IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
CLOVER TECHNOLOGIES GROUP, LLC, et al., 1) Case No. 19-12680 (KBO)
Debtors.)) (Joint Administration Requested)

NOTICE OF AGENDA FOR HEARING ON FIRST DAY MOTIONS SCHEDULED FOR DECEMBER 18, 2019, AT 4:00 P.M. (PREVAILING EASTERN TIME)²

Date and Time of Hearing: Wednesday, December 18, 2019 at 4:00 p.m. (prevailing Eastern

Time).

Location of Hearing: The Honorable Judge Karen B. Owens Bankruptcy Judge, United

States Bankruptcy Court for the District of Delaware, 824 Market Street, 6th Floor, Courtroom No. 3,

Wilmington, Delaware 19801.

Copies of Motions: A copy of each pleading can be viewed on the Court's website at

https://ecf.deb.uscourts.gov and on the website of the Debtors' notice and claims proposed agent, Stretto. at https://cases.stretto.com/clover. Further information may obtained by calling Stretto at: 855-923-0996 (toll-free; domestic) 949-341-7245 (international) emailing or or at

TeamClover@stretto.com.

This agenda sets forth items in the order they appear in the first day motions binders delivered to the Court. The status of each is set forth below.

- 1. Voluntary Chapter 11 Petitions
 - A. Clover Technologies Group, LLC
 - B. 4L Holdings Corporation

The Debtors in these chapter 11 cases, a long 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.

Any party who wishes to attend telephonically is required to make arrangements through CourtCall by telephone (866-582-6878) or by facsimile (866-533-2946).

- C. 4L Technologies Inc.
- D. Clover Ithaca Properties, LLC
- E. Refurb Holdings, LLC
- F. Clover Wireless, LLC
- G. Valu Tech Outsourcing, LLC
- 2. **First Day Declaration.** 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]

<u>Status</u>: The Declaration will be relied upon as evidentiary support for the first day matters listed below.

MATTERS GOING FORWARD:

3. **Joint Administration Motion.** Debtors' Motion for Entry of an Order Directing Joint Administration of Chapter 11 Cases [Docket No. 3]

<u>Status</u>: This matter is going forward.

4. **Stretto 156(c) Retention Application.** Debtors' Application for Appointment of Stretto as Claims and Noticing Agent [Docket No. 7]

Status: This matter is going forward.

5. Combined Disclosure Statement and Plan Confirmation Motion. 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 Liabilities [Docket No. 6]

Status: This matter is going forward.

6. Cash Collateral Motion. 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]

<u>Status</u>: This matter is going forward with respect to an interim order.

7. Cash Management Motion. 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]

Status: This matter is going forward with respect to an interim order.

8. **Utilities Motion.** 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].

Status: This matter is going forward with respect to an interim order.

9. **Customer Programs Motion.** 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]

<u>Status</u>: This matter is going forward with respect to an interim order.

10. **All Claims Motion**. Debtors' Motion for Entry of an Order Authorizing Payment of Certain Prepetition Claims in the Ordinary Course of Business [Docket No. 12]

Status: This matter is going forward.

11. **Wages Motion.** 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]

Status: This matter is going forward with respect to an interim order.

12. **Insurance Motion.** 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]

<u>Status</u>: This matter is going forward with respect to an interim order.

13. **Taxes Motion.** Debtors' Motion for Entry of Interim and Final Orders Authorizing the Payment of Certain Prepetition Taxes and Fees [Docket No. 15]

Status: This matter is going forward with respect to an interim order.

14. **NOL Motion.** 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]

<u>Status</u>: This matter is going forward with respect to an interim order.

15. Creditor Matrix Motion. 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]

Status: This matter is going forward with respect to an interim order.

MATTERS GOING FORWARD FOR SCHEDULING PURPOSES:

16. **Chapter 11 Plan.** Joint Prepackaged Chapter 11 Plan of Reorganization of Clover Technologies Group, LLC and its Debtor Affiliates [Docket No. 4]

<u>Status</u>: This matter is going forward for scheduling purposes only.

17. **Disclosure Statement.** Disclosure Statement for the Joint Prepackaged Chapter 11 Plan of Reorganization of Clover Technologies Group, LLC and its Debtor Affiliates [Docket No. 5]

Status: This matter is going forward for scheduling purposes only.

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Dated: December 17, 2019 Wilmington, Delaware

/s/ Domenic E. Pacitti

Domenic E. Pacitti (DE Bar No. 3989) Michael W. Yurkewicz (DE Bar No. 4165)

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