

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

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 :
In re : **Chapter 11**
 :
24 HOUR FITNESS : **Case No. 20-11558 (KBO)**
WORLDWIDE, INC., et al., :
 : **(Jointly Administered)**
Debtors.¹ :
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**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
TELEPHONIC HEARING ON AUGUST 24, 2020 AT 1:00 P.M. (EASTERN TIME)**²

This hearing will be held telephonically via CourtCall and, in certain circumstances, by video via Zoom. All parties wishing to appear must do so telephonically by contacting CourtCall, LLC at 866-582-6878. Only those parties that will be addressing the Court should appear by video via Zoom in addition to their CourtCall registration.

PLEASE NOTE THAT THE MICROPHONES ON THE ZOOM MEETING WILL BE MUTED AND THE ONLY AUDIO WILL BE THROUGH COURTCALL.

**Topic: 24 Hour Fitness Worldwide, Inc., 20-11558-KBO
Time: August 24, 2020 1:00 PM Eastern Time (US and Canada)**

Join ZoomGov Meeting:
<https://debuscourts.zoomgov.com/j/1612287935>

**Meeting ID: 161 228 7935
Password: 212887**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are 24 Hour Holdings II LLC (N/A); 24 Hour Fitness Worldwide, Inc. (5690); 24 Hour Fitness United States, Inc. (8376); 24 Hour Fitness USA, Inc. (9899); 24 Hour Fitness Holdings LLC (8902); 24 San Francisco LLC (3542); 24 New York LLC (7033); 24 Denver LLC (6644); RS FIT Holdings LLC (3064); RS FIT CA LLC (7007); and RS FIT NW LLC (9372). The Debtors’ corporate headquarters and service address is 12647 Alcosta Blvd., Suite 500, San Ramon, CA 94583.

² This agenda contains hyperlinks to filed documents pursuant to the Court’s Interim Order re: Cessation of Hand Deliveries, dated March 13, 2020. Parties may access the filed documents through the hyperlink for a fee through the Court’s website at www.deb.uscourts.gov, referencing Case No. 20-11558 (KBO), or the documents may be obtained for free by accessing the Debtors’ restructuring website at <https://restructuring.primeclerk.com/24hourfitness>.

RESOLVED MATTERS

1. **Cooley Retention Application** – Application of the Official Committee of Unsecured Creditors of 24 Hour Fitness Worldwide, Inc., et al., for Entry of an Order Authorizing the Employment and Retention of Cooley LLP as Lead Counsel Effective as of June 26, 2020 [Filed: 7/24/20] (Docket No. [612](#)).

Response Deadline: August 11, 2020 at 4:00 p.m. Eastern Time.

Responses Received:

- a) Informal comments from the United States Trustee.

Related Documents:

- a) Certification of Counsel Submitting Proposed Form of Order Granting the Application Authorizing the Employment and Retention of Cooley LLP as Lead Counsel Effective as of June 26, 2020 [Filed: 8/11/20] (Docket No. [705](#)).
- b) [Signed] Order Authorizing the Employment and Retention of Cooley LLP as Lead Counsel for the Official Committee of Unsecured Creditors [Filed: 8/12/20] (Docket No. [717](#)).

Status: The order has been entered. No hearing will be necessary.

2. **Morris James Retention Application** – Application for Entry of an Order Authorizing and Approving the Employment of Morris James LLP as Co-Counsel to the Official Committee of Unsecured Creditors *Nunc Pro Tunc* to June 26, 2020 [Filed: 7/24/20] (Docket No. [613](#)).

Response Deadline: August 11, 2020 at 4:00 p.m. Eastern Time.

Responses Received: None.

Related Documents:

- a) Certificate of No Objection Regarding Application for Entry of an Order Authorizing and Approving the Employment of Morris James LLP as Co-Counsel to the Official Committee of Unsecured Creditors *Nunc Pro Tunc* to June 26, 2020 [Filed: 8/12/20] (Docket No. [718](#)).
- b) [Signed] Order Granting Application Authorizing and Approving the Employment of Morris James LLP as Co-Counsel to the Official Committee of Unsecured Creditors *Nunc Pro Tunc* to June 26, 2020 [Filed: 8/13/20] (Docket No. [738](#)).

