## IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

In re:

Solution Schapter 11

Corsicana Bedding, LLC, et al., Solution Schapter 11

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# NOTICE OF CLAIMS BAR DATE AND PROCEDURES FOR THE ASSERTION, RESOLUTION, AND ALLOWANCE OF CLAIMS ASSERTED PURSUANT TO 11 U.S.C. § 503(b)(9)

THE 503(B)(9) BAR DATE APPLIES ONLY TO 503(B)(9) CLAIMS (AS DEFINED BELOW). THE GENERAL PROOF OF CLAIM BAR DATE FOR ALL CREDITORS (EXCEPT GOVERNMENTAL UNITS) IS OCTOBER 24, 2022, AND FOR GOVERNMENTAL UNITS, IS JANUARY 21, 2023. DOC. NO. 65.

TO: HOLDERS OF 503(B)(9) CLAIMS AGAINST THE ABOVE-CAPTIONED DEBTORS AND DEBTORS IN POSSESSION:

Please take notice that on June 25, 2022 (the "Petition Date"), Corsicana Bedding, LLC, et al. (collectively, the "Debtors") filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101 through 1330 (the "Bankruptcy Code") in the United States Bankruptcy Court for the Northern District of Texas, Fort Worth Division (the "Court") commencing the above-captioned chapter 11 cases (the "Chapter 11 Cases").

Please take further notice that on August 9, 2022, the Court entered an order (the "503(b)(9) Bar Date Order") granting the Debtors' Motion for Entry of an Order Pursuant to 11 U.S.C. §§ 105(a) and 503(b)(9) Establishing 503(b)(9) Claims Bar Date and Procedures for the Assertion, Resolution, and Allowance of Claims Asserted Pursuant to 11 U.S.C. § 503(b)(9) [Doc. No. 221] (the "503(b)(9) Motion") and establishing September 8, 2022, at 5:00 p.m. (CT) (the "503(b)(9) Claim Filing Deadline") as the last date and time for each person or entity to file proofs of claim pursuant to Bankruptcy Code § 503(b)(9) (a "Proof of 503(b)(9) Claim," and such claims, the "503(b)(9) Claims," and holders of any such claims, "503(b)(9) Claimants"). Only 503(b)(9)

Products, Inc. (4961) ("Master Craft"). The location of the Debtors' service address is P.O. Box 3233, Fort Worth, TX 76113.

<sup>&</sup>lt;sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Corsicana Bedding, LLC (3019) ("Corsicana"); Thetford Leasing LLC (7227) ("Thetford"); Olive Branch Building, LLC (7227) ("Olive Branch"); Eastern Sleep Products Company (1185) ("Eastern Sleep"); Englander-Symbol Mattress of Mississippi, LLC (5490) ("Englander Symbol"); Hylton House Furniture, Inc. (5992) ("Hylton House"); Luuf, LLC (3450) ("Luuf"); Symbol Mattress of Florida, Inc. (4172) ("Symbol Florida"); Symbol Mattress of Pennsylvania, Inc. (3160) ("Symbol Pennsylvania"); Symbol Mattress of Wisconsin, Inc. (0871) ("Symbol Wisconsin"); Symbol Mattress Transportation, Inc. (1185) ("Symbol Transportation"); and Master Craft Sleep

Claimants are required to file Proofs of 503(b)(9) Claims by the 503(b)(9) Claim Filing Deadline. All other claims are governed by the bar dates established by Docket Number 65.

For your convenience, enclosed with this Notice is a Proof of 503(b)(9) Claim form for 503(b)(9) Claims (the "503(b)(9) Claim Form").

As used in this Notice, "503(b)(9) Claims" refer to those certain claims that arise under Bankruptcy Code § 503(b)(9), which provides, in relevant part, "[a]fter notice and a hearing, there shall be allowed administrative expenses. . . including . . . the value of any goods received by the debtor within 20 days before the [Petition Date] in which the goods have been sold to the debtor in the ordinary course of such debtor's business." 11 U.S.C. § 503(b)(9).

YOU ARE RECEIVING THIS NOTICE BECAUSE YOU MAY HAVE OR YOU MAY ASSERT A 503(B)(9) CLAIM IN THE CHAPTER 11 CASES. THEREFORE, YOU SHOULD READ THIS NOTICE CAREFULLY AND DISCUSS IT WITH YOUR ATTORNEY. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.

