

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

In re:

MUJI U.S.A. LIMITED,¹

Debtor.

Chapter 11

Case No. 20-11805 (MFW)

**NOTICE OF HEARING TO CONSIDER
CONFIRMATION OF THE CHAPTER 11 PLAN FILED BY THE
DEBTOR AND RELATED VOTING AND OBJECTION DEADLINES**

PLEASE TAKE NOTICE THAT on November 23, 2020, the United States Bankruptcy Court for the District of Delaware (the “Court”) entered an order [Docket No. 230] (the “Disclosure Statement Order”): (a) authorizing MUJI U.S.A. Limited, the debtor and debtor in possession (the “Debtor”) in the above-captioned chapter 11 (the “Chapter 11 Case”), to solicit acceptances for the *Amended Chapter 11 Plan of Reorganization of MUJI U.S.A. Limited Pursuant to Chapter 11 of the Bankruptcy Code* (as amended, supplemented, or otherwise modified from time to time, the “Plan”);² (b) approving the *Disclosure Statement for Amended Chapter 11 Plan of Reorganization of MUJI U.S.A. Limited Pursuant to Chapter 11 of the Bankruptcy Code* (the “Disclosure Statement”) as containing “adequate information” pursuant to section 1125 of the Bankruptcy Code; (c) approving the solicitation materials and documents to be included in the solicitation packages (the “Solicitation Packages”); and (d) approving procedures for soliciting, receiving, and tabulating votes on the Plan and for filing objections to the Plan.

PLEASE TAKE FURTHER NOTICE THAT the hearing at which the Court will consider Confirmation of the Plan (the “Confirmation Hearing”) will commence on **December 21, 2020, at 10:30 a.m. (prevailing Eastern Time)** before the Honorable Mary F. Walrath, United States Bankruptcy Court Judge, in the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 5th Floor, Wilmington, Delaware 19801.

PLEASE BE ADVISED: THE CONFIRMATION HEARING MAY BE CONTINUED FROM TIME TO TIME BY THE COURT OR THE DEBTOR **WITHOUT FURTHER NOTICE** OTHER THAN BY SUCH ADJOURNMENT BEING ANNOUNCED IN OPEN COURT OR BY A NOTICE OF ADJOURNMENT FILED WITH THE COURT AND SERVED ON ALL PARTIES ENTITLED TO NOTICE.

¹ The last four digits of the Debtor’s federal tax identification number are 2229. The location of the Debtor’s principal place of business is 250 West 39th Street, Suite 605, New York, NY 10018.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Plan.

CRITICAL INFORMATION REGARDING VOTING ON THE PLAN

Voting Record Date. The voting record date is **November 20, 2020** which is the date for determining which Holders of Claims in Classes 3 and 4 are entitled to vote on the Plan.

Voting Deadline. The deadline for voting on the Plan is on **December 14, 2020 at 4:00 p.m. (prevailing Eastern Time)** (the “Voting Deadline”). If you received a Solicitation Package, including a Ballot and intend to vote on the Plan you *must*: (a) follow the instructions carefully; (b) complete *all* of the required information on the Ballot; and (c) execute and return your completed Ballot according to and as set forth in detail in the voting instructions so that it is *actually received* by the Debtor’s notice and claims agent, Donlin, Recano & Company, Inc. (the “Notice and Claims Agent”) on or before the Voting Deadline. *A failure to follow such instructions may disqualify your vote.*

CRITICAL INFORMATION REGARDING RELEASES

ARTICLE IX OF THE PLAN CONTAINS RELEASE, EXCULPATION, AND INJUNCTION PROVISIONS, AND ARTICLE IX.C CONTAINS A CONSENSUAL RELEASE. THUS, YOU ARE ADVISED TO REVIEW AND CONSIDER THE PLAN CAREFULLY BECAUSE YOUR RIGHTS MIGHT BE AFFECTED THEREUNDER.

ALL HOLDERS OF CLASS 3 CLAIMS THAT VOTE TO ACCEPT THE PLAN AND DO NOT TIMELY OPT OUT OF THE CONSENSUAL RELEASE PURSUANT TO THE PROCEDURES AUTHORIZED IN THE DISCLOSURE STATEMENT ORDER WILL BE DEEMED TO HAVE CONSENTED TO THE CONSENSUAL RELEASE.

