

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

In re:	§	Chapter 11
	§	
Corsicana Bedding, LLC, <i>et al.</i> , ¹	§	Case No. 22-90016-elm11
	§	
Debtors.	§	Jointly Administered

**NOTICE OF (I) SOLICITATION OF INITIAL BIDS; (II) BIDDING PROCEDURES;
(III) AUCTION; (IV) SALE HEARING AND (V) RELATED RELIEF AND DATES**

TO ALL CREDITORS AND OTHER PARTIES IN INTEREST:

PLEASE TAKE NOTICE that the above-captioned debtors and debtors-in-possession (the “Debtors”) are soliciting offers for the purchase of substantially all of the Assets and assumption of certain liabilities of the Debtors with respect thereto consistent with the bidding procedures (the “Bidding Procedures”) approved by the Bankruptcy Court by entry of an order dated July 28, 2022 [Docket No. 215] (the “Bidding Procedures Order”). Potential Bidders interested in bidding on Assets should contact the Debtors’ investment bankers, Jim Georgeadis (jgeorgeadis@hl.com) and Adam Dunayer (adunayer@hl.com) at Houlihan Lokey, to request a confidentiality agreement. All interested bidders should carefully read the Bidding Procedures and Bidding Procedures Order. To the extent that there are any inconsistencies between this notice and the Bidding Procedures or Bidding Procedures Order, the Bidding Procedures or Bidding Procedures Order, as applicable, shall govern in all respects.

PLEASE TAKE FURTHER NOTICE that, if the Debtors receive more than one qualified bid within the requirements and time frame specified by the Bidding Procedures, an auction will be conducted at the Dallas offices of Haynes and Boone, LLP, 2323 Victory Avenue, Suite 700, Dallas, Texas 75219 and will commence on August 12, 2022, at 10:00 a.m. (Central Time), or such later date and time as selected by the Debtors. The Auction shall be conducted in a timely fashion according to the Bidding Procedures.

PLEASE TAKE FURTHER NOTICE that a hearing to consider approval of the Sale of all or substantially all of the Assets to the Successful Bidder (the “Sale Hearing”) is presently scheduled to take place on August 16, 2022, at 1:30 p.m. (Central Time), or as soon thereafter as counsel may be heard, before the Honorable Edward L. Morris, United States Bankruptcy Judge,

¹ 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 Products, Inc. (4961) (“Master Craft”). The location of the Debtors’ service address is P.O. Box 3233, Fort Worth, TX 76113.

via WebEx at <https://us-courts.webex.com/meet/morris>, or before any other judge who may be sitting in his place and stead.

PLEASE TAKE FURTHER NOTICE that, except as otherwise set forth in the Bidding Procedures Order, objections, if any, to the Sale of the Assets, the assumption and assignment of the Contracts, or any relief requested in the Motion² other than the relief granted by this Court in the Bidding Procedures Order must be: (a) in writing; (b) signed by counsel or attested to by the objecting party; (c) in conformity with the Bankruptcy Rules and applicable local rules; (d) filed with the Clerk of the Bankruptcy Court for the Northern District of Texas, United States Bankruptcy Court, Northern District of Texas –Fort Worth Division, Eldon B. Mahon U.S. Courthouse, 501 W. 10th St., Rm. 147, Fort Worth, Texas 76102, by no later than 5:00 p.m. (Central Time) on August 15, 2022 (the “General Objection Deadline”); and (e) served in accordance with applicable local rules so as to be received on or before the relevant objection deadline by the following (collectively, the “Objection Notice Parties”): (i) counsel to the Debtors, Stephen M. Pezanosky and Ian T. Peck, Haynes and Boone LLP, 301 Commerce St #2600, Fort Worth, TX 76102, stephen.pezanosky@haynesboone.com and ian.peck@haynesboone.com; (ii) counsel for the Stalking Horse Bidder and DIP Term Administrative Agent, Adam C. Harris and Abbey Walsh, Schulte Roth & Zabel LLC, 919 Third Avenue, New York, NY 10022, adam.harris@srz.com and abbey.walsh@srz.com; (iii) counsel for the DIP Revolver Administrative Agent, Brian Swett and Shawn Fox, McGuireWoods LLP, 1251 Avenue of the Americas 20th Floor, New York, NY 10020-1104, bswett@mcguirewoods.com and sfox@mcguirewoods.com; (iv) counsel for any official committee appointed in the Chapter 11 Cases; and (v) Office of the United States Trustee for the Northern District of Texas, 1100 Commerce St # 976, Dallas, TX 75242 (these procedures are collectively referred to as the “General Objection Procedures”). Each objection shall state the legal and factual basis of such objection.

CONSEQUENCES OF FAILING TO TIMELY MAKE AN OBJECTION

ANY PARTY OR ENTITY WHO FAILS TO TIMELY MAKE AN OBJECTION TO THE SALE ON OR BEFORE THE GENERAL OBJECTION DEADLINE IN ACCORDANCE WITH THE BIDDING PROCEDURES ORDER SHALL BE FOREVER BARRED FROM ASSERTING ANY OBJECTION TO THE SALE, INCLUDING WITH RESPECT TO THE TRANSFER OF THE ASSETS FREE AND CLEAR OF ALL LIENS, CLAIMS, ENCUMBRANCES, AND OTHER INTERESTS, EXCEPT AS SET FORTH IN THE APPLICABLE PURCHASE AND SALE AGREEMENT RELATED THERETO. IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT CERTAIN OF THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

PLEASE TAKE FURTHER NOTICE that copies of the Motion, and any exhibits thereto, including the Bidding Procedures Order, Bidding Procedures, and the Stalking Horse APA, are available upon request to counsel for the Debtors, Stephen M. Pezanosky and Ian T. Peck, Haynes and Boone LLP, stephen.pezanosky@haynesboone.com and ian.peck@haynesboone.com.

Dated: July 28, 2022

² As defined in the Bidding Procedures Order.