

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	
	)	Chapter 11
CRED INC., <i>et al.</i> ,	)	
	)	Case No. 20-12836 (JTD)
Debtors. <sup>1</sup>	)	(Jointly Administered)
	)	
	)	

**NOTICE OF: (I) INTERIM APPROVAL OF DISCLOSURE STATEMENT; (II) ESTABLISHMENT OF  
VOTING RECORD DATE; (III) PROCEDURES AND DEADLINE FOR VOTING ON PLAN; AND  
(IV) HEARING ON FINAL APPROVAL OF DISCLOSURE STATEMENT AND CONFIRMATION OF  
PLAN AND RELATED PROCEDURES FOR OBJECTIONS**

**PLEASE TAKE NOTICE THAT:**

- Interim Approval of Disclosure Statement.** On January 21, 2021, the Bankruptcy Court entered an Order (the “Disclosure Statement Order”) approving, on an interim basis the Disclosure Statement as set forth in the *First Amended Combined Joint Plan of Liquidation and Disclosure Statement of Cred Inc. and its Subsidiaries Under Chapter 11 of the Bankruptcy Code* (with respect to its component parts, as modified, amended, or supplemented from time to time, the “Plan” and the “Disclosure Statement”, or, collectively the “Combined Joint Plan and Disclosure Statement”). The Disclosure Statement Order authorizes the Debtors to solicit votes to accept or reject the Plan.
- Combined Hearing.** The combined hearing (the “Combined Hearing”) to consider final approval of the Disclosure Statement and confirmation of the Plan shall be held on **March 9, 2021, at 2:00 p.m. (prevailing Eastern Time)** before the Honorable John T. Dorsey, United States Bankruptcy Judge, of the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Wilmington, Delaware 19801. The Combined Hearing may be continued from time to time without further notice other than the announcement by the Debtors in open court of the adjourned date(s) at the Combined Hearing or any continued hearing. The Debtors may modify the Plan, if necessary, prior to, during, or as a result of the Combined Hearing in accordance with the terms of the Plan without further notice. **NOTE: Due to the COVID-19 crisis, the Combined Hearing may be conducted remotely. Please refer to the Bankruptcy Court’s website for further instructions at <https://www.deb.uscourts.gov>.**
- Record Date for Voting Purposes.** Holders of claims in Class 4 (General Unsecured Claims) and Class 5 (Convenience Claims) on **January 14, 2021** (the “Voting Record Date”) are entitled to vote on the Plan.
- Voting Procedures.** If you are entitled to vote you will receive a solicitation package which shall include a copy of (a) the Disclosure Statement Order, (b) this Notice, (c) the Combined Joint Plan and Disclosure Statement, and (d) a ballot (the “Ballot”). Please review the Ballot of specific instructions as to how to vote. If you disagree with the amount listed on your ballot, you may contact Debtors’ counsel to attempt to try and resolve the matter. In the event you are unable to reach agreement with the Debtors on the allowed amount of its claim for voting purposes, you may file with the Court a motion (a “Rule 3018(a) Motion”) for an order pursuant to Rule 3018(a) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) temporarily allowing your claim in a different amount. Failure to follow the voting instructions may disqualify your vote.

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each debtor’s tax identification number, as applicable, are as follows: Cred Inc. (8268), Cred (US) LLC (5799), Cred Capital Inc. (4064), Cred Merchant Solutions LLC (3150), and Cred (Puerto Rico) LLC (3566). The Debtors’ mailing address is 3 East Third Avenue, Suite 200, San Mateo, California 94401.

