

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

In re	Chapter 11
The Hertz Corporation, <i>et al.</i> , <sup>1</sup>	Case No. 20-11218 (MFW)
Debtors.	(Jointly Administered)
The Hertz Corporation, <i>et al.</i> ,	Adv. Pro. No. 20-50761 (MFW)
Plaintiffs,	
v.	
Hannah Ayoub, et al.,	
Defendants.	

**NOTICE OF AGENDA FOR TELEPHONIC AND VIDEO HEARING  
SCHEDULED FOR DECEMBER 16, 2020 AT 10:30 A.M. (PREVAILING EASTERN  
TIME), BEFORE THE HONORABLE MARY F. WALRATH, AT THE UNITED  
STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE<sup>2</sup>**

**THIS HEARING WILL BE HELD TELEPHONICALLY AND BY VIDEO.**

**ALL PARTIES WISHING TO APPEAR MUST DO SO TELEPHONICALLY BY  
DECEMBER 15, 2020 BY NOON. ONLY THOSE PARTIES THAT WILL BE  
ADDRESSING THE COURT SHOULD APPEAR BY ZOOM AND COURTCALL.**

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

<sup>1</sup> The last four digits of The Hertz Corporation's tax identification number are 8568. The location of the debtors' service address is 8501 Williams Road, Estero, FL 33928. Due to the large number of debtors in these chapter 11 cases, which are jointly administered for procedural purposes, a complete list of the debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the debtors' claims and noticing agent at <https://restructuring.primeclerk.com/hertz>.

<sup>2</sup> All motions and other pleadings referenced herein are available online at the following address: <https://restructuring.primeclerk.com/hertz>.

**TO APPEAR BY VIDEO CONFERENCE,  
PARTIES SHOULD USE THE FOLLOWING INFORMATION:  
JOIN ZOOMGOV HEARING: <https://debuscourts.zoomgov.com/j/1615941382>  
Meeting ID: 161 594 1382; Passcode: 963399**

**I. WITHDRAWN/RESOLVED MATTERS:**

1. Debtors' Fifth Omnibus Motion for Entry of an Order Authorizing the Rejection of Certain Executory Contracts Effective *Nunc Pro Tunc* to the Specified Rejection Date [[Docket No. 1139](#) – filed August 26, 2020]

Objection/Response Deadline: September 2, 2020 at 4:00 p.m. (ET); extended by agreement to November 10, 2020 solely with respect to the counterparties to the contracts noted at paragraph 3 of the Order at Docket No. 1224 (the "Former Executives")

Objections/Responses Received:

- A. Informal comments from the Former Executives

Related Documents:

- i. Order Authorizing the Rejection of Certain Executory Contracts Effective *Nunc Pro Tunc* to the Specified Rejection Date [[Docket No. 1224](#) – entered September 8, 2020]
- ii. Order Approving Stipulation and Agreement Between Debtors and Certain Former Executives Regarding Rejection of Certain Contracts [[Docket No. 1805](#) – entered November 19, 2020]

Status: On November 19, 2020, the Court entered an order resolving the outstanding issues related to this matter. Accordingly, a hearing with respect to this matter is no longer necessary.

2. Motion of Firstmark Credit Union for Relief from the Automatic Stay [[Docket No. 1501](#) – filed October 14, 2020]

Objection/Response Deadline: November 2, 2020 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents:

- i. Declaration of Rick Nelson in Support of Motion of Firstmark Credit Union for Relief from the Automatic Stay [[Docket No. 1503](#) – filed October 14, 2020]

- ii. Order Approving Stipulation Regarding Motion of Firstmark Credit Union for Relief from the Automatic Stay [[Docket No. 1795](#) – entered November 18, 2020]

Status: On November 18, 2020, the Court entered an order resolving this matter. Accordingly, a hearing with respect to this matter is no longer necessary.

3. Motion of Geraldine Peterson to Modify the Automatic Stay to the Extent of Liability Insurance [[Docket No. 1547](#) – filed October 20, 2020]

Objection/Response Deadline: November 7, 2020 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents:

- i. Order Approving Stipulation Regarding Motion of Geraldine Peterson to Modify the Automatic Stay to the Extent of Liability Insurance [[Docket No. 1975](#) – entered November 30, 2020]

Status: On November 30, 2020, the Court entered an order resolving this matter. Accordingly, a hearing with respect to this matter is no longer necessary.

