

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

In re:

VELOCITY HOLDING COMPANY, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 17-12442 (KJC)

(Jointly Administered)

Hearing Date: February 14, 2018 at 11:00 a.m. (ET)  
Obj. Deadline: February 7, 2018 at 4:00 p.m. (ET)

**NOTICE OF HEARING ON DISCLOSURE STATEMENT**

**PLEASE TAKE NOTICE** that, on January 10, 2018, Velocity Holding Company, Inc. and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “Debtors”), filed the (i) *Joint Chapter 11 Plan of Reorganization of Velocity Holding Company, Inc. and its Affiliated Debtors* (as may be modified, amended, or supplemented from time to time, the “Proposed Plan”);<sup>2</sup> the (ii) *Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of Velocity Holding Company, Inc. and its Affiliated Debtors* (as may be as may be modified, amended, or supplemented from time to time, the “Proposed Disclosure Statement”), and the (iii) *Debtors’ Motion for Entry of an Order (I) Approving the Adequacy of the Disclosure Statement, (II) Approving the Solicitation and Notice Procedures With Respect to Confirmation of the Debtors’ Proposed Joint Plan of Reorganization, (III) Approving the Forms of Ballots and Notices in Connection Therewith, (IV) Scheduling Certain Dates With Respect Thereto, and (V) Granting Related Relief* (the “Solicitation Procedures Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”).

**PLEASE TAKE FURTHER NOTICE** that a hearing (the “Disclosure Statement Hearing”) will be held on **February 14, 2018 at 11:00 a.m. (prevailing Eastern Time)** before the Honorable Kevin J. Carey, United States Bankruptcy Judge, United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 5<sup>th</sup> Floor, Courtroom No. 5, Wilmington, Delaware 19801, to consider the entry of an order determining, among other things, that the Proposed Disclosure Statement contains “adequate information” within the meaning ascribed to such term in section 1125 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”) and approving the Proposed Disclosure Statement. Please be advised that

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, include: Velocity Holding Company, Inc. (1790); Velocity Pooling Vehicle, LLC (4630); Ed Tucker Distributor, Inc. (9197); Ralco Holdings, Inc. (0707); Rally Holdings, LLC (0707); Tucker Rocky Corporation (5967); Tucker-Rocky Georgia, LLC (8121); Motorsport Aftermarket Group, Inc. (0080); DFR Acquisition Corp. (4542); J&P Cycles, LLC (2512); Kuryakyn Holdings, LLC (2341); MAG Creative Group, LLC (4754); MAGNET Force, LLC (2635); Motorcycle Superstore, Inc. (1046); Motorcycle USA LLC (8994); Mustang Motorcycle Products, LLC (3660); Performance Machine, LLC (3924); Renthal America, Inc. (3827); and V&H Performance, LLC (2802). The location of the Debtors’ service address is 651 Canyon Drive, Suite 100, Coppell, Texas 75019.

<sup>2</sup> Capitalized terms not otherwise defined herein have the same meanings as set forth in the Plan.

the Disclosure Statement Hearing may be continued from time to time by the Bankruptcy Court or the Debtors without further notice other than by such adjournment being announced in open court or by a notice of adjournment filed with the Bankruptcy Court and served on the list of parties entitled to notice.

**PLEASE TAKE FURTHER NOTICE** that, a copy of the Proposed Disclosure Statement, Proposed Plan, and Solicitation Procedures Motion may be examined by any party in interest: (i) between the hours of 8:00 a.m. and 4:00 p.m. (prevailing Eastern Time), Monday through Friday, excluding federal holidays, at the Office of the Clerk of the Bankruptcy Court, 824 N. Market St., 3rd Floor, Wilmington, DE 19801; (ii) by request to the Debtors' counsel via email to [kkarstetter@coleschotz.com](mailto:kkarstetter@coleschotz.com); and (iii) at the website of Debtors' claims and noticing agent, Donlin, Recano & Company, Inc., [www.donlinrecano.com/vhc](http://www.donlinrecano.com/vhc). In addition, copies of the documents can also be downloaded for a fee from the Court's website, [www.deb.uscourts.gov](http://www.deb.uscourts.gov). To access documents on the Court's website, you will need a PACER password and login which can be obtained at [www.pacer.psc.uscourts.gov](http://www.pacer.psc.uscourts.gov).

**PLEASE TAKE FURTHER NOTICE** that, objections, if any, to the Proposed Disclosure Statement (an "Objection") must (a) be made in writing; (b) comply with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure and the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware; (c) state the name of the objecting party and the nature and amount of claims or interests held or asserted by such party against or in the Debtors' estates or property; (d) state with particularity the legal and factual basis for the objection and, if practicable, a proposed modification to the Proposed Disclosure Statement (or related materials) that would resolve such objection; and (e) be filed with the Bankruptcy Court and served upon the Debtors' counsel, Proskauer Rose LLP, 70 West Madison, Suite 3800, Chicago, Illinois 60602, Attn: Jeff J. Marwil, Paul V. Possinger, Christopher M. Hayes and Jeramy D. Webb and Cole Schotz P.C., 500 Delaware Avenue, Suite 1410, Wilmington, DE 19801, Attn: Norman L. Pernick and Patrick J. Reilly, so as to be **actually received** on or before **4:00 p.m. (Eastern Time) on February 7, 2018.**

**IF AN OBJECTION TO THE PROPOSED DISCLOSURE STATEMENT IS NOT FILED AND SERVED AS PRESCRIBED HEREIN, THE OBJECTING PARTY MAY BE BARRED FROM OBJECTING TO THE PROPOSED DISCLOSURE STATEMENT OR THE ADEQUACY THEREOF AND MAY NOT BE HEARD AT THE HEARING.**

[SIGNATURE ON NEXT PAGE]

Dated: January 10, 2018

Respectfully submitted,

**COLE SCHOTZ P.C.**

/s/Patrick J. Reilley

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*Counsel to the Debtors and Debtors in Possession*