Status: The order has been entered. No hearing will be necessary.

3. **AlixPartners Retention Application** – Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of AlixPartners, LLP as Its Financial Advisor Effective as of June 29, 2020 [Filed: 7/28/20] (Docket No. [625](#)).

Response Deadline: August 11, 2020 at 4:00 p.m. Eastern Time.

Responses Received:

- a) Informal comments from the United States Trustee.

Related Documents:

- a) Certification of Counsel Submitting Proposed Form of Order Granting the Application Authorizing the Employment and Retention of AlixPartners, LLP as Its Financial Advisor Effective as of June 29, 202 [Filed: 8/11/20] (Docket No. [704](#)).
- b) [Signed] Order Authorizing the Official Committee of Unsecured Creditors to Employ and Retain AlixPartners, LLP as Its Financial Advisor Effective as of June 29, 2020 [Filed: 8/12/20] (Docket No. [716](#)).

Status: The order has been entered. No hearing will be necessary.

4. **Costco/TicketOps Rejection Motion** – Omnibus Motion of Debtors for Entry of Order (I) Authorizing Debtors to Reject Certificate Agreements and (II) Granting Related Relief [Filed: 8/10/20] (Docket No. [698](#)).

Response Deadline: August 17, 2020 at 4:00 p.m. Eastern Time.

Responses Received: None.

Related Documents:

- a) Certification of No Objection Regarding Omnibus Motion of Debtors for Entry of Order (I) Authorizing Debtors to Reject Certificate Agreements and (II) Granting Related Relief [Filed: 8/19/20] (Docket No. [759](#)).
- b) [Signed] Order (I) Authorizing Debtors to Reject Certificate Agreements and (II) Granting Related Relief [Filed: 8/19/20] (Docket No. [763](#)).

Status: The order has been entered. No hearing will be necessary.

CONTINUED MATTERS

5. **Givon Stay Motion** – Motion of Givon Crump for Relief from the Automatic Stay Pursuant to Section 362(d) of the Bankruptcy Code [Filed: 7/9/20] (Docket No. [466](#)).

Response Deadline: July 24, 2020 at 4:00 p.m. Eastern Time. Extended to a date and time to be determined for the Debtors.

Responses Received: None as of the date hereof.

Related Documents: None as of the date hereof.

Status: This matter has been adjourned to the September 15, 2020 omnibus hearing at 2:00 p.m. Eastern Time.

6. **Provost Stay Motion** – Verified Motion of Harry Provost, III for Relief from the Automatic Stay [Filed: 7/15/20] (Docket No. [563](#)).

Response Deadline: July 29, 2020 at 4:00 p.m. Eastern Time. Extended to August 21, 2020 at 4:00 p.m. Eastern Time for the Debtors.

Responses Received: None as of the date hereof.

Related Documents:

- a) Re-Notice of Motion of Harry Provost, III for Relief from the Automatic Stay [Filed: 7/16/20] (Docket No. [568](#)).

Status: This matter has been adjourned to the September 15, 2020 omnibus hearing at 2:00 p.m. Eastern Time.

7. **Mueller Stay Motion** – Motion of Diane Mueller for Relief from the Automatic Stay Pursuant to Section 362(d) of the Bankruptcy Code [Filed: 7/30/20] (Docket No. [637](#)).

Response Deadline: August 11, 2020 at 4:00 p.m. Eastern Time. Extended to August 31, 2020 at 4:00 p.m. Eastern Time for the Debtors.

Responses Received: None as of the date hereof.

Related Documents: None as of the date hereof.

Status: This matter has been adjourned to the September 15, 2020 omnibus hearing at 2:00 p.m. Eastern Time.