4. Motion of Joshua Potter, Administrator of the Estate of Landen Jones, Deceased, for Relief from Stay Under Section 362 of the Bankruptcy Code [[Docket No. 1618](#) – filed October 27, 2020]

Objection/Response Deadline: December 7, 2020 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents:

- i. Notice of Hearing [[Docket No. 1619](#) – filed October 27, 2020]
- ii. Order Approving Stipulation Regarding Motion of Joshua Potter, Administrator of the Estate of Landen Jones, Deceased, for Relief from Stay [[Docket No. 2051](#) – entered December 10, 2020]

Status: On December 10, 2020, the Court entered an order resolving this matter. Accordingly, a hearing with respect to this matter is no longer necessary.

5. Alternative Motion (1) to Modify the Automatic Stay to Permit Arbitration of Dispute or (2) for Determination That Automatic Stay Does Not Apply of Motoka Rentals Limited [[Docket No. 1624](#) – filed October 27, 2020]

Objection/Response Deadline: November 13, 2020 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents:

- i. Order Approving Stipulation Regarding Motions of Kingmill Pty Ltd and Motoka Rentals Limited for Relief from Automatic Stay [[Docket No. 1997](#) – entered December 2, 2020]

Status: On December 2, 2020, the Court entered an order resolving this matter. Accordingly, a hearing with respect to this matter is no longer necessary.

6. Alternative Motion (1) to Modify the Automatic Stay to Permit Arbitration of Dispute or (2) for Determination That Automatic Stay Does Not Apply of Kingmill Pty, Ltd. [[Docket No. 1626](#) – filed October 27, 2020]

Objection/Response Deadline: November 13, 2020 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents:

- i. Order Approving Stipulation Regarding Motions of Kingmill Pty Ltd and Motoka Rentals Limited for Relief from Automatic Stay [[Docket No. 1997](#) – entered December 2, 2020]

Status: On December 2, 2020, the Court entered an order resolving this matter. Accordingly, a hearing with respect to this matter is no longer necessary.

7. Delores M. King’s Motion to Allow Late Filed Claim to Be Treated as Timely [[Docket No. 1725](#) – filed November 9, 2020]

Objection/Response Deadline: December 8, 2020 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents:

- i. Notice of Withdrawal of Delores M. King’s Motion to Allow Late Filed Claim to Be Treated as Timely [[Docket No. 1967](#) – filed November 30, 2020]

Status: On November 30, 2020, the Movant withdrew this matter. Accordingly, a hearing with respect to this matter is no longer necessary.

8. Motion of Jessica Bowens for Relief from Automatic Stay [[Docket No. 1734](#) – filed November 11, 2020]

Objection/Response Deadline: December 9, 2020 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents:

- i. Order Approving Stipulation Regarding Motion of Jessica Bowens for Relief from Automatic Stay [[Docket No. 2014](#) – entered December 4, 2020]

Status: On December 4, 2020, the Court entered an order resolving this matter. Accordingly, a hearing with respect to this matter is no longer necessary.

9. Debtors’ Supplemental Application for Entry of an Order Expanding the Scope of Services to Be Provided by Ernst & Young LLP as Audit and Tax Service Provider for the Debtors *Nunc Pro Tunc* to October 1, 2020 [[Docket No. 1757](#) – filed November 13, 2020]

Objection/Response Deadline: December 2, 2020 at 4:00 p.m. (ET); extended by agreement to December 4, 2020 at 4:00 p.m. for the Office of the United States Trustee (the “U.S. Trustee”)

Objections/Responses Received:

- A. Informal comments received from the Official Committee of Unsecured Creditors (the “Committee”)
- B. Informal comments received from the U.S. Trustee

Related Documents:

- i. Order Authorizing an Expanded Scope of Services to Be Provided by Ernst & Young LLP as Audit and Tax Services Provider for the Debtors *Nunc Pro Tunc* to October 1, 2020 [[Docket No. 2053](#) – entered December 10, 2020]

Status: On December 10, 2020, the Court entered an order resolving this matter. Accordingly, a hearing with respect to this matter is no longer necessary.

