

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)

AMENDED NOTICE OF AGENDA OF FIRST DAY MATTERS SCHEDULED FOR
HYBRID HEARING ON JUNE 21, 2024 AT 11:00 A.M. (EASTERN TIME)
BEFORE THE HONORABLE BRENDAN L. SHANNON

This hybrid hearing will be conducted in person and utilizing Zoom. All remote participants are required to register in advance using the *eCourt Appearances* tool available on the Court's website (<http://www.deb.uscourts.gov/ecourt-appearances>).

Delaware counsel must appear in person at the hearing and all other parties are permitted to appear in person or via Zoom.

1. Voluntary Petition:

A. Qless, Inc. Case No. 24-11395 () [Filed June 19, 2024, [Docket No. 1](#)]

First Day Declaration

2. *Declaration of James Harvey in Support of Chapter 11 Petition and First Day Relief*
[Filed June 19, 2024, [Docket No. 9](#)]

Status: The Debtor will ask the Court to admit the declaration into evidence. To the extent the Court or any party in interest have questions regarding the declaration or the factual bases for the first-day relief the Debtor seeks, the declarant will be available via Zoom videoconference.

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



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* [Filed June 19, [Docket No. 3](#)].

Status: This matter is going forward.

First Day Motions Pertaining to 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* [Filed June 19, 2024, [Docket No. 4](#)]

Status: This matter is going forward with respect to an interim order.

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* [Filed June 19, 2024, [Docket No. 5](#)]

Status: This matter is going forward with respect to an interim order.

6. *Debtor's Motion for Interim and Final Orders Authorizing: (I) Maintenance of Existing Bank Accounts; and (II) Continuance of Existing Cash Management System* [Filed June 19, 2024, [Docket No. 6](#)]

Status: This matter is going forward with respect to an interim order.

DIP Financing Motion

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* [Filed June 19, 2024, [Docket No. 7](#)]

Related Documents:

- A. *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* [Filed June 19, 2024, [Docket No. 8](#)]

Status: This matter is going forward with respect to an interim order. The Debtor will ask the Court to admit the declaration into evidence. To the extent the Court or any party

in interest have questions regarding the declaration or the factual bases for the first-day relief the Debtor seeks, the declarant will be available via Zoom videoconference.

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)

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