must be served upon each of the parties set forth below **on or before June 21, 2023 by 4:00 p.m. (Prevailing Eastern Time)**: (a) counsel for the Debtors, (i) Kirkland & Ellis LLP, 300 North LaSalle, Chicago, Illinois 60654 (Attn: Spencer Winters (spencer.winters@kirkland.com); Whitney Fogelberg (whitney.fogelberg@kirkland.com); and Alison J. Wirtz (alison.wirtz@kirkland.com)) and (ii) Klehr Harrison Harvey Branzburg LLP, 919 N. Market Street, Suite 1000, Wilmington, DE 19801 (Attn: Domenic E. Pacitti (dpacitti@klehr.com) and Michael W. Yurkewicz (myurkewicz@klehr.com)); (b) counsel for the Prepetition First Lien Lenders and DIP Lenders, (i) King & Spalding, 1185 Avenue of the Americas, New York, NY 10036 (Attn: Roger Schwartz, Esq. (rschwartz@kslaw.com); Geoffrey Michael King, Esq. (gking&kslaw.com) and Timothy Fesenmyer, Esq. (tfesenmyer@kslaw.com); and (ii) Morris, Nichols, Arsht & Tunnell LLP, 1201 N. Market Street, Suite 1600, Wilmington, Delaware 19801, (Attn: Robert J. Dehney (rdehney@morrisnichols.com)) (c) the Office of The United States Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801, Attn: Jane Leamy (Jane.Leamy @usdoj.gov); and (d) counsel to any statutory committee appointed in these chapter 11 cases.

**PLEASE TAKE FURTHER NOTICE** that copies of the Interim/Final Relief Motions and SOFA Extension Motion can be viewed on the Court's website at <https://ecf.deb.uscourts.gov> and on the website of the Debtors' claims agent, Kurtzman Carson Consultants LLC ("KCC"), at <https://www.kcellc.net/pgx>. Further information may be obtained by calling KCC at: (888) 249-2721 (toll-free; domestic) or (310) 751-2604 (international) or emailing at [PGXHoldingsInfo@kcellc.com](mailto:PGXHoldingsInfo@kcellc.com).

**PLEASE TAKE FURTHER NOTICE** that the Second Day Hearing may be continued or adjourned thereafter from time to time without further notice other than an announcement of the adjourned date or dates at the Second Day Hearing or at a later hearing. The Debtors will file an agenda before the Second Day Hearing, which may modify or supplement the motions and applications to be heard at the Second Day Hearing.

**PLEASE TAKE FURTHER NOTICE** that you need not appear at the hearing if you do not object to the relief requested in any of the Interim/Final Relief Motions, the Rejection Motion, or the Schedules and SOFA Extension Motion.

**PLEASE TAKE FURTHER NOTICE THAT IF YOU DO NOT WANT THE COURT TO GRANT THE RELIEF REQUESTED IN THE INTERIM/FINAL RELIEF MOTIONS, OR IF YOU WANT THE COURT TO CONSIDER YOUR VIEW ON THE INTERIM/FINAL RELIEF MOTIONS, THEN YOU OR YOUR ATTORNEY MUST ATTEND THE SECOND DAY HEARING. IF YOU OR YOUR ATTORNEY DO NOT TAKE THESE STEPS, THE COURT MAY DECIDE THAT YOU DO NOT OPPOSE THE RELIEF SOUGHT IN THE INTERIM/FINAL RELIEF MOTIONS AND MAY ENTER ORDERS GRANTING THE RELIEF REQUESTED IN THE INTERIM/FINAL RELIEF MOTIONS.**

Dated: June 7, 2023  
Wilmington, Delaware

*/s/ Michael W. Yurkewicz*

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