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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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| In re | : |
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| SEARS HOLDINGS CORPORATION, et al., | : |
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| | : |
| Debtors.¹ | : |
| -----X | |

**Chapter 11
Case No. 18-23538 (RDD)
(Jointly Administered)**

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
TELEPHONIC HEARING ON MARCH 25, 2020 AT 10:00 A.M.**

Location of Hearing: United States Bankruptcy Court for the Southern District of New York,
before the Honorable Robert D. Drain, United States Bankruptcy Judge,
300 Quarropas Street, White Plains, New York 10601

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); SR – Rover de Puerto Rico, LLC (f/k/a Sears, Roebuck de Puerto Rico, Inc.). (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors’ corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

PLEASE TAKE NOTICE, the United States Bankruptcy Court for the Southern District of New York (the "Court") has entered the General Order M-543 in order to protect public health, and in recognition of the national emergency that was declared by the President of the United States on March 13, 2020, the Court hereby orders all conferences scheduled to be held in the White Plains Division of the Bankruptcy Court will be conducted telephonically. All attorneys, witnesses and parties wishing to appear at, or attend, a telephonic hearing or conference must refer to the Bankruptcy Judge's guidelines for telephonic appearances and make arrangements with CourtCall at (888) 882-6878 or <https://courtcall.com/>.

I. ADVERSARY PROCEEDING:

1. VIR Ventures, Inc., *et al.* v. Sears Holdings Corporation
[Adversary Proceeding Case No. 19-08700]

Motion to Dismiss

Related Documents:

- A. Adversary Complaint [ECF No. 1]
- B. Second Summons [ECF No. 3]
- C. Motion to Adjourn Adversary Proceeding or, in the Alternative, for an Extension of Time to Answer or Otherwise Respond to Plaintiffs' Adversary Complaint [ECF No. 5]
- D. Joint Response of VIR Ventures, Inc. and AMI Ventures, Inc. in Opposition to Debtors Motion to Adjourn Adversary Proceeding, or in the Alternative, for an Extension of Time to Answer or Otherwise Response to Plaintiffs Adversary Complaint [ECF No. 6]
- E. Motion of Sears Holdings Corporation to Dismiss Adversary Proceeding [ECF No. 12]
- F. Declaration of Jennifer Brooks Crozier, Esq. in Support of Motion of Sears Holdings Corporation to Dismiss Adversary Proceeding [ECF No. 13]
- G. Plaintiff's Response in Opposition to Debtors' Motion to Dismiss the Adversary Complaint [Case No. 18-23538, ECF No. 7457]
- H. Reply in Further Support of Debtors' Motion to Dismiss the Adversary Complaint re: VIR/AMI Adversary Proceeding [ECF No. 15 & Case No. 18-23538, ECF No. 7487]

Status: This matter is going forward.

II. UNCONTESTED MATTERS:

2. Debtors' Sixth Omnibus Objection to Proofs of Claim (Satisfied Claims)
[ECF No. 5075]

Response Deadline: September 26, 2019 at 4:00 p.m. (Eastern Time)

Response Filed:

- A. Limited Response and Reservation of Rights of Transform
Holdco LLC [ECF No. 5240]

Related Documents:

- B. Notice of Withdrawal Regarding Debtors' Sixth Omnibus
Objection [ECF No. 5453]
- C. Order Granting Debtors' Sixth Omnibus Objection to Proofs of
Claim [ECF No. 5999]
- D. Notice of Withdrawal & Adjournment [ECF No. 6376]

Status: This matter is going forward on an uncontested basis solely with respect
to the remaining three claims of Salesforce.com (claims no. 5874, 5875 and 5876).

3. Motion of Santa Rosa Mall, LLC for Extension of Time to File Memorandum of
Law in Compliance with Court Order [ECF No. 7448]

Response Deadline: March 16, 2020 at 4:00 p.m. (Eastern Time)

Responses Filed: None.

Related Documents: None.

Status: This matter is going forward on an uncontested basis.

4. Notice of De Minimis Asset Sale for Membership Interest in Clayton Street
Associates, LLC [ECF No. 7335]

Response Deadline: March 4, 2020 at 4:00 p.m. (Eastern Time); extended to
March 11, 2020 at 4:00 p.m. for certain parties.

