

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

In re:)	Chapter 11
)	
MONTESQUIEU, INC., <u>et al.</u> , ¹)	Case No. 19-10599 (BLS)
)	
Debtors.)	Jointly Administered
)	
)	Hearing Date: April 23, 2019 at 11:00 a.m. ET
)	Objections Due: April 16, 2019 at 4:00 p.m. ET
)	
)	Re: D.I. 6, 7, 9, 12, 14, 19, 25, 26, 28, 30, 31,
)	32, and 34

OMNIBUS NOTICE OF FINAL HEARING ON FIRST DAY MOTIONS

PLEASE TAKE NOTICE that Montesquieu, Inc. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”) have filed the following motions and related pleadings (collectively, the “First Day Motions”):

1. Debtors’ Motion for Order Under Sections 105 and 363 of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 6003 (A) Authorizing the Debtors to Maintain and Renew Existing Insurance Policies and (B) Authorizing Financial Institutions to Honor All Obligations Related Thereto, filed on March 20, 2019 [Docket No. 6];

2. Debtors’ Motion Pursuant to Sections 105(a), 507(a)(8) and 541(d) of the Bankruptcy Code for Interim and Final Orders Authorizing Payment of Prepetition Sales, Use and Franchise Taxes and Similar Taxes and Fees, filed on March 20, 2019 [Docket No. 7];

3. Motion of Debtors for an Interim and Final Order Pursuant to 11 U.S.C. §§105(a) and 363 Authorizing Debtors to Pay Prepetition Claims of Shippers and Customs Representatives and Granting Related Relief, filed on March 20, 2019 [Docket No. 9];

4. Motion of Debtors for Entry of Order (A) Authorizing Debtors to Pay Prepetition Claims of Critical Vendors and (B) Granting Related Relief, filed on March 21, 2019 [Docket No. 12];

¹ The Debtors and the last four digits of their respective taxpayer identification numbers include: Montesquieu, Inc. (8069), WG Best Weinkellerie, Inc. dba Montesquieu Winery (California) (0458) and Montesquieu Corp. (California) (4025). The headquarters and service address for the above-captioned Debtors is 8929 Aero Dr., San Diego, California 92123.

5. Motion of the Debtors Pursuant to 11 U.S.C. §§105(a), 363, and 507(a) for an Order (A) Authorizing the Debtors to (I) Pay Wages, Salaries, and Other Compensation, (II) Maintain Benefits, and (III) Pay Reimbursable Employee Expenses and (B) Authorizing and Directing Banks and Other Financial Institutions to Pay All Checks and Electronic Payment Requests Made by the Debtors Relating to the Foregoing, filed on March 21, 2019 [Docket No. 13]

6. Motion of Debtors for Interim and Final Orders Authorizing (A) Continued Use of Cash Management System; (B) Maintenance of Existing Bank Accounts; (C) Continued Use of Existing Business Forms; and (D) Continued Performance of Intercompany Transactions in the Ordinary Course of Business and Grant of Administrative Expense Status for Postpetition Intercompany Claims, filed on March 21, 2019 [Docket No. 14]; and

7. Motion Prohibiting Utilities from Discontinuing Service Motion of Debtors' for Interim and Final Orders (A) Approving the Debtors' Proposed Adequate Assurance of Payment for Further Utility Services, (B) Prohibiting Utilities Providers from Altering, Refusing, or Discontinuing Services, (C) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests and (D) Granting Related Relief, filed on March 21, 2019 [Docket No. 19].

PLEASE TAKE FURTHER NOTICE that on March 22, 2019 the Court conducted a hearing on the First Day Motions, and entered the following interim orders (collectively, the "Interim Orders"):

1. Interim Order (A) Authorizing the Debtors to Maintain and Renew Existing Insurance Policies and (B) Authorizing Financial Institutions to Honor All Obligations Related Thereto [Docket No. 25];

2. Interim Order Authorizing Payment of Prepetition Sales, Use and Franchise Taxes and Similar Taxes and Fees [Docket No. 26];

3. Interim Order Pursuant to 11 U.S.C. §§105(a) and 363 Authorizing Debtors to Pay Prepetition Claims of Shippers and Customs Representatives and Granting Related Relief [Docket No. 28];

4. Interim Order (A) Authorizing Debtors to Pay Prepetition Claims of Critical Vendors and (B) Granting Related Relief [Docket No. 30];

5. Interim Order (A) Authorizing the Debtors to (I) Pay Wages, Salaries, and Other Compensation, (II) Maintain Benefits, and (III) Pay Reimbursable Employee Expenses and (B) Authorizing and Directing Banks and Other Financial Institutions to Pay All Checks and Electronic Payment Requests Made by the Debtors Relating to the Foregoing [Docket No. 31]

6. Interim Order Authorizing (A) Continued Use of Cash Management System; (B) Maintenance of Existing Bank Accounts; (C) Continued Use of Existing Business Forms; and (D) Continued Performance of Intercompany Transactions in the Ordinary Course of Business and Grant of Administrative Expense Status for Postpetition Intercompany Claims [Docket No. 32]; and

7. Interim Order (A) Approving the Debtors' Proposed Adequate Assurance of Payment for Further Utility Services, (B) Prohibiting Utilities Providers from Altering, Refusing, or Discontinuing Services, (C) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests and (D) Granting Related Relief [Docket No. 34].

PLEASE TAKE FURTHER NOTICE that responses or objections to entry of a final order granting any of the First Day Motions, if any, must be made in writing, filed by no later than **April 16, 2019 at 4:00 p.m. (Prevailing Eastern Time)** with the Bankruptcy Court, 824 N. Market St., 3rd Floor, Wilmington, DE 19801, and served on the following parties: (i) Proposed Counsel to the Debtors: Fox Rothschild, LLP, 919 N. Market St., Suite 300, Wilmington, DE 19801, Attn: Mette Kurth, and Thomas M. Horan; (ii) the Office of the United States Trustee, 844 King St., Room 2207, Lockbox 35, Wilmington, DE 19801, Attn: Linda Richenderfer; and (iii) counsel, if any, to the Official Committee of Unsecured Creditors.

PLEASE TAKE FURTHER NOTICE that a hearing to consider the relief requested in the First Day Pleadings (the "First Day Hearing")² has been scheduled for **April 23, 2019 at 11:00 a.m. (prevailing Eastern Time)** before the Honorable Brendan Linehan Shannon, United States Bankruptcy Judge, at the United States Bankruptcy Court for the District of Delaware, 824 North Market St., 6th Floor, Courtroom No. 1, Wilmington, DE 19801.

PLEASE TAKE FURTHER NOTICE that copies of the First Day Motions and Interim Orders can be viewed on the Court's website at <https://ecf.deb.uscourts.gov> and on the website of the Debtors' proposed notice and claims agent, Stretto, at <http://cases.stretto.com/WGBest>. Further information may be obtained by emailing TeamWGBest@stretto.com.

PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS TO ENTRY OF A FINAL ORDER ARE TIMELY FILED AND RECEIVED IN ACCORDANCE WITH THE ABOVE PROCEDURES, THE FINAL ORDER MAY BE ENTERED GRANTING THE RELIEF REQUESTED IN THE FIRST DAY MOTIONS ON A FINAL BASIS WITHOUT FURTHER NOTICE OR A HEARING.

² Parties who are unable to attend the hearing in person may participate by telephone by contacting CourtCall, an independent conference call company, at (866) 582-6878. Please refer to the Court's website at www.deb.uscourts.gov (in the "General Information" under the "Judges' Info" section) for complete information and instructions.

Dated: March 25, 2019

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/s/ Thomas M. Horan

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