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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)

NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING ON AUGUST 27, 2024 AT 2:00 P.M. (EASTERN TIME) BEFORE THE HONORABLE BRENDAN L. SHANNON

This proceeding will be conducted in person.

The hearing will be held on the 6th Floor in Courtroom No. 1.

Please refer to Judge Shannon's Chambers Procedures (https://www.deb.uscourts.gov/judge-brendan-l-shannon) and the Court's website (http://www.deb.uscourts.gov/ecourt-appearances) for information on the method of allowed participation (video or audio), Judge Shannon's expectations of remote participants, and the advance registration requirements. Registration is required by onehour prior to the hearing unless otherwise noticed using the eCourtAppearances tool available on the Court's website.

CONTESTED MATTER

1. Amended Plan [Filed 8/21/24, Docket No. 122]

<u>Response Deadline</u>: August 21, 2024 at 5:00 p.m. (prevailing Eastern Time)

Responses Received:

 (a) Objection of Alex Backer and Certain Preferred Shareholders to Debtors Subchapter V Eligibility and Plan [Filed August 21, 2024, <u>Docket No. 118]</u>

Related Documents:

(a) Notice of Filing Plan Exhibit [Filed 8/17/24, Docket 105]

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



(b) Plan [Filed 7/19/24, <u>Docket No. 70</u>]

(c) Brief in Support of Plan Confirmation and related Declarations [To be filed]

Replies:

 (a) Statement of Celtic Bank Corporation in Response to Objection of Alex Backer and Certain Preferred Shareholders to Debtor's Subchapter V Eligibility and Plan [Filed 8/23/24, <u>Docket No. 126</u>]

<u>Status</u>: The hearing on this matter is going forward.

2. Motion for Entry of An Order Pursuant to Rule 3018(a) of the Federal Rules of Bankruptcy Procedure for Temporarily Allowance of Claims for Purposes of Voting to Accept or Reject the Debtor's Plan [Filed 8/22/24, <u>Docket No. 123</u>]

Response Deadline: TBD

Responses Received:

(a) [To be filed]

Related Documents:

 Motion for Expedited Consideration and to Shorten Notice on Motion for Entry of An Order Pursuant to Rule 3018(a) of the Federal Rules of Bankruptcy Procedure for Temporarily Allowance of Claims for Purposes of Voting to Accept or Reject the Debtor's Plan [Filed 8/22/24, <u>Docket No. 124</u>]

Status: The Debtor will file its response to the 3018 Motion on 8/23/24.

3. Motion to Continue Confirmation Hearing [Filed 8/23/24, Docket No. 125]

Response Deadline: TBD

Responses Received:

- (a) [To be filed]
- Status: The Debtor opposes the Motion to Continue and will file its response on 8/23/24.

Dated: August 23, 2024

PACHULSKI STANG ZIEHL & JONES LLP

<u>/s/ James E. O'Neill</u> James E. O'Neill (DE Bar No. 4042) Jeffrey N. Pomerantz (admitted *pro hac vice*) Jordan A. Kroop (admitted *pro hac vice*) Hayley R. Winograd (admitted *pro hac vice*) 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

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