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**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION**

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| <p>In re:</p> <p>CORNERSTONE APPAREL, INC., d/b/a Papaya Clothing,</p> <p align="right">Debtor(s).</p> | <p>CASE NO.: 2:17-bk-17292-VZ CHAPTER: 11</p> <p align="center">NOTICE OF MOTION AND MOTION TO APPROVE ADEQUACY OF DISCLOSURE STATEMENT OF DEBTOR WHO IS NOT AN INDIVIDUAL</p> <p align="center">[11 U.S.C. § 1125; FRBP 3017; LBR 3017-1]</p> <p>Hearing Information DATE: December 14, 2017 TIME: 11:00 a.m. COURTROOM: 1368, Roybal Federal Building ADDRESS: 255 E. Temple Street, Los Angeles, CA 90012</p> |
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- Disclosure Statement: Pursuant to FRBP 3016(b), a Disclosure Statement and Plan of Reorganization (the “**DS and Plan**”) was filed as docket entry # 204. The DS and Plan are combined into one document to avoid contradiction and confusion. A copy of the DS and Plan accompanies this notice. **Sections I – VII and XI of the DS and Plan** constitute the disclosure statement (the “**DS**”) and sections VIII –XI of the DS and Plan constitute the Plan.
- Proponent of Disclosure Statement: The party who filed the DS and Plan (“Proponent”) is: Debtor, or .
- Motion to Approve Disclosure Statement: Pursuant to FRBP 9014(a), the Debtor filed a motion requesting that the court approve the adequacy of their disclosure statement (“**Motion to Approve DS**”). The Motion to Approve DS is being served only on the U.S. trustee as required by FRBP 9034(h), and on the debtor.
- Hearing on Motion to Approve Disclosure Statement: The Motion to Approve DS is being heard on 21 days of notice pursuant to LBR 9013-1(d). In addition, pursuant to LBR 3017-1, on (date) 10/31/17 a Notice of Hearing on Adequacy of Disclosure Statement was filed and served to provide 42 days of notice of the hearing to the U.S. trustee, the debtor, and to all claimants and parties in interest.

This form has been approved for use in chapter 11 cases assigned to Judge Vincent P. Zurzolo.

5. **Filing and Serving a Response:** All claimants and parties in interest may file a response to the Motion to Approve DS. If you wish to oppose the Motion to Approve DS, you must file and serve a written response no later than 14 days before the hearing and appear at the hearing. When serving a response, serve it on the debtor, debtor's attorney and the proponent's attorney (if the debtor is not the proponent) at the addresses set forth below. If you fail to file a written response or appear at the hearing, the court may treat such failure as a waiver of your right to oppose the Motion to Approve DS and may approve the DS.

a. **DEADLINE:** (date) November 30, 2017

b. **DEBTOR'S ADDRESS:** Cornerstone Apparel, Inc., 5807 Smithway Street, Los Angeles, CA 90040

c. **DEBTOR'S ATTORNEY'S ADDRESS:**

Do not mail the response. The Debtor's attorney will be served by Notice of Electronic Filing; or

Mailing Address:

d. **PROPONENT'S ATTORNEY'S ADDRESS** (If Proponent is not the Debtor):

Do not mail the response. The Proponent's attorney will be served by Notice of Electronic Filing; or

Mailing Address:

Date: November 20, 2017



Signature of Debtor

Tae Y. Yi, President & Chief Financial Officer of the Debtor

Printed name of Debtor

Date: November 20, 2017

/s/ Eve H. Karasik

Signature of attorney for Debtor

Eve H. Karasik, Esq.

Printed name of attorney for Debtor

MOTION TO APPROVE ADEQUACY OF DISCLOSURE STATEMENT

1. 11 U.S.C. § 1125 requires that adequate information be disclosed with the Plan, to provide information for claimants to decide whether to submit a ballot to accept or reject the plan, or to file an objection to confirmation. **Sections I – VII and IX of the DS and Plan** contain this disclosure.
2. **Points and Authorities:** Attached is an optional points and authorities.
3. **Amended Disclosure Statement and/or Plan:**
 - Attached is an Amended DS and Plan that was filed after the Notice of Hearing on Adequacy of Disclosure Statement was filed. Also attached is a description of the reasons for filing an Amended D/S and Plan.
 - Additional Evidence:** Attached is additional evidence to support granting the Motion to Approve DS.
 - a. **Declarations [LBR 9013-1(i)]**
 - Proponent of the DS and Plan
 - Person who completed service of the Notice of Hearing on Adequacy of Disclosure Statement
 - Other:
 - b. **Documents Authenticated by Declarations [LBR 9013-1(c)(3)(A)]**
 - Exhibit A:
 - Exhibit B:
 - Exhibit C:
4. Based on the foregoing, the Proponent of the DS and Plan requests that the court enter an order approving the adequacy of the disclosure statement.

Date: November 20, 2017



Signature of Debtor

Tae Y. Yi, President & Chief Financial Officer of the Debtor

Printed name of Debtor

Date: November 20, 2017

/s/ Eve H. Karasik

Signature of attorney for Debtor

Eve H. Karasik, Esq.

Printed name of attorney for Debtor

1 TIMOTHY J. YOO (SBN 155531)
2 EVE H. KARASIK (SBN 155356)
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6 Attorneys for Chapter 11 Debtor and
7 Debtor in Possession

9 **UNITED STATES BANKRUPTCY COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION**

12 In re) Case No. 2:17-bk-17292-VZ
13)
14 CORNERSTONE APPAREL, INC.) Chapter 11
15 d/b/a Papaya Clothing,) **MEMORANDUM OF POINTS AND**
16 Debtor.) **AUTHORITIES IN SUPPORT OF**
17) **MOTION TO APPROVE ADEQUACY**
18) **OF DISCLOSURE STATEMENT**
19)
20) Date: December 14, 2017
21) Time: 11:00 a.m.
22) Courtroom: 1368
23) Location: 255 E. Temple Street
24) Los Angeles, California
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MEMORANDUM OF POINTS AND AUTHORITIES

I.

