

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

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In re:	)	Chapter 11
	)	
Z GALLERIE, LLC, <i>et al.</i> , <sup>1</sup>	)	Case No. 19-10488 (LSS)
	)	
Debtors.	)	(Joint Administration Requested)
	)	

**NOTICE OF HEARING ON FIRST DAY MOTIONS**

**PLEASE TAKE NOTICE** that on March 11, 2019 (the “Petition Date”), the following companies (collectively, the “Debtors”) each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the District of Delaware (the “Court”).

1. Z Gallerie, LLC
2. Z Gallerie Holding Company, LLC

**PLEASE TAKE FURTHER NOTICE** that together with their chapter 11 petitions, on the Petition Date, the Debtors have filed the following first day motions and related pleadings (collectively, the “First Day Pleadings”):

1. **First Day Declaration.** *Declaration of Mark Weinsten, Interim President and Chief Executive Officer of Z Gallerie, LLC, in Support of Debtors’ Chapter 11 Petitions and First Day Motions* [Docket No. 25]
2. **Joint Administration Motion.** *Debtors’ Motion Seeking Entry of an Order (I) Directing Joint Administration of Their Related Chapter 11 Cases and (II) Granting Related Relief* [Docket No. 3]
3. **SOFA/Schedules Extension Motion.** *Debtors’ Motion Seeking Entry of an Order (I) Extending Time to File Schedules of Assets and Liabilities, Schedules of Current*

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Z Gallerie, LLC (3816) and Z Gallerie Holding Company, LLC (5949). The location of the Debtors’ service address is: 1855 West 139th Street, Gardena, CA 90249.

*Income and Expenditures, Schedules of Executory Contracts and Unexpired Leases, and Statements of Financial Affairs and (II) Granting Related Relief [Docket No. 5]*

4. **Stretto 156(c) Retention Application.** *Debtors' Application for Appointment of Stretto as Claims and Noticing Agent [Docket No. 6]*
5. **Creditor Matrix Motion.** *Debtors' Motion Seeking Entry of an Order (I) Authorizing the Debtors to File a Consolidated List of Creditors in Lieu of Submitting a Separate Mailing Matrix for Each Debtor, (II) Authorizing the Debtors to Redact Certain Personal Identification Information for Individual Creditors, and (III) Granting Related Relief [Docket No. 4]*
6. **Cash Management Motion.** *Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, and (C) Maintain Existing Business Forms, and (II) Granting Related Relief [Docket No. 7]*
7. **Utilities Motion.** *Debtors' Motion Seeking 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 Utility Services, (III) Establishing Procedures for Determining Adequate Assurance of Payment, (IV) Authorizing Fee Payments to Engie for Services Performed, (V) Requiring Utility Providers to Return Deposits for Utility Services No Longer in Use, and (VI) Granting Related Relief [Docket No. 9]*
8. **Taxes Motion.** *Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Payment of Certain Prepetition Taxes and Fees and (II) Granting Related Relief [Docket No. 10]*
9. **Insurance Motion.** *Debtors' Motion Seeking Entry of an Order (I) Authorizing the Debtors to (A) Pay Their Obligations Under Insurance Policies Entered into Prepetition, (B) Continue to Pay Brokerage Fees, and (C) Renew, Supplement, Modify, or Purchase Insurance Coverage, and (II) Granting Related Relief [Docket No. 12]*
10. **Comprehensive Vendors Motion.** *Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing (A) Debtors to Pay Certain Prepetition Claims of Trade Claimants and Other Vendors, and (B) Procedures Related Thereto, (II) Granting Administrative Priority for Outstanding Orders, and (III) Granting Related Relief [Docket No. 11]*
11. **Customer Programs Motion.** *Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to Maintain and Administer Their Existing Customer Programs and Honor Certain Prepetition Obligations Related Thereto and (II) Granting Related Relief [Docket No. 8]*

12. **Wages Motion.** *Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing, but Not Directing, the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, Reimbursable Employee Expenses, and Non-Insider Employee Incentive Programs, and (B) Continue Employee Benefits Programs and (II) Granting Related Relief* [Docket No. 14]
13. **Store Closing Motion.** *Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing Debtors to Reject Certain Unexpired Leases of Nonresidential Real Property, (II) Approving Procedures for Store Closing Sales, (III) Authorizing Customary Bonuses to Employees of Closing Stores, and (IV) Granting Related Relief* [Docket No. 13]
14. **DIP Financing Motion.** *Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition Lenders, (V) Modifying Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief* [Docket No. 26]

**PLEASE TAKE FURTHER NOTICE** that a hearing to consider the relief requested in the First Day Pleadings (the "First Day Hearing")<sup>2</sup> has been scheduled by the Court for **March 12, 2019, at 3:30 p.m. (prevailing Eastern Time)**, with such hearing to be held before the Honorable Laurie Selber Silverstein, United States Bankruptcy Judge, United States Bankruptcy Court for the District of Delaware, at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 6<sup>th</sup> Floor, Courtroom No. 2, Wilmington, Delaware. The Debtors have requested that the Court consider the relief requested in the First Day Pleadings, in certain cases, on an interim basis pending a final hearing to be scheduled at a later date.

**PLEASE TAKE FURTHER NOTICE** that copies of the First Day Pleadings 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/zgallerie>. Further

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<sup>2</sup> 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).

information may be obtained by calling (855) 276-9008 or emailing TeamZGallerie@stretto.com.

**PLEASE TAKE FURTHER NOTICE** that if you do not want the Court to grant the relief requested in the First Day Pleadings, or if you want the Court to consider your views on the First Day Pleadings, then you or your attorney must attend the First Day Hearing. If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the First Day Pleadings and may enter orders granting the relief requested in the First Day Pleadings.

Dated: March 11, 2019  
Wilmington, Delaware

*/s/ Domenic E. Pacitti*

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