

**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: (I) ENTRY OF ORDER CONFIRMING AMENDED
CHAPTER 11 PLAN OF REORGANIZATION OF MUJI U.S.A.
LIMITED PURSUANT TO CHAPTER 11 OF THE BANKRUPTCY CODE
(AS MODIFIED); (II) OCCURRENCE OF EFFECTIVE DATE;
AND (III) BAR DATE NOTICE FOR REJECTION DAMAGES,
ADMINISTRATIVE CLAIMS, AND PROFESSIONAL FEE CLAIMS**

PLEASE TAKE NOTICE THAT on December 21, 2020, the Honorable Mary F. Walrath of the United States Bankruptcy Court for the District of Delaware (the “Court”) entered an order [Docket No. 277] (the “Confirmation Order”) confirming the *Amended Chapter 11 Plan of Reorganization of MUJI U.S.A. Limited Pursuant to Chapter 11 of the Bankruptcy Code (as Modified)* [Docket No. 277-1] (as amended, supplemented, or otherwise modified from time to time, the “Plan”).²

A. Occurrence of Effective Date.

PLEASE TAKE FURTHER NOTICE THAT the Plan became effective on December 31, 2020 (the “Effective Date”). Each of the conditions precedent to the Effective Date expressed in Article VIII of the Plan have been satisfied or waived in accordance with the Plan and the Confirmation Order.

PLEASE TAKE FURTHER NOTICE THAT pursuant to the Confirmation Order, the discharge, release, injunction, and exculpation provisions in Article IX of the Plan are now in full force and effect.

B. Rejection Damages Claims Bar Date.

PLEASE TAKE FURTHER NOTICE THAT any and all Executory Contracts or Unexpired Leases not previously assumed or rejected pursuant to an order of the Bankruptcy Court are **deemed rejected** as of the Effective Date.

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 202, New York, NY 10018.

² Capitalized terms not otherwise defined herein shall have the same meanings as set forth in the Plan.

PLEASE TAKE FURTHER NOTICE THAT if you hold any Claims arising from the rejection of an Executory Contract or Unexpired Lease, you must File and serve a proof of Claim (a “Proof of Claim”) so as to be actually received on or before **February 1, 2021** (the “Rejection Damages Claims Bar Date”). Proofs of Claim must be Filed with the Debtor’s Notice and Claims Agent at (a) if sent by United States Postal Service: Donlin, Recano & Company, Inc., Re: MUJI U.S.A. Limited, P.O. Box 199043 Blythebourne Station, Brooklyn, New York 11219; or (b) if sent by hand delivery or overnight delivery: Donlin, Recano & Company, Inc., Re: MUJI U.S.A. Limited, 6201 15th Avenue, Brooklyn, New York 11219. Alternatively, Proofs of Claim may be submitted electronically using the interface available on the following website maintained by the Debtor’s Notice and Claims Agent (<https://www.donlinrecano.com/Clients/mu/FileClaim>).

PLEASE TAKE FURTHER NOTICE THAT any Claims arising from the rejection of an Executory Contract or Unexpired Lease pursuant to the Plan that are not timely Filed by the Rejection Damages Claims Bar Date will be automatically disallowed, forever barred from assertion, and shall not be enforceable against the Debtor, the Reorganized Debtor or their assets and properties, or the Estate, without the need for any objection by the Debtor or the Reorganized Debtor (as applicable) or further notice to, or action, order, or approval of the Bankruptcy Court or any other Entity, and any Claim arising out of the rejection of the Executory Contract or Unexpired Lease shall be deemed fully satisfied, released, and discharged, notwithstanding anything in the Schedules or a Proof of Claim to the contrary. Claims arising from the rejection of the Debtor’s Executory Contracts or Unexpired Leases shall be classified as General Unsecured Claims and shall, if Allowed, be treated in accordance with Article III.B.3 of the Plan.