INTRODUCTION

Cornerstone Apparel, Inc., a California corporation d/b/a Papaya Clothing and the debtor and debtor-in-possession herein (the “Debtor”), filed its motion (the “Motion”) to approve the adequacy of its proposed Disclosure Statement (the “Disclosure Statement,” and together with the Plan, the “DS and Plan”) on November 20, 2017.¹ This Memorandum of Points and Authorities (“Memorandum”) is filed in support of the Motion’s request for approval of the Disclosure Statement, and proposes various solicitation and tabulation procedures for voting on the Plan, the forms of ballots to be used in connection therewith, the manner of notice proposed by the Debtor, the plan confirmation hearing date, and various confirmation-related deadlines. The Debtor believes that the Disclosure Statement contains “adequate information,” as that phrase is defined in Section 1125(a)(1) of 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”). The Debtor further believes that the procedures and deadlines outlined below are fair and reasonable, and comply with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedures (the “Bankruptcy Rules”), the Local Bankruptcy Rules for the United States Bankruptcy Court for the Central District of California (the “Local Rules”), and this Court’s *Order . . . (6) Establishing Procedure for (A) Motion For Order Approving Adequacy of Disclosure Statement; and (B) Motion for Order Confirming Plan* entered on June 19, 2017 (the “DS and Plan Order”).

The Debtor respectfully requests that the Court grant the Motion and approve the Disclosure Statement as well as the solicitation and tabulation procedures and deadlines set forth in this Memorandum.

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¹ The Debtor drafted the Disclosure Statement using the Court’s approved combined form of *Disclosure Statement and Plan of Reorganization of A Debtor Who Is Not An Individual* [11 U.S.C. §§ 1123, 1125] (the “DS and Plan”) [Doc. No. 204]. All capitalized terms not defined herein shall have the meanings ascribed to them in the DS and Plan filed concurrently herewith.

1 II.

2 **BACKGROUND REGARDING THE DEBTORS**

3 On June 15, 2017 (the "Petition Date"), the Debtor filed a voluntary petition for relief
4 under Chapter 11 of 11 U.S.C. §§ 101 *et seq.* (the "Bankruptcy Code"). The Debtor is continuing
5 to operate its business, manage its financial affairs and operate its bankruptcy estate as a debtor in
6 possession pursuant to Sections 1107 and 1108 of the Bankruptcy Code.

7 The Debtor operates a chain of apparel stores under the name Papaya Clothing ("Papaya")
8 that cater to teens, juniors and the "young at heart," and focuses on the 16 to 25 year old age
9 group. As of the Petition Date, the Debtor was operating over 80 stores located in malls and
10 shopping centers throughout the United States. The Papaya concept is to provide shoppers with
11 "great price, great service," and an "innovative, upscale and welcoming atmosphere."

12 The Debtor is based in Commerce, California with a 75,000 square feet headquarters
13 complex, which includes its warehouse and distribution facilities. The merchandise sold in the
14 Papaya stores is manufactured in the United States, and is housed in the Debtor's California
15 warehouse where the Debtor's employees pack and ship the merchandise to the retail locations.
16 Given the ever-changing fashion world, the Debtor has established a production line that can take
17 a new design from start to finish within a two-week period in order to give the customer an
18 impressive selection of the latest fashions.

19 The Debtor's ownership and management have over twenty-five years' experience in
20 operating retail clothing business focusing primarily in the junior and petite apparel markets. This
21 ownership and management team is responsible for the prior successes of retailers Everblue
22 Casuals and Career Image. The Debtor consistently leads in its retail category in sales per square
23 foot of retail space.

24 As of the Petition Date, the Debtor employed a workforce of approximately of 1,300
25 employees. In 2016, the Debtor generated annual gross revenues of more than \$134 million. The
26 Debtor has no secured debt.

27 After opening its first retail store approximately 18 years ago in 1999, the Debtor
28 substantially expanded its business operations to encompass a total of over 80 retail stores

1 throughout the United States by 2017. Approximately 50 of these new retail stores were opened
2 within the last six (6) years. The expansion effort took a heavy financial toll on the business
3 operations of the Debtor as a whole as it incurred construction and other “start up” costs with the
4 opening of each new store as well as a significant increase in operating expenses typically
5 associated with a retail store chain operation.

6 The high cost of expansion combined with decreasing store sales as a result of a general
7 industry-wide shift in consumer shopping preferences from in-store to online shopping, and the
8 resulting increased competition, left the Debtor with insufficient liquidity to meet all of its
9 financial obligations. While the Debtor had already closed a number of its less profitable retail
10 store locations, leaving open approximately 80 retail stores as of the Petition Date, the Debtor
11 required time to evaluate the viability of the remaining retail stores and identify other ways to
12 decrease operational costs and increase profitability. In order to preserve the Debtor’s rights
13 under its lease agreements and to have an opportunity to restructure its business and financial
14 affairs and ultimately reorganize, the Debtor filed this Chapter 11 bankruptcy case.

15 **III.**

16 **THE PLAN AND DISCLOSURE STATEMENT**

17 The Debtor filed the DS and Plan on October 31, 2017. As explained in the Disclosure
18 Statement, the Plan is a reorganization plan as it provides for the restructuring of the Debtor’s
19 obligations and distributions to creditors on the Plan Effective Date and over a five (5) year
20 period. The Reorganized Debtor will continue to operate its business after the Plan Effective
21 Date and will serve as the Disbursing Agent for the Plan.

22 The Debtor sets forth in the DS and Plan which classes of creditors are entitled to vote on
23 the Plan. Certain classes of claims (*i.e.*, Class 2 and Class 4a) are designated for voting purposes
24 as impaired and entitled to vote (each holder of such claim, a member of the “Voting Classes”),
25 and certain classes of claims (*i.e.*, Class 1a and Classes 3a-3g) are designated for voting purposes
26 as unimpaired, deemed to have accepted the Plan, and not entitled to vote (each holder of such
27 claim, a member of the “Unimpaired Nonvoting Classes”).
28

1 IV.

2 ARGUMENT

3 A. The Disclosure Statement Provides Adequate Information within the Meaning of
4 Section 1125 of the Bankruptcy Code.

5 Section 1125(b) of the Bankruptcy Code provides that “[a]n acceptance or rejection of a
6 plan may not be solicited after the commencement of the case under this title from a holder of a
7 claim or interest with respect to such claim or interest, unless, at the time of or before such
8 solicitation, there is transmitted to such holder the plan or a summary of the plan, and a written
9 disclosure statement approved, after notice and a hearing, by the court as containing adequate
10 information.” 11 U.S.C. § 1125(b). The Bankruptcy Code defines “adequate information” as
11 follows:

12 Information of a kind, and in sufficient detail, as far as is
13 reasonably practicable in light of the nature and history of the
14 records, including a discussion of the potential material Federal
15 tax consequences of the plan to the debtor, any successor to the
16 debtor, and a hypothetical investor typical of the holders of
17 claims or interests in the case, that would enable such
18 hypothetical investor of the relevant class to make an informed
19 judgment about the plan, but adequate information need not
20 include such information about any other possible or proposed
21 plan and in determining whether a disclosure statement provides
22 adequate information, the court shall consider the complexity of
23 the case, the benefit of additional information to creditors and
24 other parties in interest, and the cost of providing addition
25 information[.]