10. Motion [of Alan Weiner] for Partial Relief from the Automatic Stay [[Docket No. 1762](#) – filed November 16, 2020]

Objection/Response Deadline: December 9, 2020 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents:

- i. Order Approving Stipulation Regarding Motion of Alan Weiner for Partial Relief from the Automatic Stay [[Docket No. 2068](#) – entered December 11, 2020]

Status: On December 11, 2020, the Court entered an order resolving this matter. Accordingly, a hearing with respect to this matter is no longer necessary.

11. Debtors' Motion for Entry of an Order Authorizing Debtors to File Under Seal Certain Portions of the Debtors' Schedules of Assets and Liabilities [[Docket No. 1888](#) – filed November 22, 2020]

Objection/Response Deadline: December 7, 2020 at 4:00 p.m. (ET); extended by agreement to December 9, 2020 at 4:00 p.m. (ET) for the U.S. Trustee

Objections/Responses Received: None.

Related Documents:

- i. Declaration of Tom Callahan in Support of Debtors' Motion for Entry of an Order Authorizing Debtors to File Under Seal Certain Portions of the Debtors' Schedules of Assets and Liabilities [[Docket No. 2049](#) – filed December 10, 2020]
- ii. Order Authorizing Debtors to File Under Seal Certain Portions of the Debtors' Schedules of Assets and Liabilities [[Docket No. 2070](#) – entered December 11, 2020]

Status: On December 11, 2020, the Court entered an order resolving this matter. Accordingly, a hearing with respect to this matter is no longer necessary.

12. Motion of Johneisha and Raynette Horne for Relief from the Automatic Stay to Pursue the State Court Action Against Debtors [[Docket No. 1936](#) – filed November 24, 2020]

Objection/Response Deadline: December 9, 2020 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents:

- i. Order Approving Stipulation Regarding Motion of Johneisha and Raynette Horne for Relief from the Automatic Stay [[Docket No. 2069](#) – entered December 11, 2020]

Status: On December 11, 2020, the Court entered an order resolving this matter. Accordingly, a hearing with respect to this matter is no longer necessary.

13. Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing Retention and Employment of Prime Clerk LLC as Information Agent to the Official Committee of Unsecured Creditors [[Docket No. 1944](#) – filed November 25, 2020]

Objection/Response Deadline: December 9, 2020 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents:

- i. Order Authorizing Employment and Retention of Prime Clerk LLC as Information Agent to the Official Committee of Unsecured Creditors [[Docket No. 2064](#) – entered December 11, 2020]

Status: On December 11, 2020, the Court entered an order resolving this matter. Accordingly, a hearing with respect to this matter is no longer necessary.

14. Motion to File Under Seal Certain Documents Filed in Support of Enrico Moretti's Motion for Entry of an Order Applying Bankruptcy Rule 7023 to His Class Proof of Claim and Certifying the Classes and Subclasses [[Docket No. 1986](#) – filed December 1, 2020]

Objection/Response Deadline: December 9, 2020 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents:

- i. Order Granting Motion to File Under Seal Certain Exhibits Appended to the Declaration of Matthew T. McCrary in Support of Enrico Moretti's Motion for Entry of an Order Applying Bankruptcy Rule 7023 to His Class Proof of Claim and Certifying the Classes and Subclasses [[Docket No. 2065](#) – entered December 11, 2020]

Status: On December 11, 2020, the Court entered an order resolving this matter. Accordingly, a hearing with respect to this matter is no longer necessary.

## **II. CONTINUED MATTERS:**

15. Pretrial Conference in Adversary Case No. 20-50761 (MFW)

Related Documents:

- i. Order Approving Stipulation Regarding Briefing Schedule for Motions Regarding Automatic Stay [[Docket No. 758](#) – entered July 17, 2020]
- ii. Complaint for Injunctive Relief [Adv. Case No. 20-50761 (MFW) – [Docket No. 1](#) – filed July 17, 2020]
- iii. Summons and Notice of Pretrial Conference in an Adversary Proceeding [Adv. Case No. 20-50761 (MFW) – [Docket No. 26](#) – filed October 15, 2020]

Status: The pretrial conference has been continued to the omnibus hearing scheduled for March 17, 2021 at 10:30 a.m. (ET).

