



Employee Expenses and (B) Continue Employee Benefits Programs; and (II) Granting Related Relief [D.I. 8]

5. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Granting Adequate Protection, (IV) Modifying the Automatic Stay, (V) Scheduling a Final Hearing, and (VI) Granting Related Relief [D.I. 9]

**PLEASE TAKE FURTHER NOTICE** that a hearing on the First Day Motions and certain other pleadings was held on March 18, 2025 (the “First Day Hearing”), at which time the Court approved the First Day Motions identified above on an interim basis. *See* Docket Nos. 62, 63, 64, 67, & 69.

**PLEASE TAKE FURTHER NOTICE** that any responses or objections to final approval of the First Day Motions must be in writing, filed with the Clerk of the Court, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801, and served upon the following parties on or before **April 3, 2025 at 4:00 p.m. (ET)** (the “Objection Deadline”): (i) proposed co-counsel for the Debtors, (a) Sheppard, Mullin, Richter & Hampton LLP, 321 North Clark Street, 32nd Floor, Chicago, Illinois 60654, Attn.: Justin Bernbrock (jbernbrock@sheppardmullin.com), and (b) Young, Conaway, Stargatt & Taylor LLP, Rodney Square, 1000 North King Street, Wilmington, Delaware 19801, Attn.: Joseph M. Mulvihill (jmulvihill@ycst.com); (ii) counsel for the DIP Secured Parties, (a) Morrison & Foerster LLP, 250 West 55th Street, Floor 20, New York, NY 10019, Attn: James A. Newton, Esq. (jnewton@mofo.com) and Miranda K. Russell, Esq. (mrussell@mofo.com) and (b) Potter Anderson & Corroon LLP, Hercules Plaza 1313 North Market Street, 6th Floor P.O. Box 951 Wilmington, DE 19801 (csamis@potteranderson.com); (iii) counsel for the Prepetition ABS Parties, Barnes & Thornburg LLP, One North Wacker Drive, Suite 4400, Chicago, IL 60606 (agavant@btlaw.com); (iii) counsel to the Committee, if any; and (iv) the U.S. Trustee, Attn: Rosa Sierra-Fox, Esq. (rosa.sierra-fox@usdoj.gov).

**PLEASE TAKE FURTHER NOTICE THAT A HEARING ON FINAL APPROVAL OF THE FIRST DAY MOTIONS WILL BE HELD ON APRIL 11, 2025 2024 at 1:30 P.M. (ET) BEFORE THE HONORABLE THOMAS M. HORAN, UNITED STATES BANKRUPTCY JUDGE, 824 N. MARKET STREET, 5TH FLOOR, COURTROOM NO. 5, WILMINGTON, DELAWARE 19801.**<sup>3</sup>

**PLEASE TAKE FURTHER NOTICE** that copies of the First Day Motions, any of the related interim orders, and all other pleadings filed in these chapter 11 cases are available, free of charge, from the website of the Court-appointed claims agent at <https://www.veritaglobal.net/vreg>.

**IF NO OBJECTIONS TO ANY OF THE FIRST DAY MOTIONS ARE TIMELY FILED, SERVED, AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN CONNECTION WITH SUCH FIRST DAY MOTIONS WITHOUT FURTHER NOTICE OR HEARING.**

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<sup>3</sup> To the extent that the hearing occurs virtually or on a hybrid basis, participation instructions will be provided in the agenda filed on the docket prior to the hearing.

Dated: March 19, 2025  
Wilmington, Delaware

*/s/ Joseph M. Mulvihill*

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