

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

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In re: : Chapter 11
:
THE CONTAINER STORE GROUP, INC., *et al.*, : Case No. 24-90627 (ARP)
:
Debtors.¹ : (Joint Administration Requested)
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NOTICE OF EMERGENCY VIRTUAL HEARING ON FIRST DAY MOTIONS

PLEASE TAKE NOTICE that on December 22, 2024 (the “*Petition Date*”), The Container Store Group, Inc. and its affiliated debtors and debtors-in-possession (collectively, the “*Debtors*”) filed voluntary petitions for relief under title 11 of the United States Code (the “*Bankruptcy Code*”) in the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the “*Court*”) commencing these chapter 11 cases (the “*Chapter 11 Cases*”).

PLEASE TAKE FURTHER NOTICE that in accordance with the Procedures for Complex Cases in the Southern District of Texas, an emergency, virtual hearing is set for **December 23, 2024 at 1:00 p.m. (Prevailing Central Time)** (the “*First Day Hearing*”), before the Honorable Alfredo R. Perez to consider the matters (collectively, the “*First Day Motions*”) set forth below.

PLEASE TAKE FURTHER NOTICE that the First Day Hearing will be conducted **virtually only. No in-person attendance will be permitted.** Audio communication will be by use of the Court’s dial-in-facility. You may access the facility at (832) 917-1510. Once connected, you will be asked to enter the conference room number. Judge Perez’s conference room number is 282694. Video communication will be by the use of the GoToMeeting platform. Connect via the free GoToMeeting application or click the link on Judge Perez’s home page. The meeting code is “JudgePerez”. Click the settings icon in the upper right corner and enter your name under the personal information setting.

PLEASE TAKE FURTHER NOTICE that hearing appearances must be made electronically in advance of the hearing. To make your electronic appearance, click the “Electronic Appearance” link on Judge Perez’s home page. Select the case name, complete the required fields and click “Submit” to complete your appearance.

¹ The Debtors in these cases, together with the last four digits of each Debtor’s taxpayer identification number, are: The Container Store Group, Inc. (5401); The Container Store, Inc. (6981); C Studio Manufacturing Inc. (4763); C Studio Manufacturing LLC (5770); and TCS Gift Card Services, LLC (7975). The Debtors’ mailing address is 500 Freeport Parkway, Coppel, TX 75019.



PLEASE TAKE FURTHER NOTICE that all documents filed in these Chapter 11 Cases, including the First Day Motions, and other relevant case information are available free of charge on the following website maintained by the Debtors' proposed claims, balloting, and noticing agent, Kurtzman Carson Consultants LLC d/b/a Verita Global, in connection with the Chapter 11 Cases: <https://veritaglobal.net/thecontainerstore>. Copies of any pleadings or papers filed with the Court may also be obtained by visiting the Court's website at <https://ecf.txsb.uscourts.gov> in accordance with the procedures and fees set forth therein.

First Day Motions:

1. ***Joint Administration Motion.*** Emergency Motion of Debtors for Entry of an Order Directing Joint Administration of Chapter 11 Cases [Docket No. 2]
2. ***Complex Case Designation.*** Notice of Designation as Complex Bankruptcy Case [Docket No. 3]
3. ***Claims, Noticing, and Solicitation Agent Retention Application.*** Emergency *Ex Parte* Application for Entry of an Order Authorizing the Employment and Retention of Kurtzman Carson Consultants, LLC d/b/a Verita Global as Claims, Noticing, and Solicitation Agent [Docket No. 4]
4. ***Cash Management Motion.*** Emergency Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate their Existing Cash Management System, Including Maintenance of Existing Bank Accounts, Checks, and Business Forms, (B) Maintain Existing Deposit Practices, and (C) Perform Intercompany Transactions; (II) Waiving Certain U.S. Trustee Guidelines; and (III) Granting Related Relief [Docket No. 9]
5. ***Creditor Matrix Motion.*** Emergency Motion of Debtors for Entry of an Order (I) Authorizing the Debtors to File a Consolidated Creditor Matrix and List of the 30 Largest Unsecured Creditors; (II) Waiving the Requirement to File a List of Equity Security Holders; (III) Authorizing the Debtors to Redact Certain Personally Identifiable Information; and (IV) Granting Related Relief [Docket No. 5]
6. ***Utilities Motion.*** Emergency Motion of Debtors for Entry of an Order (I) Prohibiting Utilities from Altering, Refusing, or Discontinuing Service, (II) Approving the Debtors' Proposed Form of Adequate Assurance of Payment to Utilities, (III) Establishing Procedures for Resolving Requests for Additional Adequate Assurance, and (IV) Granting Related Relief [Docket No. 10]
7. ***Wages Motion.*** Emergency Motion of Debtors for Entry of an Order (I) Authorizing the Debtors to (A) Pay Certain Employee Compensation and Benefits, (B) Maintain and Continue Such Benefits and Other Employee-Related Programs, and (C) Pay Prepetition Claims of Contracted Labor; (II) Granting Relief from Automatic Stay with Respect to Workers' Compensation Claims; and (III) Granting Related Relief [Docket No. 11]
8. ***Insurance Motion.*** Emergency Motion of Debtors for Entry of an Order (I) Authorizing the Debtors to (A) Pay Prepetition Insurance Program Obligations, (B) Maintain the

