

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

In re

CR Liquidating, Inc., *et al.*,¹

Debtors.

Chapter 11

Case No.: 15-12415 (CSS)
(Jointly Administered)

RE: DOCKET NO. 1063

**NOTICE OF DEADLINE FOR FILING CERTAIN
ADMINISTRATIVE CLAIMS AGAINST CR LIQUIDATING, INC.
(F/K/A CHARLOTTE RUSSE, INC.) AND AFFILIATED DEBTORS**

PLEASE TAKE NOTICE THAT on February 3, 2019 (the “Petition Date”), CR Liquidating, Inc. (f/k/a Charlotte Russe Holding, Inc.) and its affiliated the debtors and debtors in possession (collectively, the “Debtors”), filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. § 101 *et seq.* (the “Bankruptcy Code”).

PLEASE TAKE NOTICE FURTHER THAT on November 1, 2019, the United States Bankruptcy Court for the District of Delaware (the “Court”) entered an order (the “Administrative Claims Bar Date Order”)² in the Debtors’ chapter 11 cases establishing **December 2, 2019 at 4:00 p.m. (Eastern Time)** (the “Administrative Claims Bar Date”) as the deadline for filing all administrative claims against the Debtors pursuant to sections 503(b)(1) through (8) and 507(a)(2) of the Bankruptcy Code **that arose after the Petition Date and**

¹ The Debtors and the last four digits of their respective federal taxpayer identification numbers are as follows: CR Holding Liquidating Inc. (f/k/a Charlotte Russe Holding Inc.) (4325); CR Holdings Liquidating Corporation (f/k/a Charlotte Russe Holdings Corporation) (1045); CR Intermediate Liquidating Corporation (f/k/a Charlotte Russe Intermediate Corporation) (6345); CR Enterprise Liquidating, Inc. (f/k/a Charlotte Russe Enterprise, Inc.) (2527); CR Liquidating, Inc. (f/k/a Charlotte Russe, Inc.) (0505); CR Merchandising Liquidating, Inc. (f/k/a Charlotte Russe Merchandising, Inc.) (9453); and CR Administration Liquidating, Inc. (f/k/a Charlotte Russe Administration, Inc.) (9456). The Debtors’ mailing address is 3111 Camino Del Rio N. Suite 400, San Diego, CA 92108.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Administrative Claims Bar Date Order.

through and including November 1, 2019 (the “Covered Administrative Claims”) and which are not claims of the type identified in the list below (the “Excluded Claims”):

- i. Claims incurred after November 1, 2019;
- ii. Claims under section 503(b)(9) of the Bankruptcy Code;
- iii. Claims of professionals retained pursuant to sections 327, 328 and 1103 of the Bankruptcy Code, who may seek fees and expenses for their services;
- iv. United States Trustee fees payable and unpaid under 28 U.S.C. § 1930;
- v. Administrative claims that have been allowed by order of the Court;
- vi. Administrative claims that have been paid in full pursuant to the Bankruptcy Code or in accordance with an order of the Court;
- vii. Administrative claims held by a person or entity that has filed a motion requesting allowance of such administrative expense claim prior to the Administrative Claim Bar Date; and
- viii. Any claim by a current employee for wages or benefits accruing after the Petition Date which the Debtors are authorized to pay in the ordinary course of business

YOU SHOULD NOT FILE A REQUEST FOR PAYMENT OF AN ADMINISTRATIVE CLAIM IF YOU DO NOT HOLD A COVERED ADMINISTRATIVE CLAIM. THE FACT THAT YOU RECEIVED THIS NOTICE DOES NOT NECESSARILY MEAN THAT YOU HOLD A COVERED ADMINISTRATIVE CLAIM OR THAT EITHER THE DEBTORS OR THE COURT BELIEVE THAT YOU HOLD A COVERED ADMINISTRATIVE CLAIM.