16. The Greater Orlando Airport Authority's Motion for Order Allowing, Authorizing, and Directing Immediate Payment of Administrative Expense Claim [[Docket No. 1083](#) – filed August 18, 2020]

Objection/Response Deadline: October 6, 2020 at 4:00 p.m. (ET); extended by agreement for the Debtors to January 6, 2021 at 4:00 p.m. (ET)

Objections/Responses Received: None at this time.

Related Documents:

- i. Notice of Hearing Regarding the Greater Orlando Airport Authority's Motion for Order Allowing, Authorizing, and Directing Immediate Payment of Administrative Expense Claim [[Docket No. 1105](#) – filed August 20, 2020]

Status: The hearing on this matter has been continued to the omnibus hearing scheduled for January 13, 2021 at 10:30 a.m. (ET).

17. Allstate's Motion for Relief from Automatic Stay [[Docket No. 1678](#) – filed November 2, 2020]

Objection/Response Deadline: December 9, 2020 at 4:00 p.m. (ET); continued by agreement for the Debtors to January 6, 2021 at 4:00 p.m. (ET)

Objections/Responses Received: None at this time.

Related Documents:

- i. Amended Notice of Allstate's Motion for Relief from Automatic Stay [[Docket No. 1752](#) – filed November 13, 2020]

Status: The hearing on this matter has been continued to the omnibus hearing scheduled for January 13, 2021 at 10:30 a.m. (ET).

18. Motion of Anthony M. Alford, Sr., for Relief from the Automatic Stay Pursuant to Section 362 of the Bankruptcy Code [[Docket No. 1680](#) – filed November 3, 2020]

Objection/Response Deadline: December 9, 2020 at 4:00 p.m. (ET); continued by agreement for the Debtors to January 6, 2021 at 4:00 p.m. (ET)

Objections/Responses Received: None at this time.

Related Documents: None at this time.



Status: The hearing on this matter has been continued to the omnibus hearing scheduled for January 13, 2021 at 10:30 a.m. (ET).

19. Motion of Consumer Privacy Litigation Plaintiff's Motion for Entry of an Order (i) Applying Bankruptcy Rule 7023 to Class Proof of Claim, and (ii) Certifying the Class for Purposes of the Class Proof of Claim [[Docket No. 1748](#) – filed November 13, 2020]

Objection/Response Deadline: November 30, 2020 at 4:00 p.m. (ET); extended by agreement for the Debtors to January 6, 2021 at 4:00 p.m. (ET)

Objections/Responses Received: None at this time.

Related Documents: None at this time.

Status: The hearing on this matter has been continued to the omnibus hearing scheduled for January 13, 2021 at 10:30 a.m. (ET).

20. Motion of Emilia Torres Rodriguez for Relief from Stay Pursuant to Section 362 of the Bankruptcy Code [[Docket No. 1925](#) – filed November 23, 2020]

Objection/Response Deadline: December 7, 2020 at 4:00 p.m.; extended by agreement for the Debtors to January 6, 2021 at 4:00 p.m. (ET)

Objections/Responses Received: None at this time.

Related Documents: None at this time.

Status: The hearing on this matter has been continued to the omnibus hearing scheduled for January 13, 2021 at 10:30 a.m. (ET).

### **III. MATTER SUBMITTED UNDER CERTIFICATION:**

21. Motion of the Metropolitan Nashville Airport Authority for Relief from the Automatic Stay to Draw on Prepetition Letters of Credit [[Docket No. 1342](#) – filed September 22, 2020] (the "Motion for Stay Relief")

Objection/Response Deadline: October 6, 2020 at 4:00 p.m. (ET); extended by agreement to December 11, 2020 for the Debtors

Objections/Responses Received: None at this time.

Related Documents:

- i. Third Notice of Assumption of Certain Executory Contracts and Unexpired Leases [[Docket No. 1758](#) – filed November 13, 2020] (the “Third Assumption Notice”)
- ii. Certification of Counsel Regarding Third Notice of Assumption of Certain Executory Contracts and Unexpired Leases [[Docket No. 2083](#) – filed December 11, 2020] (the “COC”)

Status: Subsequent to the Motion for Stay Relief, the Debtors filed the Third Assumption Notice seeking to assume certain agreements to which the movant and Debtors are party. The movant provided informal comments to the Third Assumption Notice, and the parties have agreed to resolve the movant’s issues raised in the Motion for Stay Relief and with respect to the Third Assumption Notice as set forth in the COC and proposed order attached thereto. Accordingly, a hearing on this matter is only necessary to the extent the Court has questions.

