

1 BRIAN L. DAVIDOFF (SBN 102654)
BDavidoff@GreenbergGlusker.com
2 KEITH PATRICK BANNER (SBN 259502)
KBanner@GreenbergGlusker.com
3 GREENBERG GLUSKER FIELDS CLAMAN
& MACHTINGER LLP
4 1900 Avenue of the Stars, 21st Floor
Los Angeles, California 90067-4590
5 Telephone: 310.553.3610
6 Fax: 310.553.0687

7 Proposed General Bankruptcy Counsel for
Debtor and Debtor in Possession

8
9 UNITED STATES BANKRUPTCY COURT
10 CENTRAL DISTRICT OF CALIFORNIA
11 LOS ANGELES DIVISION

12 In re:
13 B&B Liquidating, LLC,
14
15 Debtor and Debtor in Possession.

Case No. 2:18-bk-11744-NB

Chapter 11

**NOTICE OF FILING OF, AND HEARINGS
ON EMERGENCY "FIRST DAY"
MOTIONS**

Emergency Hearing:

Date: February 22, 2018

Time: 2:00 p.m.

**Place: Courtroom 1545
255 E. Temple Street
Los Angeles, CA 90012**

16
17
18
19
20
21 **TO THE HONORABLE NEIL W. BASON, UNITED STATES BANKRUPTCY**
22 **JUDGE, THE UNITED STATES TRUSTEE, THE 20 LARGEST UNSECURED**
23 **CREDITORS, SIENA LENDING GROUP, LLC, AND ALL OTHER PARTIES-IN-**
24 **INTEREST HEREIN, AND THEIR RESPECTIVE COUNSEL:**

25 **PLEASE TAKE NOTICE** that on February 18, 2018, the Debtor and Debtor-in-
26 Possession B&B Liquidating, LLC, f/k/a B&B Bachrach, LLC, (the "Debtor") filed a voluntary
27 petition (the "Petition") for relief pursuant to chapter 11 of title 11 of the United States Code (the
28 "Bankruptcy Code").

1 **PLEASE TAKE FURTHER NOTICE** that the Debtor filed the following emergency
2 “first day” motions on February 19, 2018 and February 20, 2018 (collectively the “First Day
3 Motions”) seeking relief on an emergency basis pursuant to Local Bankruptcy Rule 9075-1(a):

- 4 1. *Emergency Motion for Order Limiting Scope of Notice* [Docket No. 3];
- 5 2. *Emergency Motion for Order: (1) Prohibiting Utilities from Altering, Refusing or*
6 *Discontinuing Service; (2) Deeming Utilities Adequately Assured of Future*
7 *Performance; and (3) Establishing Procedures for Determining Adequate Assurance*
8 *of Payment* [Docket No. 4];
- 9 3. *Emergency Motion for Order: (1) Authorizing the Debtor to Pay Pre-Petition Sales,*
10 *Use and Similar Taxes in the Ordinary Course of Business; and (2) Directing Banks*
11 *and Financial Institutions to Honor and Process Checks and Transfers Related*
12 *Thereto* [Docket No. 5];
- 13 4. *Emergency Motion for Order: (1) Authorizing the Maintenance and Continued Use of*
14 *Cash Management System; (2) Prohibiting Banks From Offsetting or Freezing*
15 *Debtors Existing Bank Accounts; and (3) Authorizing Continuation of Electronic*
16 *Payment Processing and the Honoring of Related Pre-Petition Obligations in the*
17 *Ordinary Course of Business* [Docket No. 6]
- 18 5. *Emergency Omnibus Motion for Order Authorizing Debtor: (1) To Reject Certain*
19 *Unexpired Leases of Nonresidential Real Property Retroactively to the Petition Date;*
20 *and (2) to Reject Certain Unexpired Leases of Nonresidential Real Property Pursuant*
21 *to Rejection Notice Procedures* [Docket No. 7];
- 22 6. *Emergency Motion for Order:(1) Authorizing Debtor in Possession to Honor Certain*
23 *Prepetition Employee Wages and Benefits in the Ordinary Course Of Business; (2)*
24 *Authorizing Administration and Maintenance of Employee Benefits and Programs; (3)*
25 *Directing Banks and Financial Institutions to Honor and Process Checks and*
26 *Transfers Related Thereto; and (4) Granting Related Relief* [Docket No. 8];
- 27 7. *Emergency Motion for Interim and Final Order: (1) Authorizing the Conducting of*
28 *Inventory Liquidation, Store Closing or Similar Themed Sales; (2) Approving the*
Assumption of Consulting Agreement with Liquidation Consultant Great American
Group, LLC/Tiger Capital Group, LLC; and (3) Related Relief [Docket No. 17]; and
8. *Emergency Motion for Interim and Final Orders Approving Stipulation with Siena*
Lending Group, LLC: (1) Authorizing Post-Petition Financing; (2) Authorizing the
Debtor's Use of Cash Collateral; and (2) Related Relief [Docket No. 21];

///

///

1 ANY PARTIES NOT OTHERWISE SERVED WITH COPIES OF ANY OF THE
2 INDIVIDUAL FIRST DAY MOTIONS WISHING TO OBTAIN COPIES SHOULD
3 CONTACT PROPOSED COUNSEL TO THE DEBTOR, GREENBERG GLUSKER
4 FIELDS CLAMAN & MACHTINGER LLP, 1900 AVENUE OF THE STARS, 21ST
5 FLOOR, LOS ANGELES, CALIFORNIA 90067, ATTENTION: KEITH PATRICK
6 BANNER, ESQ., TELEPHONE (310) 201-7469; E-MAIL:
7 KBANNER@GREENBERGGLUSKER.COM

8 PLEASE TAKE FURTHER NOTICE that a hearing to consider the First Day Motions
9 will take place before the Honorable Neil W. Bason, United States Bankruptcy Judge, in
10 Courtroom 1545 on **February 22, 2018 at 2:00 p.m.** (the "Emergency Hearing").

11 PLEASE TAKE FURTHER NOTICE that any opposition or objection to the First Day
12 Motions may be filed with the Court and served on proposed counsel via email (at the email
13 address set forth above) prior to the Emergency Hearing, or be made orally at the Emergency
14 Hearing.

15 PLEASE TAKE FURTHER NOTICE that your failure to object or oppose any of the
16 First Day Motions may be deemed by the Court to constitute consent to the relief requested
17 therein.

18
19 DATED: February 20, 2018

GREENBERG GLUSKER FIELDS CLAMAN
& MACHTINGER LLP

20
21 By: */s/ Brian L. Davidoff*

22 BRIAN L. DAVIDOFF
23 KEITH PATRICK BANNER
24 Proposed General Bankruptcy Counsel for
25 Debtor and Debtor in Possession
26
27
28