PLEASE TAKE FURTHER NOTICE that pursuant to the terms of the Administrative Claims Bar Date Order, and except as otherwise provided herein, each person or entity (including, without limitation, each individual, partnership, joint venture, limited liability company, corporation, estate, trust or governmental unit) that holds or asserts a Covered Administrative Claim must:

- a) File a Request for Payment with the Court, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801 on or before 4:00 p.m. (ET) on the Administrative Claims Bar Date; and

- b) Must serve a copy of the Request for Payment upon counsel to the Debtors (listed below) so as to be actually received on or before the Administrative Claims Bar Date:

Bayard, P.A.

Attn: Daniel N. Brogan
600 N. King Street, Suite 400
Wilmington, Delaware 19801
Email: dbrogan@bayardlaw.com

- and -

Cooley LLP

Attn: Summer M. McKee
55 Hudson Yards
New York, New York 10001
Email: smckee@cooley.com

- c) Requests for Payment will be deemed filed only when actually received by the Clerk of the United States Bankruptcy Court.
- d) Requests for Payment must conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the District of Delaware, must include supporting documentation (if voluminous, attach a summary) or an explanation as to why documentation is not available, and be denominated in United States currency.

PLEASE TAKE FURTHER NOTICE THAT, notwithstanding section 503(b) of the Bankruptcy Code, the Debtors propose that any Requests for Payment be filed without a scheduled hearing date and response deadline or a request by the claimant for a scheduled hearing. To the extent a Covered Administrative Claim is disputed by the Debtors, and such dispute cannot be resolved consensually by the Debtors and the claimant, the Debtors will: (a) file an objection to the claimant's Request for Payment; (b) schedule a hearing on such objection and the affected Request for Payment; and (c) provide notice to the affected claimant of the Debtors' objection and scheduled hearing.

ANY HOLDER OF A COVERED ADMINISTRATIVE CLAIM THAT FAILS TO FILE A REQUEST FOR PAYMENT IN COMPLIANCE WITH THE PROCEDURES SET

FORTH IN THE ADMINISTRATIVE CLAIMS BAR DATE ORDER BY THE ADMINISTRATIVE CLAIMS BAR DATE (I) SHALL BE PROHIBITED FROM PARTICIPATING IN ANY DISTRIBUTION ON ACCOUNT OF SUCH COVERED ADMINISTRATIVE CLAIM IN THIS CHAPTER 11 CASE; AND (II) SHALL BE FOREVER BARRED, ESTOPPED AND ENJOINED FROM ASSERTING SUCH COVERED ADMINISTRATIVE CLAIM AGAINST THE DEBTORS IN THIS CHAPTER 11 CASE.

PLEASE TAKE FURTHER NOTICE that copies of the Administrative Claims Bar Date Order and this Notice may be accessed (i) free of charge at <https://www.donlinrecano.com/Clients/crusse/Static/administrativeexpense>; (ii) free of charge by contacting the Debtors' undersigned counsel; or (iii) viewed and downloaded for a fee at the Bankruptcy Court's website (<http://www.deb.uscourts.gov>) by following the directions for accessing the ECF system on such website.

RESERVATION OF RIGHTS

PLEASE TAKE FURTHER NOTICE that the Debtors and other parties in interest fully reserve the right to dispute or assert offsets or defenses against any asserted Covered Administrative Claim on any grounds.

PLEASE TAKE FURTHER NOTICE THAT RECIPIENTS OF THIS NOTICE SHOULD CONSULT AN ATTORNEY IF THE RECIPIENT HAS ANY QUESTIONS REGARDING ANY CLAIM IT MAY HAVE AGAINST THE DEBTOR(S), INCLUDING WHETHER SUCH RECIPIENT SHOULD FILE A REQUEST FOR PAYMENT OF A COVERED ADMINISTRATIVE CLAIM TO PROTECT ITS INTERESTS. QUESTIONS AND INQUIRIES ALSO MAY BE DIRECTED TO THE CLAIMS AGENT

**AT 1 (877) 864-4836 OR SUBMITTING AN INQUIRY VIA E-MAIL TO
CRINFO@DONLINRECANO.COM.**

Dated: November 5, 2019 **BAYARD, P.A.**
Wilmington, Delaware

/s/ Justin R. Alberto

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