

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

CLOVER TECHNOLOGIES GROUP, LLC, *et al.*,¹

Debtors.

)
)
)
)
)
)
)

Chapter 11

Case No. 19-12680 (KBO)

(Joint Administration Requested)

NOTICE OF HEARING ON FIRST DAY MOTIONS

PLEASE TAKE NOTICE that on December 16, 2019 (the “Petition Date”), each of the above-captioned debtors and debtors in possession (the “Debtors”) filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), with the Clerk of the United States Bankruptcy Court for the District of Delaware. The Debtors are continuing to operate their businesses and manage their affairs as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE that together with their chapter 11 petitions, the Debtors also filed the following applications and motions set forth below (collectively, the “First Day Matters”):

First Day Declaration

1. Declaration of Andrew Buck, Chief Financial Officer of Clover Wireless, LLC, in Support of the Chapter 11 Petitions and First Day Motions [Docket No. 18, Filed December 17, 2019]

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Clover Technologies Group, LLC (9236); 4L Holdings Corporation (0292); 4L Technologies Inc. (5035); Clover Ithaca Properties, LLC (9236); Refurb Holdings, LLC (1230); Clover Wireless, LLC (0313); and Valu Tech Outsourcing, LLC (3563). The location of the Debtors’ service address in these chapter 11 cases is: 5850 Granite Parkway, Suite 720, Plano, Texas 75024.

First Day Matters

2. Debtors' Motion for Entry of an Order Directing Joint Administration of Chapter 11 Cases [Docket No. 3, Filed December 16, 2019]
3. Debtors' Application for Appointment of Stretto as Claims and Noticing Agent [Docket No. 7, Filed December 17, 2019]
4. Debtors' Motion for Entry of an Order (I) Scheduling a Combined Disclosure Statement Approval and Plan Confirmation Hearing, (II) Approving the Solicitation Procedures and Dates, Deadlines, and Notices Related Thereto, (III) Directing That a Meeting of Creditors not be Convened, and (IV) Waiving the Requirements to File Statements of Financial Affairs and Schedules of Assets and Liabilities [Docket No. 6, Filed December 17, 2019]
5. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral, (II) Granting Adequate Protection to the Secured Parties, (III) Modifying the Automatic Stay, and (IV) Scheduling a Final Hearing [Docket No. 8, Filed December 17, 2019]
6. Debtors' Motion for Entry of Interim and Final Orders Authorizing the Debtors to (I) Continue to Operate Their Cash Management System, (II) Maintain Existing Business Forms, and (III) Perform Intercompany Transactions [Docket No. 9, Filed December 17, 2019]
7. Debtors' Motion for Entry of Interim and Final Orders (I) Determining Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services, and (III) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests [Docket No. 10, Filed December 17, 2019]
8. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Maintain and Administer Their Existing Customer Programs and (II) Honor Certain Prepetition Obligations Related Thereto [Docket No. 11, Filed December 17, 2019]
9. Debtors' Motion for Entry of an Order Authorizing Payment of Certain Prepetition Claims in the Ordinary Course of Business [Docket No. 12, Filed December 17, 2019]
10. Debtors' Motion for Entry of Interim and Final Orders Authorizing the Debtors to (I) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Expenses and (II) Continue Employee Benefits Programs [Docket No. 13, Filed December 17, 2019]
11. Debtors' Motion for Entry of Interim and Final Orders Authorizing the Debtors to (I) Pay Their Obligations Under Prepetition Insurance Policies, (II) Continue to Pay Certain Brokerage Fees, (III) Renew, Supplement, Modify, or Purchase Insurance Coverage, and (IV) Enter into New Financing Agreements in the Ordinary Course of Business [Docket No. 14, Filed December 17, 2019]

12. Debtors' Motion for Entry of Interim and Final Orders Authorizing the Payment of Certain Prepetition Taxes and Fees [Docket No. 15, Filed December 17, 2019]
13. Debtors' Motion for Entry of Interim and Final Orders (I) Approving Notification and Hearing Procedures for Certain Transfers of and (II) Declarations of Worthlessness with Respect to Common Stock [Docket No. 16, Filed December 17, 2019]
14. Debtors' Motion Seeking Entry of Interim and Final Orders Authorizing the Debtors to (I) File A Consolidated List of Creditors in Lieu of Submitting A Separate Mailing Matrix for Each Debtor, (II) File A Consolidated List of the Debtors' Thirty Largest Unsecured Creditors, (III) Redact Certain Personal Identification Information for the Debtors' Employees and European Union Member Countries' Citizens, and (IV) Limiting Notice Required Under Bankruptcy Rule 2002 [Docket No. 17, Filed December 17, 2019]

PLEASE TAKE FURTHER NOTICE that a hearing to consider the First Day Motions (the "First Day Hearing") will be held on **December 18, 2019, at 4:00 p.m. (prevailing Eastern Time)**, before the Honorable Karen B. Owens at the United States Bankruptcy Court for the District of Delaware (the "Court"), located at 824 North Market Street, 6th Floor, Courtroom No. 3, Wilmington, Delaware 19801. Any party who wishes to attend the First Day Hearing telephonically is required to make arrangements through Court Call by telephone (866-582-6878) or by facsimile (866-533-2946).

PLEASE TAKE FURTHER NOTICE that copies of the First Day Matters may be obtained free of charge by visiting the website of the Debtors' proposed notice and claims agent, Stretto, at <https://cases.stretto.com/clover>. Further information may be obtained by calling Stretto at: 855-923-0996 (toll-free; domestic) or 949-341-7245 (international) or emailing at TeamClover@stretto.com. You may also obtain copies of any pleadings by visiting the Court's website at <http://www.deb.uscourts.gov> in accordance with the procedures and fees set forth therein.

PLEASE TAKE FURTHER NOTICE that any and all objections to the First Day Matters may be made at the First Day Hearing.

Dated: December 17, 2019
Wilmington, Delaware

/s/ *Domenic E. Pacitti*

Domenic E. Pacitti (DE Bar No. 3989)
Michael W. Yurkewicz (DE Bar No. 4165)
KLEHR HARRISON HARVEY BRANZBURG LLP
919 N. Market Street, Suite 1000
Wilmington, Delaware 19801
Telephone: (302) 426-1189
Facsimile: (302) 426-9193
Email: dpacitti@klehr.com
myurkewicz@klehr.com

-and-

Morton R. Branzburg (*pro hac vice* pending)
KLEHR HARRISON HARVEY BRANZBURG LLP
1835 Market Street, Suite 1400
Philadelphia, Pennsylvania 19103
Telephone: (215) 569-3007
Facsimile: (215) 568-6603
Email: mbranzburg@klehr.com

-and-

Joshua A. Sussberg, P.C. (*pro hac vice* pending)
Matthew C. Fagen (*pro hac vice* pending)
KIRKLAND & ELLIS LLP
KIRKLAND & ELLIS INTERNATIONAL LLP
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-4900
Email: joshua.sussberg@kirkland.com
matthew.fagen@kirkland.com

Proposed Co-Counsel for the Debtors and Debtors in Possession