CRITICAL INFORMATION REGARDING OBJECTING TO THE PLAN

Plan Objection Deadline. The deadline for filing objections to the Plan is **December 14, 2020 at 4:00 p.m. (prevailing Eastern Time)** (the “Plan Objection Deadline”). All objections to the relief sought at the Confirmation Hearing *must*: (a) be in writing; (b) conform to the Bankruptcy Rules, the Local Rules, and any orders of the Court; (c) state, with particularity, the legal and factual basis for the objection and, if practicable, a proposed modification to the Plan (or related materials) that would resolve such objection; *and* (d) be filed with the Court (contemporaneously with a proof of service) and served upon the following parties so as to be *actually received* on or before the Plan Objection Deadline:

| <i>Counsel to the Debtor</i> | |
|---|---|
| Greenberg Traurig, LLP Dennis A. Meloro The Nemours Building 1007 North Orange Street, Suite 1200 Wilmington, Delaware 19801 Telephone: (302) 661-7000 Facsimile: (302) 661-7360 Email: melorod@gtlaw.com | Greenberg Traurig, LLP Shari L. Heyen David R. Eastlake 1000 Louisiana Street, Suite 1700 Houston, Texas 77002 Telephone: (713) 374-3500 Facsimile: (713) 374-3505 Email: heyens@gtlaw.com eastlaked@gtlaw.com |
| <i>U.S. Trustee</i> | |
| Attn: David Buchbinder Office of the United States Trustee for the District of Delaware 844 King Street Wilmington, Delaware 19801 | |
| <i>Counsel to the DIP Lender and the Prepetition Lender</i> | |
| Chipman Brown Cicero & Cole, LLP William E. Chipman, Jr. Mark D. Olivere Hercules Plaza 1313 North Market Street, Suite 5400 Wilmington, Delaware 19801 Telephone: (302) 295-0191 Email: chipman@chipmanbrown.com olivere@chipmanbrown.com | |

ADDITIONAL INFORMATION

Obtaining Solicitation Materials. The materials in the Solicitation Package are intended to be self-explanatory. If you should have any questions or if you would like to obtain additional solicitation materials, please feel free to contact the Debtor's Notice and Claims Agent, by: (1) calling the Notice and Claims Agent at 1 (800) 813-0529 (toll free) or (212) 771-1128 (international); (2) visiting the Debtor's restructuring website at: <https://www.donlinrecano.com/Clients/mu/Index>; and/or (3) writing to the Notice and Claims Agent at: (a) if by mail, Donlin, Recano & Company, Inc., Re: MUJI U.S.A. Limited, Attn: Voting Department, PO Box 199043 Blythebourne Station, Brooklyn, New York 11219; and (b) if by hand delivery or overnight courier, Donlin, Recano & Company, Inc., Re: MUJI U.S.A. Limited, Attn: Voting Department, 6201 15th Ave., Brooklyn, New York 11219. Please be advised that the Notice and Claims Agent is authorized to answer questions about, and provide additional copies of, solicitation materials, but may *not* advise you as to whether you should vote to accept or reject the Plan. You may also obtain copies of any pleadings filed in this Chapter 11 Case for a fee via PACER at: <http://www.deb.uscourts.gov>.

The Plan Supplement. The Debtor will file the Plan Supplement (as defined in the Plan) on or before **December 7, 2020** and will serve on all parties on the 2002 List.

BINDING NATURE OF THE PLAN:

IF CONFIRMED, THE PLAN SHALL BIND ALL HOLDERS OF CLAIMS OR INTERESTS TO THE MAXIMUM EXTENT PERMITTED BY APPLICABLE LAW, WHETHER OR NOT SUCH HOLDER WILL RECEIVE OR RETAIN ANY PROPERTY OR INTEREST IN PROPERTY UNDER THE PLAN, HAS FILED A PROOF OF CLAIM OR INTEREST IN THE CHAPTER 11 CASE, OR FAILED TO VOTE TO ACCEPT OR REJECT THE PLAN OR VOTED TO REJECT THE PLAN.

GREENBERG TRAURIG, LLP

/s/ Shari L. Heyen

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Dated: November 23, 2020

/s/ Dennis A. Meloro

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Counsel for the Debtor and Debtor in Possession