5. **Voting Deadline.** The deadline to vote on the Plan is **4:00 p.m. (prevailing Eastern Time) on March 1, 2021** (the “Voting Deadline”). The Debtors’ voting agent, Donlin Recano & Company, Inc. (the “Voting Agent”), must receive your ballot by the Voting Deadline otherwise your vote will not be counted.
6. **Parties in Interest Not Entitled to Vote.** Holders of claims in Class 1 (Other Priority Claims), Class 2 (Secured Tax Claims), Class 3 (Other Secured Claims), Class 6 (Subordinated Securities Claims), and Class 7 (Equity Interests in Debtors) are not entitled to vote on the Plan. Such holders will receive an appropriate Notice of Non-Voting Status instead of a Ballot. If you have timely filed a proof of claim and disagree with the Debtors’ classification of, objection to, or request for estimation of, your claim and believe that you should be entitled to vote on the Plan, you may contact Debtors’ counsel to attempt to try and resolve the matter. In the event you are unable to reach agreement with the Debtors on the allowed amount of its claim for voting purposes, you may file with the Court a Rule 3018 Motion for an order pursuant temporarily allowing your claim for purposes of voting to accept or reject the Plan. All Rule 3018(a) Motions must be filed on or before the 7th calendar day before the Voting Deadline. As to any creditor filing a Rule 3018(a) Motion, such creditor’s Ballot will not be counted except as may be otherwise ordered by the Court. Creditors may contact Donlin Recano & Company at (877) 739-9988 (or outside of the U.S. at (212) 771-1128) to receive an appropriate Ballot for any claim for which a proof of claim has been timely filed and a Rule 3018(a) Motion has been granted. Rule 3018(a) Motions that are not timely filed and served in the manner set forth above shall not be considered.
7. **Objections to Final Approval of Disclosure Statement or Plan Confirmation.** Objections or responses to final approval of the Disclosure Statement or confirmation of the Plan, if any, must (i) be in writing, (ii) state the name and address of the objecting party and the amount and nature of the claim or interest of such party, (iii) state with particularity the basis and nature of any objection or proposed modification to the Disclosure Statement or Plan, and (iv) be filed, together with proof of service, with the Court and served upon either the following e-mail or physical addresses so as to be actually received by: (a) counsel for the Debtors, (i) Paul Hastings LLP, 600 Travis Street, 58th Floor, Houston, Texas 77002, Attn: James T. Grogan (jamesgrogan@paulhastings.com) and Mack Wilson (mackwilson@paulhastings.com), (ii) Paul Hastings LLP, 200 Park Avenue, New York, New York, 10166, Attn: G. Alexander Bongartz (alexbongartz@paulhastings.com), Scott Shelley (scottshelley@paulhastings.com), and Derek Cash (derekcash@paulhastings.com), and (iii) Cousins Law LLC, Brandywine Plaza West, 1521 Concord Pike, Suite 301, Wilmington, Delaware 19803, Attn: Scott D. Cousins (scott.cousins@cousinslaw.com); (b) counsel for the Creditors’ Committee, McDermott Will & Emery LLP, 340 Madison Avenue, New York, New York 10173, Attn: Timothy W. Walsh (twwalsh@mwe.com) and Darren Azman (dazman@mwe.com); and (c) the U.S. Trustee, 844 King Street, Suite 2207, Wilmington, Delaware 19801, Attn: Joseph J. McMahon, Jr. (joseph.mcmahon@usdoj.gov) and John Schanne (john.schanne@usdoj.gov), so as to be actually received no later than **4:00 p.m. (prevailing Eastern Time), on March 1, 2021**. Failure to file and serve any objection to final approval of the Disclosure Statement or confirmation of the Plan in conformity with the foregoing procedures may result in the objecting party not being heard at the hearing.
8. **Additional Information.** For more information about the solicitation procedures, or for copies of the Combined Joint Plan and Disclosure Statement, parties should contact the Debtors’ Voting Agent, Donlin Recano & Company, Inc., at (877) 739-9988 (or outside of the U.S. at (212) 771-1128). The Combined Joint Plan and Disclosure Statement and related documents may be examined free of charge at <https://donlinrecano.com/clients/cred/Index>. The Combined Joint Plan and Disclosure Statement are also on file with the Court and may be viewed by accessing the Court’s website at [www.deb.uscourts.gov](http://www.deb.uscourts.gov). To access documents on the Court’s website, you will need a PACER password and login, which you can be obtained at [www.pacer.psc.uscourts.gov](http://www.pacer.psc.uscourts.gov).

Dated: January 22, 2021  
Wilmington, Delaware

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