Response Filed:

- A. Objection of Broe Real Estate Group [ECF No. 7340]

Related Documents:

- B. Stipulation and Agreement by and Between Debtors and Broe Real Estate Group Resolving Objection [ECF No. 7505]
- C. Notice of Hearing [ECF No. 7489]

Status: This matter is going forward on an uncontested basis. A stipulation resolving Broe Real Estate Group's Objection has been filed and will be presented to the Court for approval.

III. CONTESTED MATTER:

- 5. Motion Addendum of Julie Independence Tomchak for Original Motion Document #4209 [ECF No. 5483]

Response Deadline: March 16, 2020 at 4:00 p.m. (Eastern Time)

Response Filed:

- A. Debtors' Objection [ECF No. 7475]

Related Documents:

- B. Motion to Address Objections in Sears Bankruptcy [ECF No. 4209]
- C. Motion for Acceptance for Delayed Response due to Mailing Address Forwards and Disability [ECF No. 4210]
- D. Motion for Telephonic Hearing [ECF No. 4211]
- E. Motion for Telephonic Hearing [ECF No. 5484]

Status: This matter is going forward on a contested basis.

IV. ADJOURNED MATTERS:

- 6. Motion of Debtors for Entry of an Order Extending the Automatic Stay to Certain Non-Debtor Parties [ECF No. 924]

Response Deadline: November 13, 2018 at 4:00 p.m. (Eastern Time)

Response Filed:

- A. Objection by Debbie and Dennis Dodge [ECF No. 2892]

Related Documents:

- B. Debtors' Reply [ECF No. 1296]
- C. Order Extending the Automatic Stay to Certain Non-Debtor Parties [ECF No. 1528]
- D. Debtors' Reply to Smith Objection [ECF No. 1550]
- E. Notice of Extension of the Automatic Stay to Supplemental Parties and Supplemental Actions [ECF No. 2754]

Status: This matter has been adjourned to a date to be determined.

- 7. Motion of Certain Utility Companies to Determine Adequate Assurance of Payment Pursuant to Section 366(c) of the Bankruptcy Code [ECF No. 1395]

Response Deadline: January 11, 2019 at 4:00 p.m. (Eastern Time)

Responses Filed:

- A. Debtors' Objection [ECF No. 2451]
- B. Reply of Certain Utility Companies to Debtors' Objection [ECF No. 2830]

Related Documents:

- C. Joinder of Jackson EMC [ECF No. 1533]
- D. Declaration of Sherry R. Ward in Support [ECF No. 2433]
- E. Declaration of Wanda Shirley in Support [ECF No. 2434]
- F. Declaration of Enobong Enyenihi in Support [ECF No. 2436]
- G. Declaration of Karen Palmieri in Support [ECF No. 2438]
- H. Declaration of Walt Larnerd in Support [ECF No. 2440]
- I. Declaration of Lisa R. Holland in Support [ECF No. 2441]
- J. Declaration of Aldo Rojas in Support [ECF No. 2442]
- K. Declaration of Marrissa Hinton in Support [ECF No. 2444]
- L. Declaration of Dwight C. Snowden in Support [ECF No. 2447]

- M. Declaration of Jennifer Davy in Support [ECF No. 2458]
- N. Declaration of Emory L. Roberts Jr. in Support [ECF No. 2459]
- O. Declaration of Louise Williams in Support [ECF No. 2460]
- P. Declaration of Dora Hargrove in Support [ECF No. 2461]
- Q. Declaration of Carlandra Edwards in Support [ECF No. 2462]
- R. Declaration of Brent Cochran in Support [ECF No. 2463]
- S. Declaration of Stephanie Lemmond in Support [ECF No. 2467]
- T. Declaration of Jennifer Woehrle in Support [ECF No. 2484]
- U. Declaration of Michael W. Franklin in Support [ECF No. 2490]
- V. Declaration of Vincent Albanito in Support [EF No. 2500]
- W. Declaration of Gerald Houck in Support [ECF No. 2501]
- X. Declaration of Vicki Piazza in Support [ECF No. 2515]

Status: This matter has been adjourned to April 29, 2020 at 10:00 a.m.