21 11 U.S.C. § 1125(a)(1).

22 The determination of whether a disclosure statement provides “adequate information” is
23 “subjective and made on a case by case basis ... [and] ... is largely within the discretion of the
24 bankruptcy court.” *In re Texas Extrusion Corp.*, 844 F.2d 1142, 1157 (5th Cir. 1988); *accord*,
25 *e.g.*, *Menard-Sanford v. Mabey (In re A.H. Robins Co.)*, 880 F.2d 694, 696 (4th Cir. 1989).
26 Nevertheless, in determining whether the “adequate information” requirements of section 1125(a)
27 have been satisfied in a particular case, courts frequently investigate whether the disclosure
28

1 statement provides descriptions of the following information to the extent applicable to the
2 particular proposed chapter 11 plan:

- 3 (1) the events which led to the filing of a bankruptcy petition;
- 4 (2) a description of the available assets and their value;
- 5 (3) the anticipated future of the company;
- 6 (4) the source of information stated in the disclosure statement;
- 7 (5) a disclaimer;
- 8 (6) the present condition of the debtor while in Chapter 11;
- 9 (7) the scheduled claims;
- 10 (8) the estimated return to creditors under a Chapter 7 liquidation;
- 11 (9) the accounting method utilized to produce financial information and the name of
12 the accountants responsible for such information;
- 13 (10) the future management of the debtor;
- 14 (11) the chapter 11 plan or a summary thereof;
- 15 (12) the estimated administrative expenses, including attorneys' and accountants' fees;
- 16 (13) the collectability of accounts receivable;
- 17 (14) financial information, valuations or projections relevant to the creditors' decision
18 to accept or reject the Chapter 11 plan;
- 19 (15) information relevant to the risks posed to creditors under the plan;
- 20 (16) the actual or projected realizable value from recovery of preferential or otherwise
21 voidable transfers;
- 22 (17) litigation likely to arise in a nonbankruptcy context;
- 23 (18) tax attributes of the debtor; and
- 24 (19) the relationship of the debtor with affiliates.

25 *In re Metrocraft Pub. Servs. Inc.*, 39 B.R. 567, 568 (Banker. N.D. Ga. 1984); *see also In re Reilly*,
26 71 B.R. 132, 134 (Banker. D. Mont. 1987).

27 The Debtor believes that the Disclosure Statement contains adequate information within
28 the meaning of Section 1125(a)(1) of the Bankruptcy Code and should be approved, because the

1 Disclosure Statement contains descriptions and summaries of, among other things:

- 2 • the Plan (see DS and Plan § VIII);
- 3 • the classes of claims and equity interests (see DS and Plan § IV.C);
- 4 • the history of the Debtor (see DS and Plan § III.A and B);
- 5 • events leading to the commencement of these Chapter 11 cases (see DS and Plan §
- 6 III.B);
- 7 • a description of the available assets and their value (see DS and Plan § VI.A and
- 8 Exhibit C);
- 9 • financial information, valuations and projections relevant to the decision by creditors
- 10 to accept or reject the Plan (see DS and Plan § Exhibits D and E);
- 11 • the estimated administrative expenses, including the estimated fees of the attorneys,
- 12 financial advisors and accountants retained by the Debtor's estate (see DS and Plan §
- 13 VIII.B.1. and Exhibit H);
- 14 • a liquidation analysis comparing recoveries under Chapter 7 and the Plan (see DS and
- 15 Plan § VII);
- 16 • a disclaimer that no statements or information concerning the Debtor is authorized
- 17 other than those in the Disclosure Statement (see DS and Plan § I);
- 18 • information regarding the future of the Debtor and future management of the Debtor
- 19 (see DS and Plan § III.C and D);
- 20 • the effect on creditors of Plan confirmation (see DS and Plan §§ VIII and X);
- 21 • Plan-related risk factors to be considered by creditors (see DS and Plan § V.E);
- 22 • tax consequences of the Plan (see DS and Plan § V.F); and

23 The Debtor submits that the Disclosure Statement therefore provides "adequate
24 information" within the meaning of Section 1125 of the Bankruptcy Code, and should be
25 approved for use in soliciting the votes of the Debtor's creditors on the Plan.

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1 **B. The Procedures and Deadlines Proposed By the Debtor for the Form, Scope, and**
2 **Nature of Solicitation, Balloting, Tabulation, and Notices.**

3 **1. Distribution and Approval of the Solicitation Package.**

4 Bankruptcy Rule 3017(d) requires that a proponent send to all creditors and interest
5 holders a notice of (a) the deadlines for balloting on the plan and for objecting to confirmation of
6 the plan, and (b) the plan and disclosure statement. Bankruptcy Rule 3017(d) further requires that
7 “a form of ballot conforming to the appropriate Official Form shall be mailed to creditors and
8 equity security holders entitled to vote on the plan.” Fed. R. Bankr. P. 3017(d); see also Fed. R.
9 Bankr. P. 3018(c) (“An acceptance or rejection shall ... conform to the appropriate Official
10 Form.”).

11 Pursuant to Bankruptcy Rule 3017(d), for purposes of soliciting votes on the Plan from
12 members in the Voting Classes, the Debtor proposes to provide solicitation packages (each, a
13 “Solicitation Package”) comprised of the following: (1) DS and Plan; (2) a notice of the
14 confirmation hearing and related matters (the “Confirmation Hearing Notice”), substantially in
15 the form annexed as **Exhibit “A”** hereto, that includes (i) the deadline for returning ballots to
16 accept or reject the Plan, (ii) the deadline for filing preliminary objections to confirmation of the
17 Plan, (iii) the deadline for filing a response to the Debtor’s motion to confirm the Plan (the
18 “Confirmation Motion”), and (iv) the date and time of the hearing regarding confirmation of the
19 Plan; (3) a ballot appropriate to each of the two Voting Classes, substantially in the forms
20 annexed hereto as **Exhibit “B”** (each, a “Ballot”); and (4) the order approving the Disclosure
21 Statement (the “Disclosure Statement Order”).

