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13 *Debtors in Possession*

14 **UNITED STATES BANKRUPTCY COURT**  
15 **NORTHERN DISTRICT OF CALIFORNIA**  
16 **SAN JOSE DIVISION**

17  
18 In re: ) Case No. 20-50682 (MEH)  
19 WAVE COMPUTING, INC., *et al.*, )  
20 Debtors.<sup>1</sup> ) Chapter 11 (Joint Administration Requested)  
21 ) Assigned to the Hon. M. Elaine Hammond  
22 ) **NOTICE OF HEARING ON SHORTENED**  
23 ) **TIME AND PROPOSED AGENDA FOR**  
24 ) **FIRST DAY MOTIONS AND FIRST DAY**  
25 ) **HEARING**  
26 )  
27 )  
28 )

26 <sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax  
27 identification number, as applicable, are: Wave Computing, Inc. (4264), MIPS Tech, Inc. (8247),  
28 Hellosoft, Inc. (8640), Wave Computing (UK) Limited (None), Imagination Technologies, Inc.  
(6967), Caustic Graphics, Inc. (7272), and MIPS Tech, LLC (2161). The Debtors' mailing address is  
3201 Scott Blvd, Santa Clara, CA 95054.

)  
) Hearing Scheduled:  
) Date: April 28, 2020  
) Time: 2:00 p.m. (Pacific Time)  
) Place: 280 South 1st St.  
) San Jose, CA 95113-3099  
)  
)  
)

**PLEASE TAKE NOTICE** that on April 27, 2020 (the “Petition Date”), Wave Computing, Inc. (“Wave”) and its debtor affiliates, as debtors and debtors in possession (collectively, the “Debtors”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) with the United States Bankruptcy Court for the Northern District of California (San Jose Division) (the “Bankruptcy Court”).

**PLEASE TAKE FURTHER NOTICE** that a hearing is scheduled for April 28, 2020 at 2:00 p.m. (Prevailing Pacific Time) (the “First Day Hearing”), before the Honorable M. Elaine Hammond, United States Bankruptcy Judge, in 11 on the 3rd Floor at 280 S 1st St., San Jose, CA 95113.

**PLEASE TAKE FURTHER NOTICE** that a proposed agenda with respect to the First Day Hearing is set forth below. At the First Day Hearing, the Court will hear the motions and applications filed by the Debtors and listed in Section II of the proposed agenda below (the “First Day Motions”). Copies of each pleading identified below can be viewed and/or obtained by: (i) accessing the Court’s website at <http://www.canb.uscourts.gov>, (ii) contacting the Office of the Clerk of the Court at 450 Golden Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors’ proposed notice and claims agent, Donlin Recano & Company, Inc. (“Donlin Recano”), at [www.donlinrecano.com/wavecomp](http://www.donlinrecano.com/wavecomp) center toll free at: 1-877-476-4390 or submit an inquiry via e-mail to [wavecompinfo@donlinrecano.com](mailto:wavecompinfo@donlinrecano.com).

Note that a PACER password is needed to access documents on the Court’s website.

**PLEASE TAKE FURTHER NOTICE** that any objections or responses to the First Day Motions shall be filed and served so as to be actually received on or prior to April 28, 2020 at 12:00 p.m. (Prevailing Pacific Time).

1 **AGENDA FOR FIRST DAY HEARING ON APRIL 28, 2020 AT 2:00 p.m.**<sup>2</sup>

2 **I. Introduction/Opening Statement**

- 3 • Sam Newman (Sidley Austin, LLP)
- 4 • Charles Persons (Sidley Austin, LLP)

5 **II. Motions and Applications to Be Heard at First Day Hearing**

6 **a. Administrative and Procedural Motions**

- 7 i. **Joint Administration Motion.** Motion of Debtors Pursuant to Fed. R. Bankr.  
8 P. 1015(b) for Entry of Order Directing Joint Administration of Chapter 11  
9 Cases [Dkt. No. 2].
- 10 ii. **Creditor Matrix and Notice of Commencement Motion.** Motion of  
11 Debtors Pursuant to 11 U.S.C. §§ 105(a), 342(a), and 521(a)(1) and Fed. R.  
12 Bankr. P. 1007 and 2002 for Entry of Order (I) Waiving the Requirements to  
13 File Lists of Creditors and Equity Holders and Granting Related Relief; and  
14 (II) Authorizing and Approving Procedures for Providing Notice of the  
15 Commencement of Chapter 11 Cases [Dkt. No. 3].
- 16 iii. **Motion for Extension of Time to File Schedules and Statements.** Motion  
17 of Debtors Pursuant to 11 U.S.C. §§ 521(a) and 105(a) and Fed. R. Bankr. P.  
18 1007(c) for Entry of Order (I) Extending Time to File Schedules of Assets and  
19 Liabilities, (II) Statements of Financial Affairs, and (III) Schedules of  
20 Executory Contracts and Unexpired Leases [Dkt. No. 4].
- 21 iv. **Oversize Briefing Motion.** Motion of Debtors Pursuant to B.L.R. 9013-1(c)  
22 For Entry of Order Authorizing Oversize Briefing for Certain First Day  
23 Motions [Dkt. No. 5].
- 24 v. **Motion to Appoint Claims, Noticing and Solicitation Agent.** Debtors'  
25 Application Pursuant to 28 U.S.C. §§ 156(c) and 105(a) for Appointment of  
26 Donlin Recano & Company, Inc. as Claims and Noticing Agent [Dkt. No. 7].
- 27 1. Declaration of Nellwyn Voorhies in Support of Debtors' Application  
28 for Appointment of Donlin Recano & Company, Inc., as Claims and  
Noticing Agent [Dkt. No. 7, Exhibit B].

