

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

In re:)	Chapter 11
)	
APPGATE, INC., <i>et al.</i> , ¹)	Case No. 24-10956 (CTG)
)	
Debtors.)	(Joint Administration Requested)
)	

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
FIRST DAY HEARING ON MAY 8, 2024 AT 1:00 P.M. (EASTERN TIME)
BEFORE THE HONORABLE CRAIG T. GOLDBLATT**

**This proceeding will be conducted remotely via Zoom.
Please refer to Judge Goldblatt’s Chambers Procedures
(<https://www.deb.uscourts.gov/content/judge-craig-t-goldblatt>) and the Court’s website
(<http://www.deb.uscourts.gov/ecourt-appearances>) for information on the method of allowed
participation (video or audio), Judge Goldblatt’s expectations of remote participants, and the
advance registration requirements. Registration is required by one-hour prior to the hearing
unless otherwise noticed using the *eCourtAppearances* tool available on the Court’s website.**

RELATED MATTERS

- A. Voluntary Petitions
1. Appgate, Inc., Case No. 24-10956 (CTG) (Filed May 6, 2024) [D.I. No. 1]
 2. Appgate Cybersecurity, Inc., Case No. 24-10957 (CTG) (Filed May 6, 2024) [D.I. No. 1]
 3. Cryptzone Worldwide, Inc., Case No. 24-10958 (CTG) (Filed May 6, 2024) [D.I. No. 1]
 4. Cryptzone International Holdings Inc., Case No. 24-10959 (CTG) (Filed May 6, 2024) [D.I. No. 1]
 5. Cryptzone North America Inc., Case No. 24-10960 (CTG) (Filed May 6, 2024) [D.I. No. 1]

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Appgate, Inc. (7231); Appgate Cybersecurity, Inc. (5215); Cryptzone Worldwide, Inc. (3539); Cryptzone International Holdings, Inc. (6133); Cryptzone North America, Inc. (6777); Immunity, Inc. (3955); Immunity Federal Services, LLC (9722); Immunity Products, LLC (9570); Immunity Services, LLC (9647); Easy Solutions Enterprises Corp. (1954); Catbird Networks, Inc. (6028); and Easy Solutions, Inc. (0401). The location of the Debtors’ service address is: 2 Alhambra Plaza, Suite PH-1-B, Coral Gables, Florida 33134.

6. Immunity, Inc., Case No. 24-10961 (CTG) (Filed May 6, 2024) [D.I. No. 1]
 7. Immunity Federal Services, LLC, Case No. 24-10962 (CTG) (Filed May 6, 2024) [D.I. No. 1]
 8. Immunity Products, LLC, Case No. 24-10963 (CTG) (Filed May 6, 2024) [D.I. No. 1]
 9. Immunity Services, LLC, Case No. 24-10964 (CTG) (Filed May 6, 2024) [D.I. No. 1]
 10. Easy Solutions Enterprises Corp., Case No. 24-10965 (CTG) (Filed May 6, 2024) [D.I. No. 1]
 11. Catbird Networks, Inc., Case No. 24-10966 (CTG) (Filed May 6, 2024) [D.I. No. 1]
 12. Easy Solutions, Inc., Case No. 24-10967 (CTG) (Filed May 6, 2024) [D.I. No. 1]
- B. Declaration of Rene Rodriguez, Chief Financial Officer of Appgate, Inc., in Support of Chapter 11 Petitions and First Day Motions (Filed May 6, 2024) [D.I. No. 25]

MATTERS GOING FORWARD

C. First-Day Motions

1. Debtors' Motion for Entry of an Order (I) Directing Joint Administration of Chapter 11 Cases and (II) Granting Related Relief (Filed May 6, 2024) [D.I. No. 3]

Status: This matter will be going forward.

2. Application of Debtors for Appointment of Donlin, Recano & Company, Inc. as Claims and Noticing Agent (Filed May 6, 2024) [D.I. No. 4]

Status: This matter will be going forward.

3. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Redact Certain Personally Identifiable Information of Natural Persons; (II) Waiving the Requirement to File a List of Equity Security Holders; and (III) Granting Related Relief (Filed May 6, 2024) [D.I. No. 5]

Status: This matter will be going forward.

4. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System, (B)

Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Debtor Bank Accounts and Business Forms, and (D) Continue Intercompany Transactions, and (II) Granting Related Relief (Filed May 6, 2024) [D.I. No. 6]

Status: This matter will be going forward.

5. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Payment of Certain Taxes and Fees and (II) Granting Related Relief (Filed May 6, 2024) [D.I. No. 7]

Status: This matter will be going forward.

6. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Prepetition Trade Claims in the Ordinary Course of Business, (II) Requiring Creditors to Maintain Customary Terms as a Condition to Payment, and (III) Granting Related Relief (Filed May 6, 2024) [D.I. No. 9]

Status: This matter will be going forward.

7. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue Employee Benefits Programs, and (II) Granting Related Relief (Filed May 6, 2024) [D.I. No. 10]

Status: This matter will be going forward.

8. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Maintain Insurance and Surety Coverage Entered into Prepetition and Pay Related Prepetition Obligations and (B) Renew, Supplement, Modify, or Purchase Insurance and Surety Coverage and (II) Granting Related Relief (Filed May 6, 2024) [D.I. No. 11]

Status: This matter will be going forward.

9. Debtors' Motion for Entry of Interim and Final Orders (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Common Stock and (II) Granting Related Relief (Filed May 6, 2024) [D.I. No. 13]

Status: This matter will be going forward.

10. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Liens and Providing Superpriority Administrative Expense Status, (III) Granting Adequate Protection, (IV) Modifying the Automatic Stay, (V) Scheduling a Final Hearing, and (VI) Granting Related Relief (Filed May 6, 2024) [D.I. No. 17]

Related Documents:

- (a) Declaration of Adam Waldman in Support of the Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Granting Adequate Protection, (IV) Modifying the Automatic Stay, (V) Scheduling a Final Hearing, and (VI) Granting Related Relief (Filed May 6, 2024) [D.I. No. 18]
- (b) Declaration of Thomas Studebaker in Support of the Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Granting Adequate Protection, (IV) Modifying the Automatic Stay, (V) Scheduling a Final Hearing, and (VI) Granting Related Relief (Filed May 6, 2024) [D.I. No. 19]

Status: This matter will be going forward.

- 11. Debtors' Motion for Entry of an Order (I) Scheduling a Combined Disclosure Statement Approval and Plan Confirmation Hearing, (II) Approving Related Dates, Notices, and Procedures, (III) Approving the Solicitation Procedures and Related Dates, Deadlines, and Notices, (IV) Conditionally Waiving the Requirements that (A) The U. S. Trustee Convenes a Meeting of Creditors and (B) The Debtors File Schedules and SOFAs and Rule 2015.3 Financial Reports, and (V) Granting Related Relief (Filed May 6, 2024) [D.I. No. 22]

Related Documents:

- (a) Joint Prepackaged Plan of Reorganization of Appgate, Inc. and Its Debtor Subsidiaries Pursuant to Chapter 11 of the Bankruptcy Code (Filed May 6, 2024) [D.I. No. 16]
- (b) Disclosure Statement Relating to the Joint Prepackaged Plan of Reorganization of Appgate, Inc. and Its Debtor Subsidiaries Pursuant to Chapter 11 of the Bankruptcy Code (Filed May 6, 2024) [D.I. No. 17]
- (c) Affidavit of Donlin Recano and Company, Inc. Regarding Service of Solicitation Packages with Respect to Disclosure Statement Relating to the Joint Prepackaged Plan of Reorganization of Appgate, Inc. and Its Debtor Subsidiaries Pursuant to Chapter 11 of the Bankruptcy Code (Filed May 6, 2024) [D.I. No. 23]

- (d) Declaration of Lisa C. Terry Regarding the Solicitation and Tabulation of Votes on the Joint Prepackaged Plan of Reorganization of Appgate, Inc. and Its Debtor Subsidiaries Pursuant to Chapter 11 of the Bankruptcy Code (Filed May 6, 2024) [D.I. No. 24]

Status: This matter will be going forward.

Dated: May 6, 2024
Wilmington, Delaware

/s/ Patrick J. Reilley

Patrick J. Reilley (No. 4451)

Stacy L. Newman (No. 5044)

Jack M. Dougherty (No. 6784)

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