22 The Debtor proposes to provide the Solicitation Packages to the following entities:

- 23 • All known creditors (1) that have filed a proof of claim in the Debtor’s case (other
24 than claims that have been disallowed, waived, or withdrawn by order of the Court,
25 stipulation, or otherwise), or (2) that have not filed a proof of claim in the Debtor’s
26 case, but are listed on the Debtors’ Schedules of Assets and Liabilities (the
27 “Schedules”) as holding a claim which is not identified as being contingent,
28 unliquidated or disputed.

- 1 • All non-Debtor parties to unexpired leases and executory contracts as of June 15,
2 2017, (*i.e.*, the Petition Date);
- 3 • All parties who have requested special notice in the Debtor’s case (collectively, the
4 “Special Notice Parties”);
- 5 • The Office of the United States Trustee (the “U.S. Trustee”) and the governmental
6 entities enumerated in Bankruptcy Rule 2002(j); and
- 7 • All known holders of the Debtor’s equity interests existing as of the Petition Date (the
8 “Shareholders”).

9 As to members of the Unimpaired Nonvoting Classes – *i.e.*, creditors not entitled to vote
10 on the Plan – the Debtor proposes to provide only a copy of the Confirmation Hearing Notice.

11 The Confirmation Hearing Notice provides the information required by Bankruptcy Rule
12 3017(d). The proposed forms of the Ballots conform in all material respects with Official
13 Bankruptcy Form 314. Therefore, the Debtor requests that the Court approve the Solicitation
14 Package, including the forms of the Confirmation Hearing Notice and the Ballots, and the
15 proposed distribution of the Solicitation Package as described above.

16 **2. The Proposed Balloting Deadline.**

17 Bankruptcy Rule 3017(c) provides that, “[o]n or before approval of the disclosure
18 statement, the court shall fix a time within which holders of claims and interests may accept or
19 reject the plan.” Fed. R. Bankr. P. 3017(c). The Debtor requests that the Court set the deadline
20 for service of the Solicitation Packages to be **December 21, 2017**. Given the proposed mailing
21 date of the Solicitation Package, the Debtor requests that the Court set **January 11, 2018, at 5:00**
22 **p.m. prevailing Pacific Time**, as the Balloting Deadline. The Solicitation Package service date
23 and Balloting Deadline should provide creditors who are entitled to vote with sufficient time to
24 review the solicitation material and to cast ballots on the Plan.

25 **3. The Proposed Procedures for Balloting and Tabulation of Votes.**

26 Generally, only holders of allowed claims or interests are entitled to vote to accept or
27 reject a proposed plan of reorganization. *See* 11 U.S.C. § 1126(a). The Debtor proposes that the
28 following procedures for balloting and for the tabulation of the Ballots with respect to the Plan be

1 approved:

2 a. the amount of a claim for purposes of ballot tabulation will be:

3 i. for a claim identified in the Schedules as not contingent, not
4 unliquidated, and not disputed, and that has not been disallowed,
5 waived, or withdrawn by order of the Court, stipulation, or
6 otherwise prior to the Balloting Deadline, and for which no proof of
7 claim has been timely filed, the claim amount as identified in the
8 Schedules (the "Scheduled Amount");

9 ii. for a timely proof of claim that is filed in a specified liquidated
10 amount and that is not the subject of an objection filed before the
11 Balloting Deadline that has not been disallowed, waived, or
12 withdrawn by order of the Court, stipulation, or otherwise prior to
13 the Balloting Deadline, the specified liquidated amount in such
14 proof of claim (the "Liquidated Amount"); and

15 iii. for a claim that is the subject of an objection in whole or in part
16 before the Balloting Deadline, only the undisputed amount, if any,
17 of such claim, unless such claim is temporarily allowed under
18 Bankruptcy Rule 3018(a).

19 b. If an entity submits a Ballot for a claim (i) for which there is no timely
20 proof of claim filed and for which there is no corresponding Scheduled Amount, or (ii)
21 which is the subject of an unresolved objection filed prior to the Confirmation Hearing,
22 such Ballot will not be counted unless otherwise ordered by the Court.

23 c. If an entity casts more than one eligible Ballot with respect to the same
24 claim before the Balloting Deadline, the last Ballot received prior to that deadline shall
25 supersede any prior Ballot(s) by such entity with respect to such claim.

26 d. Creditors that may have claims in more than one class under the Plan must
27 submit a separate Ballot for voting their claims in each such class. Any creditor that
28 requires additional copies of a Ballot may either photocopy the original Ballot or obtain an

1 additional Ballot pursuant to the instructions set forth in the Confirmation Hearing Notice
2 and the proposed Ballot. If a creditor uses one Ballot to vote claims in more than one
3 class, such combined Ballot will not be counted.

4 e. Any Ballot that is incomplete or that is not received by the applicable
5 deadline shall not be counted; provided, however, that any Ballot that is signed but that
6 does not indicate an acceptance or rejection of the Plan shall be deemed to be a Ballot
7 accepting the Plan.

8 f. Rust Consulting/Omni Bankruptcy (“Ballot Tabulator”) shall tabulate the
9 Ballots and prepare the appropriate reports with respect thereto. After tabulation of the
10 Ballots, a Plan Ballot Summary, in substantially the form of Official Bankruptcy Form
11 314, shall be filed with the Court.

12 The Debtor has proposed the procedures set forth above to ensure that only the votes of
13 holders of allowed claims are counted in the tabulation of the Ballots on the Plan. The Debtor
14 submits that the proposed procedures are reasonable and appropriate under the circumstances and
15 should be approved.