**IV. MATTERS GOING FORWARD:**

22. Motion of Daniel J. Ortiz and Paul W. Ortiz, Individually and as Co-Personal Representatives of the Estates of Joan Ortiz a/k/a Joan T. Ortiz and Paul Ortiz for Relief from the Automatic Stay [[Docket No. 1505](#) – filed October 14, 2020]

Objection/Response Deadline: November 4, 2020 at 4:00 p.m. (ET)

Objections/Responses Received:

- A. Debtors’ Objection to Ortiz Motion for Relief from the Automatic Stay [[Docket No. 1692](#) – filed November 4, 2020]

Related Documents:

- i. Affidavit of Andrew G. Moore, Esquire, in Support of Motion of Daniel J. Ortiz and Paul W. Ortiz, Individually and as Co-Personal Representatives of the Estates of Joan Ortiz a/k/a Joan T. Ortiz and Paul Ortiz for Relief from the Automatic Stay [[Docket No. 1506](#) – filed October 14, 2020]

Status: The hearing on this matter will go forward.

23. Motion of Leonardo Rivera Rojas and Valeria Rivera Rojas for Relief from the Automatic Stay [[Docket No. 1538](#) – filed October 19, 2020]

Objection/Response Deadline: November 9, 2020 at 4:00 p.m. (ET); extended by agreement to December 9, 2020 at 4:00 p.m. (ET) for the Debtors

Objections/Responses Received:

- A. Debtors' Limited Objection to Rojas Motion for Relief from Automatic Stay [[Docket No. 2041](#) – filed December 9, 2020]

Related Documents:

- i. Affidavit of Jose M. Calderon, Esquire in Support of Motion of Leonardo Rivera Rojas and Valeria Rivera Rojas for Relief from the Automatic Stay [[Docket No. 1539](#) – filed October 19, 2020]

Status: The hearing on this matter will go forward.

24. Debtors' Motion for Entry of Orders (i)(a) Establishing Bidding Procedures Relating to the Sale of Substantially All of the Assets of Donlen Corporation and Its Debtor Subsidiaries; (b) Approving the Termination Payment; (c) Establishing Procedures Relating to the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, Including Notice of Proposed Cure Amounts; (d) Approving Form and Manner of Notice of All Procedures, Protections, Schedules, and Agreements; and (e) Scheduling a Hearing to Consider the Proposed Sale; (ii) Authorizing and Approving the Sale of Substantially All of the Assets of Donlen Corporation and Its Debtor Subsidiaries Free and Clear of All Liens, Claims, Encumbrances, and Interests; (iii) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (iv) Granting Related Relief [[Docket No. 1953](#) – filed November 25, 2020]

Objection/Response Deadline: December 9, 2020 at 4:00 p.m. (ET); extended by agreement for the U.S. Trustee, the Committee and the Ad Hoc Group of Hertz Bondholders to December 11, 2020 at 4:00 p.m. (ET)

Objections/Responses Received:

- A. Informal comments received from the U.S. Trustee
- B. Informal comments received from The Pep Boys – Manny, Moe & Jack
- C. Prepetition First Lien Agent's Statement and Reservation of Rights in Response to Debtors' Motion to Approve Bidding Procedures Relating to the Sale of Substantially All of the Assets of Donlen Corporation and its Debtor Subsidiaries [[Docket No. 2038](#) – filed December 9, 2020]
- D. Objection of the Ad Hoc Group of Hertz Bondholders to Debtors' Motion for Entry of Orders: (i) (a) Establishing Bidding Procedures Relating to the Sale of Substantially All of the Assets of Donlen Corporation and Its Debtor Subsidiaries; (b) Approving the Termination Payments; (c) Establishing Procedures Relating to the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, Including Notice of Proposed Cure Amounts; (d) Approving Form and Manner of Notice of All Procedures, Protections, Schedules, and Agreements; and (e) Scheduling a Hearing to