C. Administrative Claims Bar Date.

PLEASE TAKE FURTHER NOTICE THAT except as otherwise provided in the Plan, Confirmation Order, or with respect to DIP Facility Claims and Administrative Claims that are Professional Fee Claims, Holders of Administrative Claims must File and serve requests for payment of Administrative Claims (“Administrative Claim Requests”) so as to be actually received on or before **February 1, 2021** (the “Administrative Claims Bar Date”) by the following parties: (i) counsel to the Reorganized Debtor, (a) Greenberg Traurig, LLP, The Nemours Building, 1007 North Orange Street, Suite 1200, Wilmington, Delaware 19801, Attn: Dennis A. Meloro, Esq. (melorod@gtlaw.com), and (b) Greenberg Traurig, LLP, 1000 Louisiana Street, Suite 1700, Houston, Texas 77002, Attn: Shari L. Heyen, Esq. (heyens@gtlaw.com); (ii) Mackinac Partners LLC, 200 Crescent Court, Suite 240, Dallas, TX 75201, Attn: John Bittner (jbittner@mackinacpartners.com); (iii) counsel to the DIP Lender, Chipman Brown Cicero & Cole, Hercules Plaza, 1313 N. Market Street, Suite 5400, Wilmington, DE 19801, Attn: William E. Chipman, Jr. (Chipman@ChipmanBrown.com); and (iv) the Office of the United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Wilmington, DE 19801, Attn: David L. Buchbinder, Esq. (David.L.Buchbinder@usdoj.gov).

PLEASE TAKE FURTHER NOTICE THAT an Administrative Claim Request must include, at a minimum: (i) the name of the Holder of the Administrative Claim, (ii) the amount of the Administrative Claim, and (iii) the basis of the Administrative Claim (including any documentation or evidence supporting such Administrative Claim).

PLEASE TAKE FURTHER NOTICE THAT Holders of Administrative Claims that are required to File and serve a request for allowance and payment of such Administrative Claims that do not File and serve such a request by the Administrative Claim Bar Date shall be forever barred, estopped, and enjoined from asserting such Administrative Claims against the Debtor, the Reorganized Debtor or their assets and properties, or the Estate, and such Administrative Claims shall be deemed discharged as of the Effective Date without the need for any notices, objection, or other action from the Reorganized Debtor or any action or approval by the Bankruptcy Court.

D. Professional Fee Claims Bar Date.

PLEASE TAKE FURTHER NOTICE THAT pursuant to the Plan and Confirmation Order, all final requests for Professional Fee Claims incurred during the period from the Petition Date through and including the Confirmation Date must be filed with the Court (“Final Fee Applications”) by no later than **February 1, 2021** (the “Professional Fee Claims Bar Date”).

PLEASE TAKE FURTHER NOTICE THAT all Final Fee Applications will be subject to approval by the Bankruptcy Court after notice and a hearing in accordance with the procedures established by the Bankruptcy Code, Bankruptcy Rules, and prior orders of the Bankruptcy Court, including the *Order Establishing Procedures for Monthly, Interim, and Final Compensation and Reimbursement of Expenses of Professionals Retained in this Chapter 11 Case and Reimbursement of Expenses of Committee Members Appointed in this Chapter 11 Case* [Docket No. 100], and once approved by the Bankruptcy Court, shall be promptly paid by the Reorganized Debtor, including with funds from the Professional Fee Escrow Account, up to the full Allowed amount.

PLEASE TAKE FURTHER NOTICE THAT all Final Fee Applications must (a) be in writing; (b) comply with the Bankruptcy Rules, the Local Rules and any orders of the Court entered in this Chapter 11 Case; and (c) be filed with the Bankruptcy Court and served upon the following parties: (i) counsel to the Reorganized Debtor, (x) Greenberg Traurig, LLP, The Nemours Building, 1007 North Orange Street, Suite 1200, Wilmington, Delaware 19801, Attn: Dennis A. Meloro, Esq. (melorod@gtlaw.com), and (y) Greenberg Traurig, LLP, 1000 Louisiana Street, Suite 1700, Houston, Texas 77002, Attn: Shari L. Heyen, Esq. (heyens@gtlaw.com); (ii) Mackinac Partners LLC, 200 Crescent Court, Suite 240, Dallas, TX 75201, Attn: John Bittner (jbittner@mackinacpartners.com); (iii) counsel to the DIP Lender, Chipman Brown Cicero & Cole, Hercules Plaza, 1313 N. Market Street, Suite 5400, Wilmington, DE 19801, Attn: William E. Chipman, Jr. (Chipman@ChipmanBrown.com); and (iv) the Office of the United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Wilmington, DE 19801, Attn: David L. Buchbinder, Esq. (David.L.Buchbinder@usdoj.gov).

E. Other Information.

PLEASE TAKE FURTHER NOTICE THAT the Plan and Confirmation Order contain other provisions which may affect your rights. You are encouraged to review the Plan and Confirmation Order in their entirety.

PLEASE TAKE FURTHER NOTICE THAT if you would like to obtain a copy of the Disclosure Statement, the Plan, the Plan Supplement, the Confirmation Order, or related

documents, you should 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, 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, 6201 15th Ave., Brooklyn, New York 11219. 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>.

Dated: December 31, 2020
Wilmington, Delaware

Respectfully submitted,

GREENBERG TRAURIG, LLP

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- and -

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