- 8. Debtors' First Omnibus Objection to Proofs of Claim (Satisfied Claims) [ECF No. 4775]

Response Deadline: August 27, 2019 at 4:00 p.m. (Eastern Time)

Responses Filed:

- A. Response of Johnson Controls, Inc. to Debtors' First Omnibus Objection to Claims [ECF No. 4983]
- B. Shaw Industries, Inc.'s Opposition Regarding Debtors' First Omnibus Objection to Proofs of Claim (Satisfied Claims) [ECF No. 5156]

Related Documents:

- C. Notice of Withdrawal [ECF No. 5444]
- D. Order Granting Debtors' First Omnibus Objection [ECF No. 6019]
- E. Notice of Withdrawal & Adjournment [ECF No. 7306]

F. Supplemental Order Granting Debtors' First Omnibus Objection
[ECF No. 7341]

Status: This matter has been adjourned to April 29, 2020 at 10:00 a.m.

9. Debtors' Second Omnibus Objection to Proofs of Claim (Reclassification as
General Unsecured Claims) [ECF No. 4776]

Response Deadline: August 27, 2019 at 4:00 p.m. (Eastern Time)

Responses Filed:

- A. Claimants' Response to Omnibus Objection [ECF No. 4814]
- B. Response of VM Innovations to Second Omnibus Objection to
Proofs of Claim [ECF No. 4986]
- C. Objection of Suzanne Jewelers [ECF No. 4994]
- D. Response of ShopChimney.com Inc. to Second Omnibus Objection
to Proofs of Claim [ECF No. 5003]
- E. Response of VIR Ventures, Inc. to Second Omnibus Objection to
Proofs of Claim [ECF No. 5056]
- F. Response of Sky Billiards, Inc. d/b/a Best Choice Products in
Opposition to Debtors' Second Omnibus Objection [ECF No. 5421]
- G. Response of Stolaas Company in Opposition to Debtors' Second
Omnibus Objection to Proofs of Claim [ECF No. 5524]
- H. Motion to Dismiss Adversary Proceeding and Debtors' Reply to
Opposition [ECF No. 7367]

Related Documents:

- I. Order Granting Debtors' Second Omnibus Objection [ECF
No. 5997]
- J. Notice of Withdrawal & Adjournment [ECF No. 7307]
- K. Declaration of Jennifer Brooks Crozier, Esq in Support [ECF No.
7368]

Status: This matter has been adjourned to April 29, 2020 at 10:00 a.m.

10. Debtors' Ninth Omnibus Objection to Proofs of Claim (Reclassification as General Unsecured Claims) **[ECF No. 5236]**

Response Deadline: October 16, 2019 at 4:00 p.m. (Eastern Time)

Responses Filed:

- A. Eric Jay Ltd.'s Opposition **[ECF No. 5498]**
- B. Eric Jay Ltd.'s Opposition **[ECF No. 5508]**

Related Documents:

- C. Order Granting Debtors' Ninth Omnibus Objection **[ECF No. 6043]**
- D. Notice of Withdrawal & Adjournment **[ECF No. 6379]**
- E. Notice of Adjournment **[ECF No. 7310]**

Status: This matter has been adjourned to April 29, 2020 at 10:00 a.m.

11. Debtors' Tenth Omnibus Objection to Proofs of Claim (To Reclassify Claims) **[ECF No. 5237]**

Response Deadline: October 16, 2019 at 4:00 p.m. (Eastern Time)

Responses Filed:

- A. Infiloom India Private Limited's Response **[ECF No. 5394]**
- B. Winners Industry Company, Ltd.'s Response **[ECF No. 5400]**
- C. Orient Craft Ltd.'s Opposition **[ECF No. 5496]**
- D. Orient Craft Ltd.'s Opposition **[ECF No. 5497]**
- E. Response of HK Sino-Thai Trading Company LTD **[ECF No. 6037]**
- F. Debtors' Omnibus Reply in Support **[ECF No. 6372]**

Resolved Responses:

- G. Allure Home Creations Co. Inc.'s Response **[ECF No. 5392]**
- H. Arca Industrial (NJ), Inc.'s Response **[ECF No. 5476]**
- I. Hain Capital Investors Master Fund, Ltd.'s Reply **[ECF No. 5480]**
- J. BST International Fashion Ltd.'s Response **[ECF No. 5481]**