Consider the Proposed Sale; (ii) Authorizing and Approving the Sale of Substantially All of the Assets of Donlen Corporation and Its Debtor Subsidiaries Free and Clear of All Liens, Claims, Encumbrances, and Interests; (iii) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (iv) Granting Related Relief [[Docket No. 2071](#) – filed December 11, 2020]

i. Declaration of Jeff Raithel in Support of the Ad Hoc Group of Hertz Bondholders' Objection to Debtors' Motion for Entry of Orders: (i) (a) Establishing Bidding Procedures Relating to the Sale of Substantially All of the Assets of Donlen Corporation and Its Debtor Subsidiaries; (b) Approving the Termination Payments; (c) Establishing Procedures Relating to the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, Including Notice of Proposed Cure Amounts; (d) Approving Form and Manner of Notice of All Procedures, Protections, Schedules, and Agreements; and (e) Scheduling a Hearing to Consider the Proposed Sale; (ii) Authorizing and Approving the Sale of Substantially All of the Assets of Donlen Corporation and Its Debtor Subsidiaries Free and Clear of All Liens, Claims, Encumbrances, and Interests; (iii) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (iv) Granting Related Relief [[Docket No. 2072](#) – filed December 11, 2020]

E. [SEALED] Limited Objection of the Official Committee of Unsecured Creditors to the Debtors' Motion for Entry of Orders: (i)(a) Establishing Bidding Procedures Relating to the Sale of Substantially All of the Assets of Donlen Corporation and Its Debtor Subsidiaries; (b) Approving the Termination Payments; (c) Establishing Procedures Relating to the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, Including Notice of Proposed Cure Amounts; (d) Approving Form and Manner of Notice of All Procedures, Protections, Schedules, and Agreements; and (e) Scheduling a Hearing to Consider the Proposed Sale; (ii) Authorizing and Approving the Sale of Substantially All of the Assets of Donlen Corporation and Its Debtor Subsidiaries Free and Clear of All Liens, Claims, Encumbrances, and Interests; (iii) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (iv) Granting Related Relief [[Docket No. 2075](#) – filed December 11, 2020]

i. Notice of Filing of Proposed Redacted Version of the Limited Objection of the Official Committee of Unsecured Creditors to the Debtors' Motion for Entry of Orders: (i)(a) Establishing Bidding Procedures Relating to the Sale of Substantially All of the Assets of Donlen Corporation and Its Debtor Subsidiaries; (b) Approving the Termination Payments; (c) Establishing Procedures Relating to the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, Including Notice of Proposed Cure Amounts; (d)

Approving Form and Manner of Notice of All Procedures, Protections, Schedules, and Agreements; and (e) Scheduling a Hearing to Consider the Proposed Sale; (ii) Authorizing and Approving the Sale of Substantially All of the Assets of Donlen Corporation and Its Debtor Subsidiaries Free and Clear of All Liens, Claims, Encumbrances, and Interests; (iii) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (iv) Granting Related Relief [[Docket No. 2085](#) – filed December 14, 2020]

Related Documents:

- i. Declaration of Jonathan Kaye in Support of Debtors’ Motion for Entry of Orders: (i)(a) Establishing Bidding Procedures Relating to the Sale of Substantially All of the Assets of Donlen Corporation and Its Debtor Subsidiaries; (b) Approving the Termination Payments; (c) Establishing Procedures Relating to the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, Including Notice of Proposed Cure Amounts; (d) Approving Form and Manner of Notice of All Procedures, Protections, Schedules, and Agreements; and (e) Scheduling a Hearing to Consider the Proposed Sale; (ii) Authorizing and Approving the Sale of Substantially All of the Assets of Donlen Corporation and Its Debtor Subsidiaries Free and Clear of All Liens, Claims, Encumbrances, and Interests; (iii) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (iv) Granting Related Relief [[Docket No. 1954](#) – filed November 25, 2020]

Witness Information:

- i. Jonathan Kaye, a Managing Director at Moelis & Company LLC, will be available to testify by video from New York, NY.
- ii. Jeff Raithel, a Managing Director at Ducera Partners LLC, will be available to testify by video from Los Angeles, CA.

Status: The informal comments received from The Pep Boys – Manny, Moe & Jack have been resolved. The Debtors intend to file a reply to the objections and in support of the motion prior to the hearing. The hearing on this matter, as it relates to approval of the bidding procedures, will go forward.

