

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

In re:

QLESS, INC.,

Debtor.¹

Chapter 11, Subchapter V

Case No. 24-11395 (BLS)

Hearing Date: June 21, 2024 at 11:00 A.M. (ET)

NOTICE OF HEARING² ON FIRST DAY MOTIONS

PLEASE TAKE NOTICE that on June 19, 2024 (the “**Petition Date**”), the above-captioned debtor and debtor in possession (the “**Debtor**”) filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “**Bankruptcy Code**”), with the Clerk of the United States Bankruptcy Court for the District of Delaware. The Debtor is continuing to operate its business and manage its affairs as a debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE that together with its chapter 11 petition, the Debtor also filed the following applications and motions set forth below (collectively, the “**First Day Motions**”). A hearing to consider the First Day Motions (the “**First Day Hearing**”) will be held on **June 11, 2024, at 11:00 A.M. (Eastern Time)** by video conference only, before the Honorable Brendan L. Shannon at the United States Bankruptcy Court for the District of Delaware (the “**Court**”), located at 824 North Market Street, 6th Floor, Wilmington, Delaware 19801.

¹ The Debtor’s principal place of business and service address is 21 Miller Alley, Suite 210, Pasadena CA 91105.

² Any party who wishes to attend the video conference is required to register at the following link:

<https://ecf.deb.uscourts.gov/cgi-bin/nysbAppearances.pl>.



1. Petition of Qless, Inc. (Dkt No. 1)
2. Declaration of James Harvey in Support of Chapter 11 Petition and First Day Relief (Dkt. No. 9)

First Day Administrative Motion

3. Debtor's Application for Authorization to Employ and Retain Kurtzman Carson Consultants, LLC dba Verita Global as Claims and Noticing Agent Effective as of the Petition Date (Dkt. No. 3)

First Day Motions Pertaining to Business Operations

4. Debtor's Motion for Entry of Interim and Final Orders: (I) Authorizing the Payment of Certain Taxes and Fees; and (II) Granting Related Relief (Dkt. No. 4)
5. Debtor's Motion for Interim and Final Orders (I) Authorizing, But Not Directing, the Debtor to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses and (B) Continue Employee Benefits Programs and (II) Granting Related Relief (Dkt. No. 5)
6. Debtor's Motion for Interim and Final Orders Authorizing: (I) Maintenance of Existing Bank Accounts; and (II) Continuance of Existing Cash Management System (Dkt. No. 6)

First Day Motion Pertaining to Financing

7. Emergency Motion of the Debtor For Interim and Final Orders (I) Authorizing and Approving Debtor to (A) Obtain Debtor in Possession Financing on a Junior Secured Basis and (B) Use Cash Collateral of Pre-Petition Secured Lender; (II) Scheduling a Final Hearing; and (III) Granting Related Relief (Dkt. No. 7)
8. Declaration of Andrew De Camara of Sherwood Partners, Inc. in Support of Emergency Motion of the Debtor For Interim and Final Orders (I) Authorizing and Approving Debtor to (A) Obtain Debtor in Possession Financing on a Junior Secured Basis and (B) Use Cash Collateral of Pre-Petition Secured Lender; (II) Scheduling a Final Hearing; and (III) Granting Related Relief (Dkt. No. 8)

PLEASE TAKE FURTHER NOTICE that copies of the First Day Motions can be obtained for a fee through the Court's website at www.deb.uscourts.gov, referencing Case No. 2411395 (BLS), or may be obtained for free by accessing the Debtor's restructuring website at <http://www.veritaglobal.net/QLess>.

PLEASE TAKE FURTHER NOTICE that any and all objections to the First Day Motions may be made at the First Day Hearing.

Dated: June 20, 2024

PACHULSKI STANG ZIEHL & JONES LLP

/s/James E. O'Neill

James E. O'Neill (DE Bar No. 4042)
Jeffrey N. Pomerantz (*pro hac vice* forthcoming)
Jordan A. Kroop (*pro hac vice* forthcoming)
Maxim B. Litvak (*pro hac vice* forthcoming)
Greg V. Demo (*pro hac vice* forthcoming)
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, Delaware 19899 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: joneill@pszjlaw.com
jpomerantz@pszjlaw.com
jkroop@pszjlaw.com
mlitvak@pszjlaw.com
gdemo@pszjlaw.com

Proposed Counsel to the Debtor and Debtor in Possession