- K. Response of E-Land Apparel Ltd and Thanh Cong Textile Garment Investment Trading Joint Stock Company [ECF No. 5485]
- L. Weihai Lianqiao International Co. Group Co., Ltd.'s Reply [ECF No. 5488]
- M. Response of Mien Co., Ltd., A&A (HK) Industrial Limited, Esjay International Private Limited, Shanghai Fochier International Trade Co., and Vogue Tex (Pvt) Ltd. [ECF No. 5494]
- N. Clement Cheng's Response [ECF No. 5520]
- O. Giza Spinning and Weaving Co.'s Response [ECF No. 5565]
- P. Limited Statement of Icon Health & Fitness, Inc. [ECF No. 6014]
- Q. Supplemental Response of Mien Co., Ltd., A&A (HK) Industrial Limited, Esjay International Private Limited, Shanghai Fochier International Trade Co., and Vogue Tex (Pvt) Ltd. [ECF No. 6165]

Related Documents:

- R. Debtors' Omnibus Reply in Support of Debtors' Tenth Omnibus Objection to Proofs of Claim (To Reclassify Claims) [ECF No. 6372]
- S. Response of Superb International Co., Ltd. [ECF No. 6094]
- T. Declaration of Howard Yuan in Support of Response [ECF No. 6095]
- U. Response of Superb International Co., Ltd. [ECF No. 6098]
- V. Declaration of Howard Yuan in Support of Response [ECF No. 6099]
- W. Declaration of David G. Tobias in Support of Response [ECF No. 6100]
- X. Order Granting Debtors' Tenth Omnibus Objection [ECF No. 6076]

Status: This matter has been adjourned to April 29, 2020 at 10:00 a.m.

- 12. Motion for Relief from Stay [ECF No. 5417]

Response Deadline: March 16, 2020 at 4:00 p.m. (Eastern Time)

Responses Filed: None.

Related Document:

- A. Stipulation and Order by and Among Debtors, Transform, and Calabrio, Inc. **[ECF No. 6392]**

Status: This matter has been adjourned to April 29, 2020 at 10:00 a.m.

- 13. CenturyLink Communications, LLC's Combined Motion for Administrative Expense Claim Pursuant to 11 U.S.C. §§ 503(b)(1)(A) and 365(d)(5); Application for Payment of Adequate Assurance Pursuant to Section 7 of the Utility Order [Dkt. No. 461]; Objection to Motion of Debtors Requesting Release of Adequate Assurance Deposit Amounts Pursuant to the Adequate Assurance Procedures **[ECF No. 7299]**

Response Deadline: March 18, 2020 at 4:00 p.m. (Eastern Time)

Response Filed:

- A. Debtors' Reply to Objection **[ECF No. 7319]**

Related Document:

- B. Limited Withdrawal of Objection **[ECF No. 7324]**

Status: This matter has been adjourned to April 29, 2020 at 10:00 a.m.

- 14. Debtors' Fifth Omnibus Objection to Proofs of Claim (Reclassification as General Unsecured Claims **[ECF No. 5031]**

Response Deadline: October 9, 2019 at 4:00 p.m. (Eastern Time)

Response Filed:

- A. Objection of CalAmp Wireless Networks Corporation **[ECF No. 5186]**

Related Documents:

- B. Order Granting Debtors' Fifth Omnibus Objection **[ECF No. 5994]**

- C. Notice of Withdrawal & Adjournment **[ECF No. 7308]**

Status: This matter has been adjourned to April 29, 2020 at 10:00 a.m.

15. Motion of Santa Rosa Mall, LL for an Order Finding the Automatic Stay Inapplicable or, in the Alternative, for Relief from the Automatic Stay and Memorandum in Support Thereof [ECF No. 6317]

Response Deadline: February 10, 2020

Response Filed:

- A. Debtors' Objection [ECF No. 7211]

Related Documents:

- B. Reply of Santa Rosa Mall, LLC [ECF No. 7311]
C. Statement of Santa Rosa Mall, LLC Certifying Compliance [ECF No. 7326]

Status: This matter has been adjourned to April 29, 2020 at 10:00 a.m.