General Information about the Debtors' Chapter 11 Cases. The Chapter 11 Cases are jointly administered under Case No. 22-90016. The location of the Debtors' service address is P.O. Box 3233, Fort Worth, TX 76113. Additional information about the Chapter 11 Cases is available at the Debtors' Claims Agent Website: https://www.donlinrecano.com/Clients/cbl/Index.

A 503(B)(9) CLAIMANT SHOULD CONSULT AN ATTORNEY IF THE 503(B)(9) CLAIMANT HAS ANY QUESTIONS, INCLUDING WHETHER SUCH 503(B)(9) CLAIMANT SHOULD FILE A PROOF OF 503(B)(9) CLAIM.

### 1. PERSONS OR ENTITIES WHO MUST FILE A PROOF OF 503(B)(9) CLAIM

Any person or entity that has or seeks to assert a 503(b)(9) Claim, which arose, or is deemed to have arisen under Bankruptcy Code § 503(b)(9) MUST FILE A PROOF OF 503(B)(9) CLAIM ON OR BEFORE THE 503(B)(9) CLAIM FILING DEADLINE to potentially receive payment of such 503(b)(9) Claim.

THE FACT THAT YOU HAVE RECEIVED THIS NOTICE DOES NOT MEAN THAT YOU HAVE A 503(B)(9) CLAIM OR THAT THE DEBTORS BELIEVE THAT YOU HAVE A 503(B)(9) CLAIM. A 503(B)(9) CLAIMANT SHOULD CONSULT AN ATTORNEY IF THE 503(B)(9) CLAIMANT HAS ANY QUESTIONS, INCLUDING WHETHER SUCH 503(B)(9) CLAIMANT SHOULD FILE A PROOF OF 503(B)(9) CLAIM.

### 2. WHEN AND WHERE TO FILE

503(b)(9) Claimants should submit a signed original of the 503(b)(9) Claim Form in order to assert a claim pursuant to Bankruptcy Code § 503(b)(9), together with the accompanying documentation referenced below, in person or by mail, hand delivery, overnight courier, or electronically through the website of Donlin, Recano, & Company, Inc. ("DRC"), the Debtors'

claims and notice agent, so as to be <u>actually received</u> by DRC on or before the 503(b)(9) Claim Filing Deadline, as follows:

If by First-Class Mail:
Donlin, Recano & Company, Inc.
Re: Corsicana Bedding, LLC, et al.
P.O. Box 199043
Blythebourne Station
Brooklyn, NY 11219

If by overnight courier or hand delivery: Donlin, Recano & Company, Inc. Re: Corsicana Bedding, LLC, et al. 6201 15th Avenue Brooklyn, NY 11219

Alternatively, Claimants may submit a Proof of 503(b)(9) Claim electronically through DRC's website, <a href="https://www.donlinrecano.com/Clients/cbl/File503b9Claim.">https://www.donlinrecano.com/Clients/cbl/File503b9Claim.</a>

503(b)(9) Claimants wishing to receive acknowledgment that their Proofs of 503(b)(9) Claims were received by DRC must submit (i) a copy of the Proof of 503(b)(9) Claim and (ii) a self-addressed, stamped envelope (in addition to the original 503(b)(9) Claim Form sent to DRC).

503(b)(9) Claimants may also submit a Proof of 503(b)(9) Claim with the Court at the following address:

United States Bankruptcy Court Northern District of Texas Office of the Clerk Eldon B. Mahon U.S. Courthouse 501 W. 10th St. Fort Worth, TX 76102-3643

Alternatively, if a 503(b)(9) Claimant determines to file a Proof of 503(b)(9) Claim through the Bankruptcy Court's website, such 503(b)(9) Claimant **must**: (i) use the 503(b)(9) Claim Form and (ii) upload the completed 503(b)(9) Claim Form to the Electronic Case Filing System for the applicable Debtor. For the avoidance of doubt, 503(b)(9) Claimants should not file 503(b)(9) Claims using the ePOC (Electronic Proof of Claim) system.

Proofs of 503(b)(9) Claims will be deemed timely filed only if actually received on or before the 503(b)(9) Claim Filing Deadline. Facsimile or email submissions will not be accepted.

