

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

PIZZAEXPRESS FINANCING 2 PLC, *et al.*,

Debtor in a Foreign Proceeding,¹

)
) Chapter 15
)
) Case No. 20-34868 (MI)
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)
)

**NOTICE OF RECOGNITION HEARING
ON FOREIGN RECOGNITION PROCEEDING**

PLEASE TAKE NOTICE that on October 4, 2020, Andrew Pellington, as the authorized foreign representative (the “Foreign Representative”) of the above-captioned debtor (the “Debtor”) regarding the Debtor’s restructuring plan (the “Restructuring Plan”) pursuant to Part 26A of the Companies Act, currently pending before the High Court of Justice of England and Wales (the “English Proceeding”), filed a *Verified Petition for (I) Recognition of Foreign Main Proceeding, (II) Recognition of Foreign Representative, and (III) Related Relief under Chapter 15 of the Bankruptcy Code* (the “Verified Petition”) pursuant to sections 105(a), 1507, 1510, 1515, 1517, 1520, and 1521 of title 11 of the United States Code (the “Bankruptcy Code”) with the United States Bankruptcy Court for the Southern District of Texas (the “Bankruptcy Court”).

PLEASE TAKE FURTHER NOTICE that, among other things, the Debtor seeks entry of an order recognizing the English Proceeding as a foreign main proceeding pursuant to

¹ The last four digits of Debtor PizzaExpress Financing 2 plc’s foreign identification number are 9629. The location of the Debtor’s service address for purposes of this chapter 15 case is: Hunton House Highbridge Estate, Oxford Road, Uxbridge UB8 ILX, United Kingdom. Additional information may be obtained on the website of the Debtor’s claims and noticing agent at <https://www.donlinrecano.com/pizzaexpress>.

section 1517 of the Bankruptcy Code and granting certain additional relief pursuant to sections 105(a), 1507, 1510, 1515, and 1521 of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE that the Bankruptcy Court has scheduled a hearing with respect to the Verified Petition (the “Recognition Hearing”) for **2:00 p.m. (prevailing Central Time) on November 3, 2020.**

PLEASE TAKE FURTHER NOTICE that any party-in-interest wishing to submit a response or objection to the Verified Petition must do so in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules, and such response or objection must be in writing and must set forth the basis for the response or objection. The response or objection must be filed with the Bankruptcy Court **no later than October 29, 2020, at 4:00 p.m. (prevailing Central Time).**

PLEASE TAKE FURTHER NOTICE that copies of the Verified Petition filed by the Foreign Representative may be obtained free of charge by visiting the Bankruptcy Court’s website at <http://www.txs.uscourts.gov> (a PACER login and password are required to retrieve a document), or by visiting the claims agent’s website at <https://www.donlinrecano.com/pizzaexpress>.

PLEASE TAKE FURTHER NOTICE that hearings in this matter, including the Recognition Hearing, shall take place at the United States Bankruptcy Court of the Southern District of Texas, 515 Rusk Street, Houston, Texas 77002.

Electronic Appearances

Please note that on March 24, 2020, through the entry of General Order 2020-10, the Bankruptcy Court invoked the Protocol for Emergency Public Health or Safety Conditions (the “Emergency Protocol”). General Order 2020-10 may be found at:

[https://www.txs.uscourts.gov/sites/txs/files/Bankruptcy%20General%20Order%202020-04%20Adoption%20of%20Contingency%20Plan 0.pdf](https://www.txs.uscourts.gov/sites/txs/files/Bankruptcy%20General%20Order%202020-04%20Adoption%20of%20Contingency%20Plan%200.pdf)

On April 27, 2020, the Bankruptcy Court entered General Order 2020-11, which extended the Emergency Protocol with certain modifications. Therefore, all persons will appear telephonically and also may appear via video at this hearing using the Bankruptcy Court's electronic conference systems.

The Bankruptcy Court will simultaneously use two technology methods to conduct electronic hearings. One method will provide audio communication. The other will provide video access to exhibits and materials presented to the Bankruptcy Court. If a party wants to both view the documents presented to the Bankruptcy Court and hear the proceeding, the party must 1) dial in through the audio system, and 2) log into the Bankruptcy Court's video via GoToMeeting.