8. **KEIP/KERP Motion** – [SEALED] Motion of Debtors for Entry of Order (I) Approving Debtors' Incentive and Retention Programs for Certain Key Employees and (II) Granting Related Relief [Filed: 8/5/20] (Docket No. [665](#)).

Response Deadline: August 19, 2020 at 4:00 p.m. Eastern Time. Extended to September 8, 2020 at 4:00 p.m. Eastern Time for the United States Trustee and the Official Committee of Unsecured Creditors.

Responses Received:

- a) Limited Objection and Reservation of Rights of the Official Committee of Unsecured Creditors in Response to the Motion of Debtors for Entry of Order (I) Approving Debtors' Incentive and Retention Programs for Certain Key Employees and (II) Granting Related Relief [Filed: 8/7/20] (Docket No. [685](#)).

Related Documents:

- a) [REDACTED] Motion of Debtors for Entry of Order (I) Approving Debtors' Incentive and Retention Programs for Certain Key Employees and (II) Granting Related Relief [Filed: 8/5/20] (Docket No. [666](#)).
- b) [SEALED] Declaration of Dewey Imhoff in Support of Motion of Debtors for Entry of an Order (I) Approving Debtors' Incentive and Retention Programs for Certain Key Employees and (II) Granting Related Relief [Filed: 8/5/20] (Docket No. [667](#)).
- c) [REDACTED] Declaration of Dewey Imhoff in Support of Motion of Debtors for Entry of an Order (I) Approving Debtors' Incentive and Retention Programs for Certain Key Employees and (II) Granting Related Relief [Filed: 8/5/20] (Docket No. [668](#)).
- d) Declaration of Daniel Hugo in Support of Motion of Debtors for Entry of an Order (I) Approving Debtors' Incentive and Retention Programs for Certain Key Employees and (II) Granting Related Relief [Filed: 8/5/20] (Docket No. [669](#)).
- e) Debtors' Motion to Shorten Notice and Schedule Hearing with Respect to Motion for Entry of Order Approving Debtors' Incentive and Retention Programs for Certain Key Employees [Filed: 8/5/20] (Docket No. [671](#)).
- f) [Signed] Order Granting Debtors' Motion to Shorten Notice and Schedule Hearing with Respect to Motion for Entry of Order Approving Debtors' Incentive and Retention Programs for Certain Key Employees [Filed: 8/6/20] (Docket No. [673](#)).
- g) Notice of Hearing on Motion of Debtors for Entry of Order (I) Approving Debtors' Incentive and Retention Programs for Certain Key Employees and (II) Granting Related Relief [Filed: 8/6/20] (Docket No. [676](#)).

Status: This matter has been adjourned to the September 15, 2020 omnibus hearing at 2:00 p.m. Eastern Time.

9. **KEIP/KERP Seal Motion** – Motion for Entry of Order Authorizing Debtors to File Under Seal Certain Information Included in Motion for Entry of Order Approving Debtors’ Incentive and Retention Programs for Certain Key Employees and Related Declaration [Filed: 8/5/20] (Docket No. [670](#)).

Response Deadline: August 17, 2020 at 4:00 p.m. Eastern Time. Extended to September 8, 2020 at 4:00 p.m. Eastern Time for the United States Trustee and the Official Committee of Unsecured Creditors.

Responses Received: None as of the date hereof.

Related Documents:

- a) Notice of Motion for Entry of Order Authorizing Debtors to File Under Seal Certain Information Included in Motion for Entry of Order Approving Debtors’ Incentive and Retention Programs for Certain Key Employees [Filed: 8/6/20] (Docket No. [672](#)).

Status: This matter has been adjourned to the September 15, 2020 omnibus hearing at 2:00 p.m. Eastern Time.

MATTERS GOING FORWARD

10. **MLT Stay Motion** – MLT Station, L.L.C.’s Motion for Relief from the Automatic Stay Pursuant to Bankruptcy Code Section 362(d) [Filed: 7/13/20] (Docket No. [514](#)).

Response Deadline: July 27, 2020 at 4:00 p.m. Eastern Time.