# 3. CONTENTS OF A 503(B)(9) CLAIM

The Debtors have enclosed a 503(b)(9) Claim Form for use in these Chapter 11 Cases. This 503(b)(9) Claim Form is also available free of charge on DRC's website, https://www.donlinrecano.com/Clients/cbl/Index.

To be valid, your Proof of 503(b)(9) Claim MUST (i) be signed by the 503(b)(9) Claimant; (ii) be written in the English language; (iii) be denominated in lawful currency of the United States; (iv) conform substantially to the 503(b)(9) Claim Form; (v) set forth with specificity the legal and factual basis for the alleged claim; and (vi) include supporting documentation or an explanation as to why such documentation is not available.

The Proof of 503(b)(9) Claim must also set forth (i) the amount of the 503(b)(9) Claim; (ii) the value of the products, supplies, and other goods (collectively, the "Goods") the 503(b)(9) Claimant contends the Debtors received within twenty (20) days before the Petition Date; (iii) documentation, including invoices, receipts, bills of lading, and the like, identifying the particular Goods for which the 503(b)(9) Claim is being asserted; (iv) the specific Debtor that received the Goods, provided that, for the avoidance of doubt, if a 503(b)(9) Claimant has 503(b)(9) Claims against multiple Debtors, a separate Proof of 503(b)(9) Claim must be filed for each specific Debtor; (v) the date the Goods were received by the Debtors and supporting documentation to the extent available to the 503(b)(9) Claimant; (vi) a statement certifying that the Goods with respect to which the 503(b)(9) Claim is being filed were sold in the ordinary course of the claimant's business with the Debtors; and (vii) a statement indicating whether the 503(b)(9) Claimant has filed any other claim against the Debtors regarding the Goods underlying its Proof of 503(b)(9) Claim.

# 4. <u>CONSEQUENCES OF FAILURE TO FILE A PROOF OF 503(B)(9) CLAIM BY THE 503(B)(9) CLAIM FILING DEADLINE</u>

Any Claimant that is required to file a Proof of 503(b)(9) Claim by the 503(b)(9) Claim Filing Deadline, but that fails to do so, shall be forever barred, without further order of the Court, from asserting a 503(b)(9) Claim after the expiration of the 503(b)(9) Claim Filing Deadline.

# 5. <u>RESERVATION OF RIGHTS</u>

Nothing contained in the 503(b)(9) Motion, this Notice, or the 503(b)(9) Bar Date Order is intended or should be construed as: (a) an admission as to the validity of any claim against any Debtor or the existence of any lien against the Debtors' properties; (b) a waiver of the Debtors' or any other party in interest's rights to dispute any claim or lien on any grounds; (c) a promise to pay any claim; (d) an implication or admission that any particular claim would constitute an allowed claim; (e) an assumption or rejection of any executory contract or unexpired lease pursuant to Bankruptcy Code § 365; (f) a limitation on the Debtors' rights under Bankruptcy Code § 365 to assume or reject any executory contract with any party subject to the proposed Order once entered; or (g) a waiver of the Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable law.

## 6. <u>ADDITIONAL INFORMATION</u>

The 503(b)(9) Claim Form, the 503(b)(9) Motion, and the 503(b)(9) Bar Date Order are available free of charge on DRC's website, https://www.donlinrecano.com/Clients/cbl/Index. If you have questions concerning the filing of processing of 503(b)(9) Claims, you may contact the Debtors' claims agent, DRC, toll-free at 1-800-581-5607. If you require additional information regarding the filing of a Proof of 503(b)(9) Claim, you may contact counsel for the Debtors in writing at the addresses below.

Dated: August 9, 2022

### HAYNES AND BOONE, LLP

By: /s/ Stephen M. Pezanosky
Stephen M. Pezanosky
State Bar No. 15881850
Ian T. Peck
State Bar No. 24013306
David L. Staab
State Bar No. 24093194
HAYNES AND BOONE, LLP
301 Commerce Street, Suite 2600
Fort Worth, TX 76102

Telephone: 817.347.6600 Facsimile: 817.347.6650

Email: stephen.pezanosky@haynesboone.com

Email: ian.peck@haynesboone.com Email: david.staab@haynesboone.com

### ATTORNEYS FOR DEBTORS