16 **4. The Proposed Procedures and Deadlines for Briefing and the Confirmation**
17 **Hearing.**

18 Bankruptcy Rule 3017(c) provides that “[o]n or before approval of the disclosure
19 statement, the court . . . may fix a date for the hearing on confirmation.” Fed. R. Bankr. P.
20 3017(c). Similarly, Bankruptcy Rule 3020(b) provides that “[a]n objection to confirmation of the
21 plan shall be filed and served . . . within a time fixed by the court,” Fed. R. Bankr. P. 3020(b), and
22 Bankruptcy Rule 2002(b) provides that the plan proponent must provide at least twenty-eight (28)
23 days’ notice of the deadline for filing such objections.

24 The Debtor requests that the Court set the following hearing dates and/or deadlines:

25 (a) The Confirmation hearing (the “Confirmation Hearing”) shall be **February**
26 **8, 2018 at 11:00 a.m.**

27 (b) The deadline to file a Preliminary Objection (as defined in the DS and Plan
28 Order) to confirmation of the Plan shall be **January 18, 2018.**

1 (c) The deadline to file the Confirmation Motion shall be **January 18, 2018**.
2 This will also be the last date for the Debtor to file and serve any initial memoranda and evidence
3 in support of confirmation of the Plan. The memoranda and evidence must be served upon the
4 Debtor, the Office of the U.S. Trustee, bankruptcy counsel for the Official Committee of
5 Unsecured Creditors (the "Committee") and its counsel, any party that filed a Preliminary
6 Objection, and Special Notice Parties

7 (d) The deadline to file The Plan Ballot Summary shall be **January 18, 2018**.

8 (e) The last date to file and serve any objections to the Confirmation Motion
9 and evidence in opposition to confirmation of the Plan shall be **January 25, 2018**. The objection
10 and evidence must be served upon the Debtor, Debtor's bankruptcy counsel, the Committee's
11 bankruptcy counsel, and the U.S. Trustee. The objection must be in writing and accompanied by
12 a memorandum of points and authorities, and set forth in detail the name and address of the party
13 filing the objection, the grounds for the objection, any evidentiary support for the objection in the
14 nature of declarations submitted under penalty of perjury, and the amount of the objecting party's
15 claims or such other grounds that give the objecting party standing to assert the objection.

16 (f) The last date to file and serve any objections and evidence in opposition to
17 assumption or rejection of the Debtor's executory contracts and unexpired leases, including any
18 objections to the proposed cure payments specified therein, shall be **January 25, 2018**.

19 (g) Any objections not timely filed and served will be deemed to be waived
20 and to be consent to the Court's entry of an order confirming the Plan.

21 (h) Any evidence that is not timely filed and served will be stricken from the
22 record and will not be considered in determining any contested matter at the Confirmation
23 Hearing.

24 (i) All declarants must be available, without need for subpoena, to appear for
25 cross-examination at the Confirmation Hearing. The testimony of any declarant who is not
26 present for cross-examination at the Confirmation Hearing will be stricken from the record and
27 will not be considered in determining contested matters at the Confirmation Hearing.

28 (j) Responses to any objections to confirmation of the Plan may be filed and

1 served by **February 1, 2018**.

2 The Debtor submits that the proposed dates for the Confirmation Hearing, the associated
3 deadlines for objecting to the Plan and for responding to such objections, and the related
4 procedures set forth herein are appropriate and are within the scope of the Bankruptcy Code,
5 Bankruptcy Rules, the Local Rules, and the DS and Plan Order.

6 **V.**

7 **CONCLUSION**

8 For the foregoing reasons, the Debtor respectfully requests that the Court enter an order:

9 (1) granting the Motion;

10 (2) approving the Disclosure Statement, the proposed solicitation, voting and
11 tabulation procedures, form of Ballots, and manner of notice proposed by the Debtor;

12 (3) setting various confirmation-related deadlines, including the Confirmation
13 Hearing; and

14 (4) granting such other and further relief as is just and proper.

15 Dated: November 20, 2017

LEVENE, NEALE, BENDER, YOO
& BRILL L.L.P.

16

17

By: /s/ Eve H. Karasik

18

TIMOTHY J. YOO

19

EVE H. KARASIK

20

JULIET Y. OH

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Attorneys for Chapter 11 Debtor and
Debtor in Possession

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EXHIBIT “A”

[Confirmation Hearing Notice]

| | |
|---|---------------------------|
| <p>Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address TIMOTHY J. YOO (SBN 155531) EVE H. KARASIK (SBN 155356) JULIET Y. OH (SBN 211414) LEVENE, NEALE, BENDER, YOO & BRILL L.L.P. 10250 Constellation Boulevard, Suite 1700 Los Angeles, California 90067 Telephone: (310) 229-1234 Facsimile: (310) 229-1244 Email: TJY@LNBYB.com,; EHK@LNBYB.com; JYO @LNBYB.com</p> <p><input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Chapter 11 Debtor and Debtor in Possession</p> | <p>FOR COURT USE ONLY</p> |
|---|---------------------------|

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION**

| | |
|---|--|
| <p>In re: CORNERSTONE APPAREL, INC., d/b/a Papaya Clothing,</p> <p align="center">Debtor.</p> <p align="right">Debtor(s).</p> | <p>CASE NO.: 2:17-bk-17292-VZ CHAPTER: 11</p> <p align="center">NOTICE OF DATES RELATED TO CONFIRMATION OF PLAN, AND DEADLINES TO (A) SUBMIT BALLOTS; (B) FILE PRELIMINARY OBJECTION TO PLAN CONFIRMATION; AND (C) FILE RESPONSE TO MOTION TO CONFIRM PLAN</p> <p align="center">[11 U.S.C. § 1128; FRBP 3018, 3020(b); LBR 3018-1]</p> <p>Hearing on Motion to Confirm Plan of Reorganization DATE: February 8, 2018 TIME: 11:00 a.m. COURTROOM: 1368, Roybal Federal Building ADDRESS: 255 E. Temple Street, Los Angeles, CA 90012</p> |
|---|--|

- Plan of Reorganization. A “Disclosure Statement and Plan of Reorganization” (the “**DS and Plan**”) is being served with this Notice. The DS and Plan is combined in one document to avoid confusion and contradiction. The terms of the Plan of Reorganization (the “**Plan**”) are in **sections VIII – X of the DS and Plan**, including proposed treatment of each claim. **The terms become binding if the court enters an order confirming the Plan.**
- Proponent of Plan of Reorganization: The party who filed the DS and Plan (“Proponent”) is: Debtor, or .
- Court-Approved Disclosure Statement. 11 U.S.C. § 1125 requires adequate information to be disclosed with the Plan, to help claimants decide whether to submit a ballot to accept or reject the proposed treatment of their claim in the Plan, and/or to file a preliminary objection to confirmation of the Plan. Sections I – VII and XI of the DS and Plan constitute the disclosure statement. **The court approved the adequacy of the Disclosure Statement at a hearing held on (date) December 14, 2017.**
- Hearing on Confirmation of Plan. This hearing is required by 11 U.S.C. § 1128 and FRBP 3020(b), and is set on at least 42 days of notice to the U.S. trustee, the debtor, and to all claimants and parties in interest

This form has been approved for use in chapter 11 cases assigned to Judge Vincent P. Zurzolo.