16. Debtors' Eleventh Omnibus Objection to Proofs of Claim (to Reclassify or Disallow Certain Claims) [ECF No. 7213]

Response Deadline: March 3, 2020 at 4:00 p.m. (Eastern Time)

Responses Filed:

- A. Response of BH North American Corporation in Opposition [ECF No. 7359]
B. Response in Opposition of KG Denim Limited [ECF No. 7369]
C. Response of Icon Health & Fitness, Inc. [ECF No. 7371]
D. Response of Xiamen Luxinjia Imp & Exp Co Ltd. in Opposition [ECF No. 7372]
E. South Pacific Fashions Ltd.'s Reservation of Rights in Response to Debtors' Eleventh Omnibus [ECF No. 7455]
F. Joinder of GTM America Corporation to Responses of BH North American Corporation, KG Denim Limited, Icon Health & Fitness, Inc., and Xiamen Luxinjia Imp & Exp Co. LTD. [ECF No. 7474]

Related Documents:

- G. Declaration of Benny Wang in Support of LXJ's Opposition [ECF No. 7373]
H. Certificate of No Objection [ECF No. 7383]

I. Order Granting Debtors' Eleventh Omnibus Objection [ECF No. 7393]

Status: This matter has been adjourned to April 29, 2020 at 10:00 a.m.

17. Debtors' Twelfth Omnibus Objection to Proofs of Claim and Ballots (No Liability Claims) [ECF No. 7301]

Response Deadline: March 10, 2020 at 4:00 p.m. (Eastern Time)

Response Filed:

A. First Response of Weavetex Overseas [ECF No. 7420]

Related Documents:

B. Certificate of No Objection [ECF No. 7425]

C. Order Granting Debtors' Twelfth Omnibus Objection [ECF No. 7445]

Status: This matter has been adjourned to April 29, 2020 at 10:00 a.m.

18. Debtors' Thirteenth Omnibus Objection to Proofs of Claim (Reclassify or Disallow Claims) [ECF No. 7302]

Response Deadline: March 10, 2020 at 4:00 p.m. (Eastern Time)

Response Filed:

A. Response of Koolatron Corporation [ECF No. 7408]

Related Documents:

B. Certificate of No Objection [ECF No. 7424]

C. Order Granting Debtors' Thirteenth Omnibus Objection [ECF No. 7444]

Status: This matter has been adjourned to April 29, 2020 at 10:00 a.m.

19. Motion of Fuzhou Fushan Pneumatic Co., Ltd. to Reconsider FRCP 60 or FRBP 3008 Order Granting Debtors' Tenth Omnibus Objection to Proofs of Claim [ECF No. 6090]

Response Deadline: January 21, 2020 at 4:00 p.m. (Eastern Time)

Responses Filed: None.

Related Documents: None.

Status: This matter has been adjourned to April 29, 2020 at 10:00 a.m.

20. Motion to Approve Motion of Relator Carl Ireland, Administrator of the Estate of James Garbe, for an Order (I) Determining the Value of Relator's Collateral as of the Sale of Such Collateral; (II) Determining the Amount of Any Diminution in the Amount of the Sales Proceeds Allocable to Such Collateral After the Sale; (III) Directing Payment of Relator's Secured and Superpriority Administrative Claims; and (IV) Granting Related Relief [ECF No. 4931]

Response Deadline: March 18, 2020 at 4:00 p.m. (Eastern Time)

Response Filed:

- A. Debtors' Objection [ECF No. 7471]

Related Documents: None.

Status: This matter has been adjourned to April 29, 2020 at 10:00 a.m.

V. WITHDRAWN MATTERS:

21. Application of National Grid Pursuant to Section 7 of the Order (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment to Utility Providers, (II) Establishing Procedures for Determining Adequate Assurance of Payment for Future Utility Services, and (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Service [Docket No. 461] for Payment from the Adequate Assurance Account [ECF No. 3238]

Response Deadline: December 6, 2019 at 4:00 p.m. (Eastern Time)

Responses Filed: None

Related Document:

- A. Notice of Withdrawal [ECF No. 7338]

Status: This matter has been withdrawn.

22. Application of Infinite Energy for Payment of Adequate Assurance Deposit, in the amount of \$12,922.65, Currently Held in Trust [ECF No. 6241]

Response Deadline: March 18, 2020 at 4:00 p.m. (Eastern Time)

Responses Filed: None.

Related Document:

A. Notice of Withdrawal [ECF No. 7464]

Status: This matter has been withdrawn.

Dated: March 24, 2020
New York, New York

/s/ Garrett A. Fail
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