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

In re:

QLESS, INC.,

Debtor.<sup>1</sup>

Chapter 11, Subchapter V

Case No. 24-11395 (BLS)

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

#### AMENDED NOTICE OF *HYBRID* HEARING<sup>2</sup> ON FIRST DAY MOTIONS

**PLEASE TAKE NOTICE** that on June 19, 2024 (the "**Petition Date**"), the abovecaptioned 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 hybrid hearing to consider the First Day Motions (the "First Day Hearing") will be held on June 21, 2024, at 11:00 A.M. (Eastern Time) both in person for Delaware counsel and by video conference for all other parties, before the Honorable Brendan L. Shannon at the United States Bankruptcy Court for the District of Delaware (the "<u>Court</u>"), located at 824 North Market Street, 6<sup>th</sup> Floor, Courtroom #1, Wilmington, Delaware 19801.



<sup>&</sup>lt;sup>1</sup> The Debtor's principal place of business and service address is 21 Miller Alley, Suite 210, Pasadena CA 91105.

<sup>&</sup>lt;sup>2</sup> Any party who wishes to attend the video conference is required to register at the following link: <u>http://www.deb.uscourts.gov/ecourt-appearances</u>.

- 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

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