5. Motion to Confirm Plan. Pursuant to FRBP 9014 and LBR 9013-1(d), no later than 21 days before the hearing the Debtor will file a motion to confirm the Plan ("Motion to Confirm Plan"). The Proponent of the Plan will serve the Motion to Confirm Plan on the U.S. trustee, the debtor, and all parties who vote against the Plan or file a preliminary objection to the Plan. At the hearing the court will determine if the Plan complies with the requirements of 11 U.S.C. §§ 1121-1129.
6. Notice of Additional Injunction. Pursuant to FRBP 2002(c)(3), if the Plan provides for an injunction against conduct not otherwise enjoined under the Bankruptcy Code, this notice must (a) include a statement in conspicuous language that the plan proposes an injunction; (b) describe briefly the nature of the injunction; and (c) identify the entities that would be subject to the injunction. That information is contained in Exhibit A.
7. Dates and Deadlines.
- a. **Submitting a Ballot to Vote on Plan Treatment**. FRBP 3018 and LBR 3018-1 require the Proponent to file a summary of ballots received from claimants and interest holders who voted to accept or reject the proposed treatment of their claim(s).
1. Ballot. A ballot accompanies this Notice.
 2. Who Has the Right to Submit a Ballot to Vote. As set forth in **section IV.C of the DS and Plan**, claimants and interest-holders with an impaired claim or interest have the right to submit a ballot to indicate their vote on whether to accept or reject their treatment under the Plan. Claimants who hold an impaired claim, but do not submit a ballot, are deemed to have accepted the proposed treatment of their claim. To determine if your claim is impaired, please see **section VIII of the DS and Plan** to locate the proposed treatment of your claim.
 3. Submitting a Ballot. If your claim is impaired, please submit a completed ballot so that it is **RECEIVED** no later than the following deadline at the following address:
 - A. **DEADLINE:** (date) January 11, 2018 at 5:00 p.m. Prevailing Pacific Time
 - B. **ADDRESS TO MAIL BALLOT:** Rust Consulting/Omni Bankruptcy, Attn: Cornerstone Apparel, Inc. Balloting, 5955 De Soto Ave., Suite 100, Woodland Hills, CA 91367
- b. **Filing a Preliminary Objection to Confirmation of the Plan**
1. Preliminary Objection. A preliminary objection to confirmation ("Preliminary Objection") is filed before the Proponent of the Plan files a Motion to Confirm Plan. This provides the Proponent the opportunity to resolve objections before filing a Motion to Confirm Plan or, if necessary, to file an amended DS and Plan.
 2. Who May File a Preliminary Objection. All parties in interest may file a Preliminary Objection. With the exception of the U.S. trustee and the debtor, the Motion to Confirm will not be served on you if you do not vote against the Plan or file a Preliminary Objection.
 3. Filing and Serving a Preliminary Objection: Pursuant to FRBP 2002(b) this notice provides at least 28 days of notice of the deadline to file an objection to the Plan. Serve a Preliminary Objection at the address(es) identified below; then, file the Preliminary Objection with the court by the following deadline:

DEADLINE: January 18, 2018

DEBTOR'S ADDRESS: Cornerstone Apparel, Inc., 5807 Smithway Street, Los Angeles, CA 90040

DEBTOR'S ATTORNEY'S ADDRESS: Levene, Neale, Bender Yoo & Brill L.L.P., 10250 Constellation Blvd., Suite 1700, Los Angeles, CA 90067.

Do not mail the response. The Debtor's attorney will be served by Notice of Electronic Filing; **or**

Mailing Address:

PROPONENT'S ATTORNEY'S ADDRESS: N/A

Do not mail the response. The Proponent's attorney will be served by Notice of Electronic Filing; **or**

Mailing Address:

c. Filing a Response to Motion to Confirm Plan. FRBP 3020(b); LBR 9013-1(f)

1. Response to Motion: A response to a Motion to Confirm Plan (“Response to Motion to Confirm Plan”) is a way to object to the Plan after the Proponent files a Motion to Confirm. If you filed a Preliminary Objection, the Proponent will serve you with a copy of the Motion to Confirm Plan, which may contain additional information and declarations to determine whether to file a response. If you did not file a Preliminary Objection, you may consult the court’s docket for this case 21 days before the hearing to review the Motion to Confirm Plan.
2. Who May File a Response: All parties in interest may file a Response to the Motion to Confirm Plan.
3. Filing and Serving a Response: Serve a Response to Motion to Confirm Plan at the addresses identified below; then, file the Response to Motion to Confirm Plan with the court by the following deadline:

DEADLINE: January 25, 2018

ADDRESS OF DEBTOR AND DEBTOR’S ATTORNEY: See above, section 6.b.3.

ADDRESS OF PROPONENT AND PROPONENT’S ATTORNEY: See above, section 6.b.3.

Date: December , 2018

Signature of debtor/proponent

Tae Y. Yi

Printed name of debtor/proponent

Date: December , 2018

Signature of attorney for debtor/proponent, if any

Eve H. Karasik

Printed name of attorney for debtor/proponent, if any

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EXHIBIT “B”

[Ballots]

Timothy J. Yoo (State Bar No. 155531
tjy@lnbyb.com
Eve H. Karasik (State Bar No. 155356)
ehk@lnbyb.com
Juliet Y. Oh (State Bar No. 211414)
jyo@lnbyb.com
LEVENE, NEALE, BENDER, YOO &
BRILL LLP
10250 Constellation Boulevard, Suite 1700
Los Angeles, California 90067
Telephone: (310) 229-1234
Facsimile: (310) 229-1244

Attorneys for the Chapter 11 Debtor and
Debtor in Possession

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re:

CORNERSTONE APPAREL, INC.,
d/b/a Papaya Clothing,

Debtor.

