

**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)

**SECOND SUPPLEMENTAL DECLARATION OF JOHN SORDILLO IN
SUPPORT OF DEBTORS' APPLICATION FOR ENTRY OF ORDER
PURSUANT TO 11 U.S.C. §§ 105(a) AND 363(b) AUTHORIZING
AND APPROVING DEBTORS' (I) RETENTION AND EMPLOYMENT OF
LOUGHLIN MANAGEMENT PARTNERS & CO., INC.
AND (II) EMPLOYMENT OF JOHN SORDILLO AS
CHIEF RESTRUCTURING OFFICER
NUNC PRO TUNC TO THE PETITION DATE**

1. I am a Managing Director of Loughlin Management Partners & Co., Inc. ("**Loughlin**"), a financial and operational advisory firm which has its principal office at 20 West 55th Street, 5th Floor, New York, New York 10019. I am submitting this second supplemental declaration (the "**Second Supplemental Declaration**") to the Debtors' *Application for Entry of Order Pursuant to 11 U.S.C. §§ 105(a) and 363(b) Authorizing and Approving Debtors' (I) Retention and Employment of Loughlin Management Partners & Co., Inc. and (II) Employment of John Sordillo as Chief Restructuring Officer Nunc Pro Tunc to the Petition Date* (the "**Application**"). I am authorized to make this supplement on behalf of Loughlin. Except as otherwise noted,² I have personal knowledge of the matters set forth herein. Unless otherwise

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.

² Certain of the disclosures herein relate to matters within the personal knowledge of other professionals at Loughlin and are based on information provided by them.

defined, capitalized terms used but not defined herein shall have the meanings ascribed to them in the Application.

2. On December 4, 2018, the Debtors filed the Application. Along with the filing of the Application, the Debtors filed the *Declaration of John Sordillo in Support of the Application* (the “**Original Declaration**”).

3. On December 18, 2018, the Debtors filed my *Supplemental Declaration of John Sordillo in Support of the Application* (the “**Supplemental Declaration**”).

4. The Supplemental Declaration referenced Exhibit A, which was a list of additional parties-in-interest which Loughlin processed through its client database for our representation in these cases. Exhibit A was inadvertently omitted from the Supplemental Declaration. A copy of Exhibit A is attached hereto. The sole purpose of this Second Supplemental Declaration is to provide Exhibit A.

Conclusion

5. Loughlin recognizes its continuing responsibility to be aware of, and to further disclose, any relationship or connection between it and other parties-in-interest to the Debtors’ bankruptcy estates and the Chapter 11 cases as they appear or become recognized during the Chapter 11 cases. Accordingly, Loughlin reserves the right to supplement this supplemental disclosure if necessary as more information becomes available.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge and belief.

Dated: December 19, 2018



John Sordillo
Managing Director
Loughlin Management Partners & Co., Inc.

EXHIBIT "A"

Additional Conflict Parties

Top 30 Unsecured Creditors:

7420 Broad River Road LLC
B&T Sand Company
Beetle Enterprises
Carolina Child Care Properties
Center Hills, LLC
Duke Power
Fishbowl, Inc.
Freshpoint
Gary & Margaret Smith
Geoffrey Stuchman
Hamilton Chase-Citadel, LLC
Henderson Crossing
Infinity Marketing Solutions, Inc.
Koury Corp
M&R Investors
MRB, LLC
NCR Corporation
Old Mill Stream
Pepper Hamilton LLP
PP Gaston Mall
Restaurant Technologies, Inc.
Robinson, Bradshaw & Hinson
Store Master Funding I, LLC
Store Master Funding V, LLC
SYSCO
SYSCO-Charlotte
Thrift Brothers
Tryon Sisson
Valassis Digital
Winds Crossing
Spendifference aka SD Holdings

Officers and Directors:

James Billmyer
Bob Bloom
William Burton
Tony Clark
Brian Dukes
Eric Easton
Brian Harrington

Carl Lane
Bob Levine
Jim Mazany
Jane Melvin
Holly Smith
W. Scott Warren

Equity Holders:

Brian Harrington
Chuck Faust
David and Suzanne Hadley Family Trust dated 12/18/1999
Eric Holman
Fred Grant
Gerald Johnson
Jane Melvin
Jim Balis
Larry Zwain
Linda Kiehl
Lynne Burton
Madison Capital Funding LLC
Milestone Partners III, L.P.
Milestone Partners III, L.P. 2
Pedro Garcia
Richie Cannon
Sara Anderson
Steve Bruce
Steve Corson
Tabitha Sprouse
Tony Wright