Responses Received:

- a) Objection of Debtors to MLT Station L.L.C.’s Motion for Relief from the Automatic Stay Pursuant to Bankruptcy Code Section 362(s) [Filed: 7/27/20] (Docket No. [620](#)).

Replies Filed:

- a) MLT Station, L.L.C.’s Reply to Debtors’ Objection to Motion for Relief from the Automatic Stay Pursuant to Bankruptcy Code Section 362(d) [Filed: 8/13/20] (Docket No. [739](#)).

Related Documents:

- a) Notice of MLT Station, L.L.C.’s Motion for Relief from the Automatic Stay Pursuant to Bankruptcy Code Section 362(d) [Filed: 7/15/20] (Docket No. [562](#)).

Status: This matter will go forward.

11. **LaSalle Stay Motion** – Motion of LaSalle, LP and AAP Trust (formerly Goodman Enterprises, LLC) for an Order (I) Pursuant to Section 362(j) Confirming Prepetition Lease Termination and Non-Application of Automatic Stay or, Alternatively, (II) Pursuant to Section 362(d) Granting Relief from the Stay [Filed: 7/13/20] (Docket No. [516](#)).

Response Deadline: August 3, 2020 at 4:00 p.m. Eastern Time.

Responses Received:

- a) Objection of Debtors to Motion of LaSalle, LP and AAP Trust (formerly Goodman Enterprises LLC) for an Order: (I) Pursuant to Section 362(j) Confirming Prepetition Lease Termination and Non-Application of Automatic Stay or, Alternatively, (II) Pursuant to 362(d) Granting Relief from the Stay [Filed: 8/3/20] (Docket No. [653](#)).

Replies Filed:

- a) Reply in Support of Motion of LaSalle, LP and ASP Trust (formerly Goodman Enterprises, LLC) for an Order (I) Pursuant to Section 362(j) Confirming Prepetition Lease Termination and Non-Application of Automatic Stay or, Alternatively, (II) Pursuant to Section 362(d) Granting Relief from The Stay [Filed: 8/13/20] (Docket No. [735](#)).
- b) Declaration of Steven J. Casad in Support of Reply and Motion of LaSalle, LP and AAP Trust (formerly Goodman Enterprises, LLC) for an Order (I) Pursuant to Section 362(j) Confirming Prepetition Lease Termination and Non-Application of Automatic Stay or, Alternatively, (II) Pursuant to Section 362(d) Granting Relief from the Stay [Filed: 8/13/20] (Docket No. [736](#)).
- c) Request for Judicial Notice in Support of Motion of LaSalle, LP and AAP Trust for an Order (I) Pursuant to Section 362(j) Confirming Prepetition Lease Termination and Non-Application of Automatic Stay or, Alternatively, (II) Pursuant to Section 362(d) Granting Relief from the Stay [Filed: 8/13/20] (Docket No. [737](#)).

Related Documents: None as of the date hereof.

Status: This matter will go forward.

12. **Bar Date Motion** – Motion of Debtors for Entry of Order (I) Establishing a General Bar Date to File Proofs of Claim, (II) Establishing a Bar Date to File Proofs of Claim By Governmental Units, (III) Establishing a Bar Date to File Requests for Payment of Postpetition Administrative Claims, (IV) Establishing an Amended Schedules Bar Date, (V) Establishing a Rejection Damages Bar Date, (VI) Approving the Form and Manner for Filing Proofs of Claim, (VII) Approving the Proposed Notice of Bar Dates, (VIII)

Approving Procedures with Respect to Service of the Proposed Notice of Bar Dates, and (IX) Granting Related Relief [Filed: 8/10/20] (Docket No. 697).

Response Deadline: August 17, 2020 at 4:00 p.m. Eastern Time. August 19, 2020 at 12:00 p.m. Eastern Time for the United States Trustee.

Responses Received:

a) Informal comments from the United States Trustee.

Related Documents: None as of the date hereof.

Status: This matter will go forward.

Dated: August 20, 2020
Wilmington, Delaware

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Peter J. Keane

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