

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF SOUTH CAROLINA

In re:

CAFE HOLDINGS CORP. *et al.*,¹

Debtors.

Chapter 11

Case No. 18-05837 (hb)

(Jointly Administered)

**NOTICE OF PROPOSED FINAL ORDERS FOR MATTERS
SCHEDULED FOR HEARING ON DECEMBER 6, 2018**

PLEASE TAKE NOTICE that as a result of discussions with various parties in interest, the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) have revised certain proposed final orders (the “**Proposed Final Orders**”), which will be presented to the Court at the hearing scheduled for December 6, 2018. Copies of the Proposed Final Orders, along with redline comparisons to the previously entered interim orders, are attached hereto as follows:

Exhibit A: Final Order (I) Authorizing the Debtors to Pay Certain Prepetition Claims (A) Arising Under the Perishable Agricultural Commodities Act and Similar Trust Fund Statutes, (B) of Other Lien Claimants, and (C) of Certain Critical Vendors, (II) Granting Certain Related Relief;

Exhibit B: Final Order (A) Authorizing the (I) Continued Use of the Debtors’ Existing Cash Management System and (II) Use of Existing Bank Accounts and Business Forms; (B) Authorizing Payments of Prepetition Costs and Fees Associated with Customer Credit and Debit Card Transactions; (C) Conditionally Waiving the Requirements of Section 345(B) of the Bankruptcy Code; and (D) Granting Certain Related Relief;

¹ 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.

- Exhibit C: Final Order Authorizing Debtors to Honor Prepetition Obligations to Customers and Otherwise Continue Customer Programs in the Ordinary Course;
- Exhibit D: Final Order Authorizing Debtors (I) to Maintain Their Insurance Programs and Surety Bond Program; (II) to Honor all Obligations with Respect Thereto; and (III) to Continue the Insurance Premium Financing Program;
- Exhibit E: Final Order (I) Authorizing Payment of Certain Prepetition Taxes and Fees and (II) Authorizing Financial Institutions to Process and Cash Related Checks and Transfers;
- Exhibit F: Final order (I) Prohibiting Utility Providers from Altering, Refusing or Discontinuing Services, (II) Deeming Utility Providers Adequately Assured of Payment, (III) Establishing Procedures for Determining Additional Adequate Assurance of Payment, and (IV) Granting Related Relief; and
- Exhibit G: Final Order (A) Authorizing the Debtors to Pay and Honor Certain Prepetition Wages, Benefits and Other Compensation Obligations and (B) Authorizing Financial Institutions to Honor and Process Checks and Transfers Related to Such Obligations.

RESPECTFULLY SUBMITTED this 5th day of December, 2018.

McNAIR LAW FIRM, P.A.

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