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#### **COUNSEL FOR THE DEBTOR**

## UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

IN RE:	§	CHAPTER 11
	§	
VASARI, LLC,	§	CASE NO. 17-44346-mxm-11
	§	
<b>DEBTOR.</b>	§	Complex Case
	§	-
	§	

NOTICE OF (1) HEARING ON CONFIRMATION OF THE PLAN, (2) HEARING ON MOTION FOR VALUATION OF SECURED CLAIM OF CADENCE BANK N.A., (3) DEADLINE AND PROCEDURES FOR FILING OBJECTIONS TO CONFIRMATION OF THE PLAN, (4) VOTING RECORD DATE, AND (5) VOTING DEADLINE FOR RECEIPT OF BALLOTS

### TO ALL CREDITORS OF VASARI, LLC:

PLEASE TAKE NOTICE that Vasari, LLC (the "Debtor"), debtor and debtor-in-possession in the above-captioned bankruptcy case, is soliciting acceptances of that certain *Second Amended Plan of Reorganization for Vasari, LLC* dated as of May 16, 2018 (as may be amended, the "Plan"), from holders of impaired claims who are (or may be) entitled to receive distributions under the Plan.

PLEASE TAKE FURTHER NOTICE that on May 17, 2018, the Bankruptcy Court entered an order (the "Order") approving the *Second Amended Disclosure Statement for Chapter 11 Plan of Reorganization for Vasari, LLC* dated as of May 16, 2018 (the "Disclosure Statement") relating to the Plan.

PLEASE TAKE FURTHER NOTICE that the hearing to consider confirmation of the Plan (the "Confirmation Hearing") will be held on <u>June 15, 2018 at 9:00 a.m.</u> (<u>Prevailing Central Time</u>), before the Honorable Mark X. Mullin for the United States Bankruptcy Court for the Northern District of Texas, Fort Worth Division, Eldon B. Mahon U.S. Courthouse, 501 W. 10<sup>th</sup> Street, Room 128, Fort Worth, Texas, 76102-3643. The Confirmation Hearing may be continued from time to time by announcing such continuance in open court should further time be required, and the Plan may be further modified, if necessary, pursuant to 11 U.S.C. § 1127 prior to, during, or as a result of the Confirmation Hearing, without further notice to parties-in-interest.

PLEASE TAKE FURTHER NOTICE that the *Official Committee of Unsecured Creditors' Emergency Motion Pursuant to 11 U.S.C. §§ 105(a) and 506(a) and Federal Rule of Bankruptcy Procedure 3012 for Valuation of Secured Claim of Cadence Bank, N.A.* will also be held on **June 15, 2018 at 9:00 a.m. (Prevailing Central Time)** in conjunction with the Confirmation Hearing.

PLEASE TAKE FURTHER NOTICE that pursuant to the Order, <u>June 12, 2018 at 5:00 p.m.</u> (<u>Prevailing Central Time</u>), shall be the last date and time for filing and serving objections to confirmation of the Plan (the "Objection Deadline"). To be considered, objections, if any, must (a) be in writing, (b) comply with the Federal Rules of Bankruptcy Procedure and the Bankruptcy Rules for the United States Bankruptcy Court for the Northern District of Texas, (c) set forth the name of the objector and the nature and amount of any claim or interest asserted by the objector against or in the Debtor, its estate, or its property, (d) state with particularity the legal and factual bases for the objection, including suggested language to be added or existing language to be amended or deleted, and (e) be filed with the Court together with proof of service and served by personal service, overnight delivery, first class mail, or facsimile, so as to be **RECEIVED** no later than the Objection Deadline by the following (collectively, the "Notice Parties"):

Vickie L. Driver **HUSCH BLACKWELL LLP** 2001 Ross Avenue, Suite 2000 Dallas, Texas 75201

Lisa L. Lambert

Office of the United States Trustee
1100 Commerce Street, Room 976

Dallas, Texas 75242

Objections not timely filed and served in the matter set forth above shall not be considered and shall be deemed overruled.

PLEASE TAKE FURTHER NOTICE that pursuant to the terms of the Order, May 16, 2018 shall be the record date for determining the creditors entitled to vote to accept or reject the Plan (the "Voting Record Date").

PLEASE TAKE FURTHER NOTICE that if you hold a claim against the Debtor as of the Voting Record Date and are entitled to vote to accept or reject the Plan, a form of ballot and voting instructions appropriate to your claim are included herewith. For your vote to be counted, ballots to accept or reject the Plan must be executed, completed and **RECEIVED** by <u>4:00 p.m.</u> (Prevailing Central Time) on June 12, 2018 (the "Voting Deadline"), by Donlin Recano & Company, Inc. (the "Voting Agent") at the address below:

If by U.S. Mail:

Donlin, Recano & Company, Inc.

Re: Vasari, LLC

Attn: Voting Department

P.O. Box 192016 Blythebourne Station

Brooklyn, NY 11219

If by overnight courier or hand delivery:

Donlin, Recano & Company, Inc. Re: Vasari, LLC Attn: Voting Department

6201 15<sup>th</sup> Avenue Brooklyn, NY 11219

# BALLOTS THAT ARE NOT RECEIVED BY THE VOTING DEADLINE WILL NOT BE COUNTED.

PLEASE TAKE FURTHER NOTICE that any party-in-interest wishing to obtain information about the solicitation procedures and copies of the Disclosure Statement, the Plan, or any exhibits thereto, may request such information or copies by contacting the Voting Agent at the above address. All documents that are filed with the Bankruptcy Court may be reviewed (during regular business hours) at the United States Bankruptcy Court for the Northern District of Texas, Fort Worth Division, Eldon B. Mahon U.S. Courthouse, 501 W. 10<sup>th</sup> Street, Fort Worth, Texas, 76102-3643 or may be viewed online at <a href="http://www.txnb.uscourts.gov">http://www.txnb.uscourts.gov</a>. All documents filed in the Debtor's case may be viewed free of charge online at <a href="https://www.donlinrecano.com/Clients/vasari/Index">https://www.donlinrecano.com/Clients/vasari/Index</a>.

Dated: May 17, 2018. Respectfully submitted,

/s/ Vickie L. Driver

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and

Alexander Terras Illinois Bar No. 2810700 (admitted pro hac vice)

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