Case No. 2:17-bk-17292-VZ

Chapter 11

**CLASS 2 BALLOT FOR ACCEPTING OR
REJECTING THE PLAN OF
REORGANIZATION OF DEBTOR WHO IS
NOT AN INDIVIDUAL**

[GENERAL UNSECURED CLAIMS]

Cornerstone Apparel, Inc., the debtor and debtor-in-possession (the “Debtor”), filed its Plan of Reorganization (the “Plan”) in this chapter 11 case. The Court has approved a disclosure statement with respect to the Plan (the “Disclosure Statement”). The Disclosure Statement provides information to assist you in deciding how to vote your ballot. If you do not have a Disclosure Statement, you may obtain a copy from:

Counsel to the Debtor:

Levene, Neale, Bender, Yoo & Brill L.L.P.
10250 Constellation Blvd., Suite 1700
Los Angeles, CA 90067
Telephone: (310) 229-1234
Attn: Eve H. Karasik, Esq.

Court approval of the Disclosure Statement does not indicate approval of the Plan by the Court.

You should review the Disclosure Statement and the Plan before you vote. You may wish to seek legal advice concerning the Plan and your classification and treatment under the Plan. Your claim has been placed in Class 2 as a general unsecured claim under the Plan. If you hold claims in more than one class, you will receive a ballot for each class in which you may be entitled to vote. The fact that you have received a ballot is not an admission by the Debtor that you are entitled to vote.

If your ballot is not received by the Debtor's balloting agent, Rust Consulting/Omni Bankruptcy, Attn: Cornerstone Apparel, Inc. Balloting, 5955 De Soto Ave., Suite 100, Woodland Hills, CA 91367, on or before **January 11, 2018, at 5:00 p.m. prevailing Pacific Time (the "Voting Deadline")**, and such deadline is not extended, your vote will not count as either an acceptance or rejection of the Plan. For a vote to be counted, you must (a) complete all the required information on this ballot, and (b) sign, date and return the completed ballot by first class mail, messenger, or overnight courier so that it is actually received no later than the Voting Deadline.

If the Plan is confirmed by the Bankruptcy Court, it will be binding on you whether or not you vote.

ACCEPTANCE OR REJECTION OF THE PLAN

The undersigned, the holder of a Class 2 claim against the Debtor in the unpaid amount of _____ Dollars (\$_____)

(Check one box only)

ACCEPTS THE PLAN

REJECTS THE PLAN

Dated: _____, 2018

Print or type name: _____

Signature: _____

Title (if corporation or partnership): _____

Address: _____

RETURN THIS BALLOT TO:

Rust Consulting/Omni Bankruptcy
Attn: Cornerstone Apparel, Inc. Balloting
5955 De Soto Ave., Suite 100
Woodland Hills, CA 91367

Timothy J. Yoo (State Bar No. 155531
tjy@lnbyb.com
Eve H. Karasik (State Bar No. 155356)
ehk@lnbyb.com
Juliet Y. Oh (State Bar No. 211414)
jyo@lnbyb.com
LEVENE, NEALE, BENDER, YOO &
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10250 Constellation Boulevard, Suite 1700
Los Angeles, California 90067
Telephone: (310) 229-1234
Facsimile: (310) 229-1244

Attorneys for the Chapter 11 Debtor and
Debtor in Possession

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re:

CORNERSTONE APPAREL, INC.,
d/b/a Papaya Clothing,

Debtor.

Case No. 2:17-bk-17292-VZ

Chapter 11

**CLASS 4a BALLOT FOR ACCEPTING OR
REJECTING THE PLAN OF
REORGANIZATION OF DEBTOR WHO IS
NOT AN INDIVIDUAL**

**[HYUNDAI MOTOR FINANCE SECURED
CLAIM]**

Cornerstone Apparel, Inc., the debtor and debtor-in-possession (the “Debtor”), filed its Plan of Reorganization (the “Plan”) in this chapter 11 case. The Court has approved a disclosure statement with respect to the Plan (the “Disclosure Statement”). The Disclosure Statement provides information to assist you in deciding how to vote your ballot. If you do not have a Disclosure Statement, you may obtain a copy from:

Counsel to the Debtor:

Levene, Neale, Bender, Yoo & Brill L.L.P.
10250 Constellation Blvd., Suite 1700
Los Angeles, CA 90067
Telephone: (310) 229-1234
Attn: Eve H. Karasik, Esq.

Court approval of the Disclosure Statement does not indicate approval of the Plan by the Court.

You should review the Disclosure Statement and the Plan before you vote. You may wish to seek legal advice concerning the Plan and your classification and treatment under the Plan. Your claim has been placed in Class 4a as a secured claim under the Plan. If you hold claims in more than one class, you will receive a ballot for each class in which you may be entitled to vote. The fact that you have received a ballot is not an admission by the Debtor that you are entitled to vote.

If your ballot is not received by the Debtor's balloting agent, Rust Consulting/Omni Bankruptcy, Attn: Cornerstone Apparel, Inc. Balloting, 5955 De Soto Ave., Suite 100, Woodland Hills, CA 91367, on or before **January 11, 2018, at 5:00 p.m. prevailing Pacific Time (the "Voting Deadline")**, and such deadline is not extended, your vote will not count as either an acceptance or rejection of the Plan. For a vote to be counted, you must (a) complete all the required information on this ballot, and (b) sign, date and return the completed ballot by first class mail, messenger, or overnight courier so that it is actually received no later than the Voting Deadline.

If the Plan is confirmed by the Bankruptcy Court, it will be binding on you whether or not you vote.

