

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

In re:

ADARA ENTERPRISES CORP.,

Debtor.¹

Chapter 11

Case No. 21-10736 (JKS)

RE: D.I. 6, 9, 11, 30, 31, 32

**OMNIBUS NOTICE OF HEARING WITH RESPECT
TO FINAL APPROVAL OF THE INTERIM RELIEF MOTIONS**

PLEASE TAKE NOTICE that on April 22, 2021 the above-captioned debtor and debtor-in-possession (the “Debtor”), by and through undersigned counsel, filed certain pleadings with the United States Bankruptcy Court for the District of Delaware, 824 N. Market St., 3rd Fl., Wilmington, DE 19801 (“Bankruptcy Court”), seeking “first-day” relief (collectively, the “First Day Pleadings”).

PLEASE TAKE FURTHER NOTICE that a hearing on the First Day Pleadings was held on April 26, 2021, after which the Court entered orders granting relief requested in the following First Day Pleadings (the “Interim Relief Motions”) on an interim basis (the “Interim Orders”):

1. Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to Utilize Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured parties; (III) Authorizing Unsecured Debtor in possession Financing; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [D.I. 6; Interim Order – D.I. 32].
2. Motion of the Debtor for the Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Pay Certain Prepetition Wages and Compensation, (B) Maintain and Continue Employee Benefit Programs, and (C) Pay Reimbursable Expense Obligations, and (II) Authorizing Banks to Honor and Process Checks and Transfers Related to Such Employee Obligations [D.I. 9; Interim Order – D.I. 30].

¹ The last four digits of the Debtor's federal tax identification number are 8502. The Debtor's address is 411 E 57th Street Suite 1-A, New York, New York 10022.

3. Motion of the Debtor for Entry of Interim and Final Orders (I) Approving Continued Use of Cash Management System; (II) Authorizing the Debtor to Open and Close Bank Accounts; (III) Authorizing Banks to Honor Certain Transfers; (IV) Suspending the Requirements of 11 U.S.C. § 345(b); and (V) Granting Related Relief [D.I. 11; Interim Order – D.I. 31].

PLEASE TAKE FURTHER NOTICE that a hearing to consider final approval of the Interim Relief Motions will be held before The Honorable J. Kate Stickles at the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Courtroom No. 7 Wilmington, Delaware 19801 on **May 11, 2021 at 11:00 am (ET)**.

PLEASE TAKE FURTHER NOTICE that, responses, if any, to the entry of orders approving the First Day Pleadings on a final basis, must be filed with the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, Wilmington, Delaware 19801, on or before **May 4, 2021 at 4:00 p.m. (ET)** (the “Objection Deadline”) and served upon (i) the Debtor, 411 East 57th Street Suite 1-A, New York, New York 10022 (Attn: Daniel Strauss); (ii) proposed counsel for the Debtor, (a) Loeb & Loeb LLP, 345 Park Avenue, New York, New York 10154 (Attn: Daniel Besikof, Esq., dbesikof@loeb.com and Bethany Simmons, Esq., bsimmons@loeb.com), and (b) Gellert, Scali, Busenkell & Brown, LLC, 1201 N. Orange Street, Suite 300, Wilmington, Delaware 19801 (Attn: Ronald Gellert, Esq., rgellert@gsbblaw.com); (iii) the Office of the United States Trustee, J. Caleb Boggs Federal Building, 844 King Street, Lockbox 35, Wilmington, Delaware 19801 (Attn: Joseph McMahon, Esq., joseph.mcmahon@usdoj.gov); (iv) counsel to ESW Holdings, Inc., (a) Goulston & Storrs PC, 885 Third Avenue, 18th Floor, New York, New York 10022 (Attn: Trevor Hoffmann, Esq. thoffmann@goulstonstorrs.com) and (b) Morris, Nichols, Arsht & Tunnell LLP, 1201 N. Market Street, 16th Floor, P.O. Box 1347, Wilmington, Delaware 19899 (Attn: Derek C. Abbott, Esq., DAbbott@MNAT.com); (v) counsel to GlassBridge Enterprises, Inc., The Rosner Law Group, 824 N. Market Street, Suite 810,

Wilmington, Delaware 19801 (Attn: Frederick R. Rosner, Esq., rosner@teamrosner.com); and
(vi) counsel to the official committee of unsecured creditors appointed in this Chapter 11 Case, if
any (collectively, the “Notice Parties”).

**PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN
ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF
DEMANDED IN THE FIRST DAY PLEADINGS ON A FINAL BASIS WITHOUT
FURTHER NOTICE OR HEARING**

Dated: April 26, 2021
Wilmington, Delaware

Respectfully submitted,

GELLERT SCALI BUSENKELL & BROWN LLC

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– and –

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Proposed Counsel to the Debtor and Debtor in Possession