

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF SOUTH CAROLINA

In re:

CAFE HOLDINGS CORP., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 18-05837(hb)

(Jointly Administered)

**NOTICE OF ENTRY OF INTERIM DIP FINANCING ORDER  
AND HEARING ON PROPOSED FINAL ORDER**

TO: All Creditors and Parties in Interest

**Your rights may be affected. You should read this notice carefully and discuss it with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

1. On November 15, 2018 (the “**Petition Date**”), each of the above-captioned debtors (collectively, the “**Debtors**”) commenced with this Court a voluntary petition under chapter 11 of the Bankruptcy Code. Concurrently therewith, the Debtors filed their *Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition Lenders, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief* [Docket No. 15] (the “**DIP Financing Motion**”).

2. On November 19 and 20, 2018, the Court held hearings to consider the DIP Financing Motion. On November 20, 2018 the Court entered its *Interim Order (1) Authorizing the Debtors to Obtain Post-Petition Financing on an Interim Basis, Granting Senior Postpetition Security Interests and According Superpriority Administrative Expense Status Pursuant to Sections 364(c) And 364(d) of the Bankruptcy Code, (2) Authorizing the Use of Cash Collateral, (3) Granting Adequate Protection, (4) Modifying The Automatic Stay, and (5) Granting Related Relief* [Docket No. 70] (the “**Interim DIP Financing Order**”).

3. **Final Hearing.** Pursuant to paragraph 40 of the Interim DIP Financing Order, the Court has scheduled a hearing (the “**Final Hearing**”) for **December 18, 2018 at 9 a.m. (ET)** to consider the entry of a final order (the “**Proposed Final Order**”) approving the DIP Financing Motion before the Honorable Helen E. Burris, United States Bankruptcy Judge at the United States Bankruptcy Court for the District of South Carolina, 1100 Laurel St., Columbia, SC 29201.

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: Cafe Holdings Corp. (7910); Cafe Enterprises, Inc. (4946); CE Sportz LLC (2009); and CES Gastonia LLC (0863). The location of the Debtors’ corporate headquarters is 4324 Wade Hampton Blvd., Suite B, Taylors, South Carolina 29687.

4. **Objection Deadline.** If you do not want the court to approve the relief sought in the DIP Financing Motion, or if you want the court to consider your views on the DIP Financing Motion, then by no later than **4:00 p.m. (ET) on December 11, 2018** (the “**Objection Deadline**”), you or your attorney must file with the court a written response or objection at the United States Bankruptcy Court for the District of South Carolina, 1100 Laurel Street, Columbia, SC 29201. Responses or objections filed by an attorney must be electronically filed in [ecf.scb.uscourts.gov](http://ecf.scb.uscourts.gov). If you mail your response or objection to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

5. A copy of any objection to the relief sought in the DIP Financing Motion must be served on: (i) the Debtors’ proposed counsel, Haynes and Boone, LLP, Attn: Ian T. Peck and J. Frasher Murphy, 2323 Victory Avenue, Suite 700, Dallas, TX 75219 and McNair Law Firm, P.A., Attn: Robin Stanton and Michael Weaver, 104 South Main Street, Suite 700, Greenville, SC 29601; (ii) the DIP Secured Parties’ counsel, Holland & Knight LLP, Attn: Brent McIlwain, 200 Crescent Court, Suite 1600, Dallas, TX 75201 and Fox Rothschild, Attn: Kevin McCarrell, 2 W. Washington St., Suite 1100, Greenville SC 29601-2784; and (iii) the U.S. Trustee, Attn: Elisabetta G. Gasparini, 1835 Assembly Street, Suite 953, Columbia, SC 29201.

6. The Final Hearing may be continued from time to time by announcing such continuance in open court without further notice to parties in interest, and the proposed final DIP financing order may be modified, if necessary, prior to, during, or as a result of the Final Hearing, without further notice to interested parties

7. **Copies of the DIP Financing Motion, Interim DIP Financing Order and Proposed Final Order may be viewed or obtained at <http://www.donlinrecano.com/cafe> or upon request to the undersigned counsel.**

Date: November 27, 2018

**McNAIR LAW FIRM, P.A.**

/s/ Michael H. Weaver  
Michael H. Weaver (S.C. Dist. Ct. ID # 9847)  
Robin C. Stanton (S.C. Dist. Ct. ID # 7438)  
Weyman C. Carter (S.C. Dist. Ct. ID # 5218)  
1221 Main Street, 18<sup>th</sup> Floor  
Post Office Box 11390  
Columbia, South Carolina 29211  
Tel: (803) 799-9800  
Fax: (803) 753-3277  
[mweaver@mcnair.net](mailto:mweaver@mcnair.net)  
[rstanton@mcnair.net](mailto:rstanton@mcnair.net)  
[wcarter@mcnair.net](mailto:wcarter@mcnair.net)

- AND -

**HAYNES AND BOONE, LLP**

/s/ Ian T. Peck

Ian T. Peck (admitted *pro hac vice*)

(TX Bar No. 24013306)

J. Frasher Murphy (admitted *pro hac vice*)

(TX Bar No. 24013214)

David L. Staab (admitted *pro hac vice*)

(TX Bar No. 24093194)

2323 Victory Avenue, Suite 700

Dallas, Texas 75219

Tel: (214) 651-5000

Fax: (214) 651-5940

Email: [ian.peck@haynesboone.com](mailto:ian.peck@haynesboone.com)

Email: [frasher.murphy@haynesboone.com](mailto:frasher.murphy@haynesboone.com)

Email: [david.staab@haynesboone.com](mailto:david.staab@haynesboone.com)

*Proposed Counsel for the Debtors  
and Debtors in Possession*