ACCEPTANCE OR REJECTION OF THE PLAN

The undersigned, the holder of a Class 4a claim against the Debtor in the unpaid amount of _____ Dollars (\$_____)

(Check one box only)

ACCEPTS THE PLAN

REJECTS THE PLAN

Dated: _____, 2018

Print or type name: _____

Signature: _____

Title (if corporation or partnership): _____

Address: _____

RETURN THIS BALLOT TO:

Rust Consulting/Omni Bankruptcy
Attn: Cornerstone Apparel, Inc. Balloting
5955 De Soto Ave., Suite 100
Woodland Hills, CA 91367

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 10250 Constellation Boulevard, Suite 1700, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled: **NOTICE OF MOTION AND MOTION TO APPROVE ADEQUACY OF DISCLOSURE STATEMENT OF DEBTOR WHO IS NOT AN INDIVIDUAL** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **November 20, 2017**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On **November 20, 2017**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Debtor

Cornerstone Apparel, Inc.
5807 Smithway Street
Los Angeles, CA 90040

United States Trustee
Kelly L. Morrison
915 Wilshire Blvd., Suite 1850
Los Angeles, California 90017

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **November 20, 2017**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Served via Attorney Service

Hon. Vincent P. Zurzolo
United States Bankruptcy Court
Edward R. Roybal Federal Building
255 E. Temple Street, Suite 1360 / Ctrm 1368
Los Angeles, CA 90012

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

| | | |
|-------------------|--------------------|------------------------|
| November 20, 2017 | Stephanie Reichert | /s/ Stephanie Reichert |
| <i>Date</i> | <i>Type Name</i> | <i>Signature</i> |

1 **1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

2 Dustin P Branch on behalf of Creditor PGIM Real Estate, Starwood Retail Partners, LLC, The Macerich
3 Company, Westfield, LLC
4 branchd@ballardspahr.com, carolod@ballardspahr.com;hubenb@ballardspahr.com

4 John H Choi on behalf of Interested Party Courtesy NEF
5 johnchoi@kpcylaw.com, christinewong@kpcylaw.com

6 Richard T Davis on behalf of Creditor Spotsylvania Mall Company
7 rdavis@cafarocompany.com, lspahlinger@cafarocompany.com

7 John P Dillman on behalf of Creditor Cypress-Fairbanks ISD, Galveston County, Harris County, Tyler
8 County: houston_bankruptcy@publicans.com

9 Scott Ewing on behalf of Interested Party Courtesy NEF
10 contact@omnimgt.com, sewing@omnimgt.com;ecf@omnimgt.com;docketalarm-ecf-cacb-
11 5715976304852992@inbound.docketalarm.com

11 Matthew A Gold on behalf of Creditor Argo Partners
12 courts@argopartners.net

12 Ronald E Gold on behalf of Creditor Washington Prime Group Inc.
13 rgold@fbtlaw.com, joguinn@fbtlaw.com

14 Courtney J Hull on behalf of Creditor Texas Comptroller of Public Accounts
15 bk-chull@oag.texas.gov, sherri.simpson@oag.texas.gov

15 Clifford P Jung on behalf of Interested Party Courtesy NEF
16 clifford@jyllp.com, victoria@jyllp.com;karill@jyllp.com

17 Eve H Karasik on behalf of Debtor Cornerstone Apparel, Inc.
18 ehk@lnbyb.com

18 John W Kim on behalf of Attorney John W Kim
19 johnkim@jwkllawgroup.com

20 Jeffrey Kurtzman on behalf of Creditor PREIT Services, as agent for PR Springfield Town Center, LLC
21 kurtzman@kurtzmansteady.com

21 Jeffrey S Kwong on behalf of Debtor Cornerstone Apparel, Inc.
22 jsk@lnbyb.com, jsk@ecf.inforuptcy.com

23 Dare Law on behalf of U.S. Trustee United States Trustee (LA): dare.law@usdoj.gov

24 Scott Lee on behalf of Creditor Committee Official Committee of Unsecured Creditors
25 slee@lbbslaw.com

25 Noreen A Madoyan on behalf of Interested Party Courtesy NEF
26 Noreen@MarguliesFaithLaw.com,
27 Helen@MarguliesFaithlaw.com;Victoria@MarguliesFaithlaw.com;Brian@MarguliesFaithlaw.com

27 Thor D McLaughlin on behalf of Creditor Taubman Landlords
28 tmclaughlin@allenmatkins.com, igold@allenmatkins.com

- 1 Monserrat Morales on behalf of Interested Party Courtesy NEF
mmorales@marguliesfaithlaw.com,
Helen@marguliesfaithlaw.com;Victoria@marguliesfaithlaw.com;Brian@marguliesfaithlaw.com
- 2 Kevin M Newman on behalf of Creditors Carousel Center Company, L.P., EklecCo NewCo LLC, and
3 Pyramid Walden Company, L.P.
knewman@menterlaw.com, kmnbk@menterlaw.com
- 4 Juliet Y Oh on behalf of Debtor Cornerstone Apparel, Inc.
5 jyo@lnbrb.com, jyo@lnbrb.com
- 6 Kristen N Pate on behalf of Creditor GGP Limited Partnership
ggpbk@ggp.com
- 7 Christopher E Prince on behalf of Interested Party Courtesy NEF
8 cprince@lesnickprince.com,
jmack@lesnickprince.com;mlampton@lesnickprince.com;cprince@ecf.courtdrive.com
- 9 Lovee D Sarenas on behalf of Creditor Committee Official Committee of Unsecured Creditors
10 lovee.sarenas@lewisbrisbois.com
- 11 Benjamin Seigel on behalf of Interested Party Courtesy NEF
bseigel@greenbass.com, rholland@greenbass.com;ecfnotification@greenbass.com
- 12 Michael A Shakouri on behalf of Creditor c/o Goodkin & Lynch 5060 Montclair Plaza Lane Owner, LLC
13 mshakouri@goodkinlynch.com, paralegal@goodkinlynch.com
- 14 Ronald M Tucker, Esq on behalf of Creditor Simon Property Group, Inc.
rtucker@simon.com, cmartin@simon.com;psummers@simon.com;Bankruptcy@simon.com
- 15 United States Trustee (LA)
16 ustpreion16.la.ecf@usdoj.gov
- 17 Ashley R Wedding on behalf of Creditor Temecula Towne Center Associates L.P.
awedding@fabozzimillerlaw.com, dsandoval@fabozzimillerlaw.com
- 18 Elizabeth Weller on behalf of Creditor Dallas County, Smith County, and Tarrant County
19 dallas.bankruptcy@publicans.com
- 20 Eric R Wilson on behalf of Creditor Committee Official Committee of Unsecured Creditors
kdwbankruptcydepartment@kelleydrye.com, MVicinanza@ecf.inforuptcy.com
- 21 Timothy J Yoo on behalf of Debtor Cornerstone Apparel, Inc.
22 tjy@lnbyb.com
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