Insurance Programs Postpetition, (C) Maintain the Bonding Program and Honor Related Obligations, and (D) Honor Letters of Credit; and (II) Granting Related Relief [Docket No. 12]

9. **Taxes Motion.** Emergency Motion of Debtors for Entry of an Order (I) Authorizing the Debtors to Pay Certain Prepetition Taxes and Fees and (II) Granting Related Relief [Docket No. 13]
10. **Customer Programs Motion.** Emergency Motion of Debtors for Entry of an Order (I) Authorizing the Debtors to (A) Honor Prepetition Obligations to Customers and (B) Continue Customer Programs and (II) Granting Related Relief [Docket No. 14]
11. **NOL Motion.** Emergency Motion of Debtors for Entry of an Order Establishing Notification Procedures and Approving Restrictions on (A) Certain Transfers of Interests in Debtors and (B) Claims of Certain Worthless Stock Deductions [Docket No. 15]
12. **All Trade Motion.** Emergency Motion of Debtors for Entry of an Order (I) Authorizing the Debtors to Pay Prepetition Trade Claims in the Ordinary Course of Business and (II) Granting Related Relief [Docket No. 16]
13. **Solicitation Procedures Motion.** Emergency Motion of Debtors for Entry of Order (I) Scheduling Combined Hearing to Consider (A) Final Approval of Disclosure Statement, (B) Approval of Solicitation Procedures and Form of Ballot, and (C) Confirmation of Plan; (II) Establishing an Objection Deadline to Object to Disclosure Statement and Plan; (III) Approving the Form and Manner of Notice of Combined Hearing, Objection Deadline, and Notice of Commencement; (IV) Approving Notice and Objection Procedures for the Assumption or Rejection of Executory Contracts and Unexpired Leases; (V) Conditionally Waiving Requirement of Filing Schedules of Assets and Liabilities, Statements of Financial Affairs, and 2015.3 Reports; (VI) Conditionally Waiving Requirement to Convene the Section 341 Meeting of Creditors; (VII) Conditionally Approving the Disclosure Statement and (VIII) Granting Related Relief [Docket No. 17]
14. **DIP Motion.** Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral; (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status; (III) Granting Adequate Protection to the Prepetition Secured Parties; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing; and (VI) Granting Related Relief [Docket No. 7]

Related Documents:

1. **Disclosure Statement.** Disclosure Statement for Prepackaged Joint Plan of Reorganization of The Container Store Group, Inc. and its Debtor Affiliates under Chapter 11 of the Bankruptcy Code [Docket No. 18]
2. **Plan.** Prepackaged Joint Plan of Reorganization of The Container Store Group, Inc. and its Debtor Affiliates under Chapter 11 of the Bankruptcy Code [Docket No. 19]

3. ***First Day Declaration.*** Declaration of Chad E. Coben, Chief Restructuring Officer, in Support of the Chapter 11 Petitions and First Day Motions [Docket No. 6]
4. ***DIP Financing Declaration.*** Declaration of Adam L. Dunayer in Support of Debtors' DIP Motion [Docket No. 8]
5. ***Debtors' Witness and Exhibit List*** [Docket No. 26]

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Dated: December 23, 2024
Houston, Texas

Respectfully submitted,

/s/ Timothy A. ("Tad") Davidson II

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*Proposed Co-Counsel for the Debtors and
Debtors in Possession*

CERTIFICATE OF SERVICE

I certify that on December 23, 2024, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on those parties registered to receive electronic notices.

/s/ Timothy A. ("Tad") Davidson II
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