25. Debtors’ Supplemental Application for Entry of an Order (i) Authorizing and Approving Amendment to the Retention and Employment of Moelis & Company LLC as Investment Banker to the Debtors and (ii) Granting Related Relief [[Docket No. 1955](#) – filed November 25, 2020]

Objection/Response Deadline: December 9, 2020 at 4:00 p.m. (ET); extended by agreement for the U.S. Trustee to December 11, 2020 at 4:00 p.m. (ET)

Objections/Responses Received:

- A. Objection of the United States Trustee to Debtors' Supplemental Application for Entry of an Order (i) Authorizing and Approving an Amendment to the Retention and Employment of Moelis & Company LLC as Investment Banker to the Debtors and (ii) Granting Related Relief [[Docket No. 2080](#) – filed December 11, 2020]

Related Documents: None at this time.

Witness Information:

- i. William Q. Derrough, a Managing Director and Global Co-Head of Recapitalization & Restructuring of Moelis & Company LLC, will be available to testify by video from New York, NY.

Status: The hearing on this matter will go forward.

26. Motion of the Official Committee of Unsecured Creditors for Entry of an Order, Pursuant to Bankruptcy Code Section 107(b), Bankruptcy Rule 9018, and Local Rule 9018-1(d), Authorizing the Committee to File Under Seal the Limited Objection of the Official Committee of Unsecured Creditors to the Debtors' Motion for Entry of Orders: (i)(a) Establishing Bidding Procedures Relating to the Sale of Substantially All of the Assets of Donlen Corporation and Its Debtor Subsidiaries; (b) Approving the Termination Payments; (c) Establishing Procedures Relating to the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, Including Notice of Proposed Cure Amounts; (d) Approving Form and Manner of Notice of All Procedures, Protections, Schedules, and Agreements; and (e) Scheduling a Hearing to Consider the Proposed Sale; (ii) Authorizing and Approving the Sale of Substantially All of the Assets of Donlen Corporation and Its Debtor Subsidiaries Free and Clear of All Liens, Claims, Encumbrances, and Interests; (iii) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (iv) Granting Related Relief [[Docket No. 2084](#) – filed December 14, 2020]

Objection/Response Deadline: At the hearing.

Objections/Responses Received: None at this time.

Related Documents: None at this time.

Status: The hearing on this matter will go forward.

Dated: December 14, 2020

/s/ J. Zachary Noble

**RICHARDS, LAYTON & FINGER, P.A.**

Mark D. Collins (No. 2981)  
Robert J. Stearn, Jr. (No. 2915)  
John H. Knight (No. 3848)  
Brett M. Haywood (No. 6166)  
Christopher M. De Lillo (No. 6355)  
J. Zachary Noble (No. 6689)  
One Rodney Square  
920 N. King Street  
Wilmington, DE 19801  
Telephone: (302) 651-7700  
Facsimile: (302) 651-7701  
collins@rlf.com  
stearn@rlf.com  
knight@rlf.com  
haywood@rlf.com  
delillo@rlf.com  
noble@rlf.com

—and—

**WHITE & CASE LLP**

Thomas E Lauria (admitted *pro hac vice*)  
Matthew C. Brown (admitted *pro hac vice*)  
200 South Biscayne Boulevard, Suite 4900  
Miami, FL 33131  
Telephone: (305) 371-2700  
tlauria@whitecase.com  
mbrown@whitecase.com

J. Christopher Shore (admitted *pro hac vice*)  
David M. Turetsky (admitted *pro hac vice*)  
Andrea Amulic (admitted *pro hac vice*)  
1221 Avenue of the Americas  
New York, NY 10020  
Telephone: (212) 819-8200  
cshore@whitecase.com  
david.turetsky@whitecase.com  
andrea.amulic@whitecase.com

Jason N. Zakia (admitted *pro hac vice*)  
111 South Wacker Drive  
Chicago, IL 60606  
Telephone: (312) 881-5400  
jzakia@whitecase.com

Ronald K. Gorsich (admitted *pro hac vice*)  
Aaron Colodny (admitted *pro hac vice*)  
Andrew Mackintosh (admitted *pro hac vice*)  
Doah Kim (admitted *pro hac vice*)  
555 South Flower Street, Suite 2700  
Los Angeles, CA 90071  
Telephone: (213) 620-7700  
rgorsich@whitecase.com  
aaron.colodny@whitecase.com  
amackintosh@whitecase.com  
doah.kim@whitecase.com

*Co-Counsel to the Debtors and Debtors-in-Possession*