23 **b. Operational Motions**

- 24 i. **Utilities Motion.** Motion of Debtors Pursuant to 11 U.S.C. §§ 366 and 105(a),  
25 For Entry of Orders (I) Prohibiting the Utility Providers from Altering,  
26 Refusing or Discontinuing Services, (II) Determining Adequate Assurance of

28 <sup>2</sup> Docket entry numbers relate to Case Number [●] unless otherwise indicated.

1 Payment for Postpetition Services; and (III) Establishing Procedures for  
2 Determining Adequate Assurance [Dkt. No. 8].

3 ii. **Employee Wages and Benefits Motion.** Motion of Debtors Pursuant to 11  
4 U.S.C. §§ 105(a), 363(b), and 507 and Fed. R. Bankr. P. 6003 and 6004 for  
5 Interim and Final Authority to (I) Pay Prepetition Wages, Salaries, Employee  
6 Benefits, and Other Compensation and Benefits; (II) Maintain Employee  
7 Benefits Programs and Pay Related Administrative Obligations; and (III)  
8 Authorize Banks and Other Financial Institutions to Honor and Process  
9 Related Checks and Transfers [Dkt. No. 9].

10 iii. **Insurance Motion.** Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a),  
11 362(d), 363(b), 363(c), and 364 and Fed. Bankr. P. 4001, 6003, and 6004 for  
12 Interim and Final Orders (I) Authorizing the Debtors to Maintain Insurance  
13 Policies, Workers' Compensation Program, and Pay All Obligations With  
14 Respect Thereto; and (II) Granting Relief From the Automatic Stay with  
15 Respect to Workers' Compensation Claims [Dkt No. 10].

16 iv. **Cash Management Motion.** Motion of Debtors Pursuant to 11 U.S.C. §§  
17 105(a), 363(b), and 507 and Fed. R. Bankr. P. 6003 and 6004 for Interim and  
18 Final Orders (I)(A) Authorizing Continuation of Debtors' Existing Cash  
19 Management System, (B) Authorizing Continued Intercompany Transactions,  
20 and (C) Granting Related Relief [Dkt. No. 11].

21 v. **Motion to Seal Exhibit B of Debtors' Critical Vendor Motion.** Motion of  
22 Debtors Pursuant to 11 U.S.C. §§ 105(a) and 107(b) for Entry of an Order  
23 Authorizing the Sealing of Exhibit B to the Critical Vendor Motion [Dkt.  
24 No. 12].

25 vi. **Critical Vendor Motion.** Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a),  
26 363(b), and 503 For Entry of Orders (I) Authorizing the Payment of Critical  
27 Vendors; and (II) Granting Related Relief [Dkt. No. 13].

28 vii. **DIP Financing Motion.** Motion of Debtors Pursuant to 11 U.S.C. §§ 105,  
362, 363, 364, 503 and 507 and Fed. R. Bankr. P. 2002, 4001, 6003, 6004 and  
9014 for Interim and Final Orders (I) Authorizing the Debtors to Obtain  
Senior Secured, Superpriority, Postpetition Financing, (II) Granting Liens and  
Superpriority Claims, (III) Modifying the Automatic Stay, (IV) Scheduling  
Final Hearing, and (V) Granting Related Relief [Dkt. No. 14].

1. Declaration of Lawrence R. Perkins in Support of Debtors' Motion  
Pursuant to 11 U.S.C. §§ 105, 362, 363, 364, 503 and 507 and Fed. R.  
Bankr. P. 2002, 4001, 6003, 6004 and 9014 for Interim and Final  
Orders (I) Authorizing the Debtors to Obtain Senior Secured,  
Superpriority, Postpetition Financing, (II) Granting Liens and  
Superpriority Claims, (III) Modifying the Automatic Stay, (IV)  
Scheduling Final Hearing, and (V) Granting Related Relief [Dkt.  
No. 15].

1 **III. OTHER FILED DOCUMENTS THE COURT MAY CONSIDER:**

- 2 a. Declaration of Lawrence R. Perkins in Support of First Day Motions and Related  
3 Relief [Dkt. No. 16].
- 4 b. The Voluntary Chapter 11 Petitions of:
- 5 • Wave Computing, Inc. [Dkt. No. 1]
  - 6 • Wave Computing (UK) Limited, Case No. 20-50686 [Dkt. No. 1]
  - 7 • MIPS Tech, Inc., Case No. 20-50683 [Dkt. No. 1]
  - 8 • MIPS Tech, LLC, Case No. 20-50692 [Dkt. No. 1]
  - 9 • Hellosoft, Inc., Case No. 20-50685 [Dkt. No. 1]
  - 10 • Caustic Graphics, Inc., Case No. 20-50690 [Dkt. No. 1]
  - 11 • Imagination Technologies, Inc., Case No. 20-50689 [Dkt. No. 1]
- 12 c. Any other document filed in these Chapter 11 Cases and related Adversary  
13 Proceedings

14 Dated: April 27, 2020

Respectfully submitted,

SIDLEY AUSTIN LLP

16 /s/ Samuel A. Newman  
17 Samuel A. Newman

18 Proposed Attorneys for Debtors and  
19 Debtors in Possession