

**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)

Objection Deadline: 8/4/2020 at 4:00 p.m.

Hearing Date: 8/11/2020 at 2:00 p.m.

OMNIBUS NOTICE OF FIRST DAY PLEADINGS AND FINAL HEARING THEREON

PLEASE TAKE NOTICE that, on July 10 and 11, 2020, the above-captioned debtor and debtor in possession (the “Debtor”) filed, among others, the following pleadings with the Court (collectively, the “First Day Pleadings”):²

1. **Customer Programs Motion.** 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](#)]
2. **Shippers and Warehouseman Motion.** 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](#)]
3. **Insurance Motion.** 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](#)]
4. **Taxes Motion.** 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](#)]
5. **Employee Wages Motion.** 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](#)]

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 The Debtor also filed certain other pleadings that were considered at the hearing conducted on July 14, 2020, which are not listed herein. This Omnibus Notice only relates to matters which were granted on an interim basis.

6. **Utilities Motion.** 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](#)]
7. **Cash Management Motion.** 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](#)]
8. **DIP Financing Motion.** 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](#)]

PLEASE TAKE FURTHER NOTICE that a hearing on the First Day Pleadings (and certain other pleadings) was held on July 14, 2020, at which time the Court approved the First Day Pleadings on an interim basis and entered the following orders (collectively, the “Interim Orders”):

1. Interim Order (I) Authorizing Debtor to Maintain and Administer Its Existing Customer Programs and Honor Certain Prepetition Obligations Related Thereto and (II) Granting Related Relief [Docket No. [32](#)];
2. Interim Order (I) Authorizing the Debtor to Pay Certain Prepetition Claims of Shippers, Warehousemen, and the Customs Broker; and (II) Granting Related Relief [Docket No. [33](#)];
3. Interim Order (I) Authorizing 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. [34](#)];
4. Interim Order 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. [35](#)];
5. Interim Order (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. [36](#)];
6. Interim Order (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. [37](#)];

7. Interim Order (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. [38](#)]; and
8. Interim Order (I) Authorizing the Debtor to Obtain Post-Petition 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. [41](#)].

PLEASE TAKE FURTHER NOTICE that a telephonic hearing to consider final approval of the First Day Pleadings is scheduled for **August 11, 2020 at 2:00 p.m. (EDT)** at the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 5th Floor, Wilmington, Delaware 19801 before the Honorable Mary F. Walrath, United States Bankruptcy Judge for the District of Delaware.

PLEASE TAKE FURTHER NOTICE that any responses or objections to approval of the First Day Pleadings on a final basis must be in writing, filed with the Clerk of the Bankruptcy Court, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before **August 4, 2020 at 4:00 p.m. (EDT)**, and served upon: (a) the Debtor, MUJI U.S.A., Ltd., 250 West 39th Street, Suite 202, New York, New York 10018 (Attn: Syunsuke Shibata, Director [syunsbt@muji.co.jp]); (b) proposed counsel for the Debtor, (i) Greenberg Traurig, LLP, 1000 Louisiana Street, Suite 1700, Houston, Texas 77002 (Attn: Shari L. Heyen, Esq. [heyens@gtlaw.com] and David R. Eastlake, Esq. [eastlaked@gtlaw.com]), and (ii) Greenberg Traurig, LLP, 1007 North Orange Street, Suite 1200, Wilmington, Delaware 19801 (Attn: Dennis A. Meloro, Esq. [melorod@gtlaw.com]); (c) the Office of the United States Trustee, J. Caleb Boggs Federal Building, 844 King Street, Lockbox 35, Wilmington, Delaware 19801 (Attn: David Buchbinder, Esq. [David.L.Buchbinder@usdoj.gov]); (d) counsel to the Prepetition Lender and DIP Lender, Chipman Brown Cicero & Cole, LLP, Hercules Plaza, 1313 North Market Street, Suite 5400, Wilmington, Delaware 19801 (Attn: William E. Chipman, Jr., Esquire [chipman@chipmanbrown.com] and Mark D. Olivere, Esquire [olivere@chipmanbrown.com]); and (e) counsel to any official committee appointed in this case.

PLEASE TAKE FURTHER NOTICE that copies of the First Day Pleadings, and any of the related Interim Orders, are available from the website of the court appointed claims agent, Donlin Recano & Company, Inc., dedicated to this chapter 11 case, www.donlinrecano.com/muji, **free of charge**.

PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS TO THE FIRST DAY PLEADINGS ARE TIMELY FILED, SERVED, AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THEN THE COURT MAY GRANT THE FINAL RELIEF REQUESTED IN CONNECTION WITH SUCH FIRST DAY PLEADINGS WITHOUT FURTHER NOTICE OR HEARING.

Dated: July 16, 2020
Wilmington, Delaware

Respectfully submitted,

GREENBERG TRAURIG, LLP

/s/ Dennis A. Meloro

Dennis A. Meloro (DE Bar No. 4435)
The Nemours Building
1007 North Orange Street, Suite 1200
Wilmington, Delaware 19801
Telephone: (302) 661-7000
Email: melorod@gtlaw.com

- and -

Shari L. Heyen (admitted *pro hac vice*)
David R. Eastlake (admitted *pro hac vice*)
1000 Louisiana, Suite 1700
Houston, TX 77002
Telephone: (713) 374-3500
Email: heyens@gtlaw.com
eastlaked@gtlaw.com

- and -

David M. Guess (admitted *pro hac vice*)
18565 Jamboree Road, Suite 500
Irvine, CA 92612
Telephone: (949) 732-6500
Email: guessd@gtlaw.com

*Proposed Counsel for the Debtor and
Debtor in Possession*