IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
MUJI U.S.A. LIMITED, ¹	Case No. 20-11805 (MFW)
Debtor.	

NOTICE OF (I) FILING OF BANKRUPTCY PETITION
AND RELATED DOCUMENTS AND (II) <u>AMENDED</u>² AGENDA FOR
TELEPHONIC HEARING ON FIRST DAY MOTIONS SCHEDULED FOR
JULY 14, 2020 AT 10:30 A.M. (PREVAILING EASTERN TIME),
BEFORE THE HONORABLE MARY WALRATH, AT THE
UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

THE HEARING WILL BE HELD TELEPHONICALLY VIA COURTCALL AND, IN CERTAIN CIRCUMSTANCES, BY VIDEO VIA ZOOM. ONLY THOSE PARTIES THAT WILL BE ADDRESSING THE COURT SHOULD APPEAR BY VIDEO VIS ZOON IN ADDITION TO THEIR COURTCALL REGISTRATION.

TO APPEAR BY VIDEO CONFERENCE,
PARTIES SHOULD USE THE FOLLOWING INFORMATION:
JOIN ZOOMGOV HEARING: https://debuscourts.zoomgov.com/j/1611703423
MEETING ID: 161 170 3423 PASSWORD: 859448

<u>PLEASE NOTE</u>: AUDIO MUST BE MUTED IN ZOOM ONCE CONNECTED. COURTCALL, LLC WILL PROVIDE THE AUDIO FOR THE HEARING.

TO APPEAR TELEPHONICALLY, PARTIES SHOULD CONTACT

PLEASE TAKE NOTICE that on July 10, 2020, the above-captioned debtor and debtor in possession (the "**Debtor**") filed the following voluntary petition (the "**Petition**") for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532:

¹ The last four digits of the Debtor's federal identification number are (2229). The location of the Debtor's principal place of business is 250 West 39th Street, Suite 202, New York, NY 10018.

² Amended items appear in bold.

A. <u>Voluntary Petition</u>:

	<u>Debtor</u>	Case No.
1	MUJI U.S.A. Limited [Docket No. 1]	20-11805 (MFW)

PLEASE TAKE FURTHER NOTICE that in addition to filing the Petition, on July 10 and July 11, 2020, the Debtor filed the following first day motions and related documents (collectively, the "First Day Motions"):

B. First Day Declaration:

1. Declaration of John Bittner in Support of the Debtor's Chapter 11 Petition and Requests for First Day Relief [Docket No. 13]

C. <u>First Day Motions</u>:

- 1. Application of the Debtor for Entry of an Order Authorizing the Debtor to Employ and Retain Donlin, Recano & Company, Inc. as Claims and Noticing Agent *Nunc Pro Tunc* to the Petition Date [Docket No. 4]
- 2. Motion of the Debtor for Entry of Interim and Final Orders (I) Authorizing the Debtor to Maintain and Administer its Existing Customer Programs and Honor Certain Prepetition Obligations Related Thereto and (II) Granting Related Relief [Docket No. 5]
- 3. Motion of the Debtor for Entry of Interim and Final Orders (I) Authorizing the Debtor Pay Certain Prepetition Claims of Shippers, Warehousemen, and the Customs Broker; and (II) Granting Related Relief [Docket No. 6]
- 4. Motion of the Debtor for Entry of Interim and Final Orders (I) Authorizing the Debtor to Maintain Existing Insurance Policies, Pay All Policy Premiums Arising Thereunder, and Renew Such Policies, (II) Authorizing Banks to Honor and Process Checks and Electronic Transfer Requests Related Thereto, and (III) Granting Related Relief [Docket No. 7]
- 5. Motion of the Debtor for Entry of Interim and Final Orders Authorizing (I) the Debtor to Pay Prepetition Taxes and Regulatory Fees in the Ordinary Course of Business and (II) Banks and Financial Institutions to Honor and Process Checks and Transfers Related Thereto [Docket No. 8]
- 6. Motion of the Debtor for Entry of Interim and Final Orders (I) Authorizing the Debtor to Pay (A) All Prepetition Employee Obligations and (B) Prepetition Withholding Obligations, and (II) Directing Banks to Honor Related Transfers [Docket No. 9]
- 7. Motion of the Debtor for Entry of Interim and Final Orders (I) Prohibiting Utility

Providers From Discontinuing, Altering, or Refusing Service, (II) Authorizing the Proposed Form of Adequate Assurance of Payment; (III) Establishing and Approving Procedures for Resolving Requests by Utility Providers for Additional adequate Assurance; and (IV) Granting Related Relief [Docket No. 10]

- 8. Motion of the Debtor for Entry of Interim and Final Orders (I) Authorizing the Maintenance of Bank Accounts and Continued Use of Existing Business Forms, (II) Authorizing the Continued Use of Cash Management System, (III) Waiving Certain Deposit Guidelines and (IV) Granting Related Relief [Docket No. 11]
- 9. Motion of the Debtor for Entry of Interim and Final Orders (I) Authorizing the Debtor to Obtain Postpetition Financing, (II) Authorizing the Debtor to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Docket No. 12]
 - a. Declaration of John Bittner in Support of Motion of the Debtor for Entry of Interim and Final Orders (I) Authorizing the Debtor to Obtain Postpetition Financing, (II) Authorizing the Debtor to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Docket No. 14]
- 10. Motion of the Debtor for Entry of an Order (I) Authorizing the Debtor to Redact Certain Personal Identification Information for Individual Creditors; and (II) Granting Related Relief [Docket No. 21]

PLEASE TAKE FURTHER NOTICE that a telephonic and video hearing with respect to the First Day Motions is scheduled for **July 14, 2020 at 10:30 a.m.** (prevailing Eastern Time) before The Honorable Mary F. Walrath, United States Bankruptcy Judge for the District of Delaware (the "First Day Hearing"). Parties who wish to participate in the First Day Hearing may do so by contacting CourtCall at 866-582-6878 AND by joining the Zoom hearing at https://debuscourts.zoomgov.com/j/1611703423; meeting ID: 161 170 3423; password: 859448.

PLEASE TAKE FURTHER NOTICE that copies of the Petition, First Day Motions, and any other pleadings identified herein may be obtained free of charge through the website of the Debtor's proposed claims and noticing agent at https://www.donlinrecano.com/MUJI.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the First Day Motions may be made at the First Day Hearing.

Dated: July 13, 2020

Wilmington, Delaware

Respectfully submitted,

GREENBERG TRAURIG, LLP

/s/ Dennis A. Meloro

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Proposed Counsel for the Debtor and Debtor in Possession