Hearing appearances should be made electronically and in advance of the hearing. You may make your electronic appearance by:

- 1) Going to the Southern District of Texas website;
- 2) Selecting "Bankruptcy Court" from the top menu;
- 3) Selecting "Judges' Procedures and Schedules";
- 4) Selecting "View Home Page" for Judge Isgur;
- 5) Under "Electronic Appearance" select "Click here to submit electronic appearance;"
- 6) Select PizzaExpress Financing 2 PLC from the list of electronic appearance links, and
- 7) After selecting PizzaExpress Financing 2 PLC from the list, complete the required fields and hit the "Submit" button at the bottom of the page.

Submitting your appearance electronically in advance of the hearing will negate the need to make an appearance on the record at the hearing.

Audio Communication:

Audio communication will be conducted by use of the Bankruptcy Court's regular dial-in number: **832-917-1510**. At the start of the call, the caller will be asked to enter a six-digit conference code. The six-digit conference code for this hearing is Judge Isgur's conference room number: 954554. Each caller shall be responsible for its own long-distance charges.

Parties are encouraged to review the Bankruptcy Court's procedures for telephonic appearances located at <https://www.txs.uscourts.gov/sites/txs/files/Court%20Procedures%20-%20202-1-2020.pdf>.

Attorneys, witnesses, and parties-in-interest wishing to participate in the hearing must connect to each hearing by audio communication. Any person who wishes to attend the hearing may also dial in to the audio conference dial-in number.

Each person who speaks at the electronic hearing should be prepared to restate that person's name each time that the person speaks in order to assist any transcriber of the audio recording.

Video Communication:

The Debtor will offer evidence and demonstrative exhibits from a remote location. Parties may participate in electronic hearings by use of an internet connection. The internet site is <https://www.gotomeeting.com/meeting/join-meeting>. A GoToMeeting application is available for download to computers. Persons connecting by mobile device will need to download the free GoToMeeting application.

Once connected to GoToMeeting, a participant must enter the meeting ID. The meeting ID for joining this hearing before Judge Isgur is "judgeisgur". In the next screen, participants

should enter their name in the lower left-hand corner. Then, click “Notify” to join the conference.

Any exhibit offered by the Debtor will be filed on the Bankruptcy Court’s docket. Any party may also obtain an electronic copy of the exhibits by request to counsel to the Foreign Representative.

If any party wishes to offer exhibits, it is required that these exhibits be filed on CM/ECF. Each exhibit should be filed as a separate attachment to an Exhibit List in compliance with BLR 90132.

Witnesses presented by the Debtor will appear via audio and video connection. Any person wishing to examine the witness will be permitted to do so during the hearing.

PLEASE TAKE FURTHER NOTICE that at such hearing the Bankruptcy Court may order the scheduling of a case management conference to consider the efficient administration of this chapter 15 case.

PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read the Verified Petition carefully and discuss it with your attorney, if you have one in connection with this chapter 15 case. If you do not have an attorney, you may wish to consult one.

PLEASE TAKE FURTHER NOTICE that if you do not want the Bankruptcy Court to grant the relief requested by the Foreign Representative, or if you want the Bankruptcy Court to consider your views on any matter requested at the Recognition Hearing, then you or your attorney must attend such hearing. If you or your attorney do not take these steps, the Bankruptcy Court may decide that you do not oppose the relief sought by the Foreign Representative and may enter an order granting the relief requested.

Houston, Texas
October 5, 2020

/s/ Matthew D. Cavanaugh

Matthew D. Cavanaugh (TX Bar No. 24062656)

Veronica A. Polnick (TX Bar No. 24079148)

Victoria N. Argeroplos (TX Bar No. 24105799)

JACKSON WALKER LLP

1401 McKinney Street, Suite 1900

Houston, TX 77010

Telephone: (713) 752-4200

Facsimile: (713) 752-4221

Email: mcavanaugh@jw.com
vpolnick@jw.com
vargeroplos@jw.com

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP

David R. Seligman, P.C. (*pro hac* vice pending)

Laura Elizabeth Krucks (*pro hac* vice pending)

300 North LaSalle Street

Chicago, Illinois 60654

Telephone: (312) 862-2000

Facsimile: (312) 862-2200

Email: david.seligman@kirkland.com
laura.krucks@kirkland.com