

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

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In re: : Chapter 11
:
EHT US1, Inc., *et al.*, : Case No. 21-10036 (CSS)
:
Debtors.¹ :
----- x (Jointly Administered)

**NOTICE OF AGENDA OF MATTER SCHEDULED
FOR HEARING ON DECEMBER 20, 2021 AT 9:00 A.M. (ET)
BEFORE THE HONORABLE CHRISTOPHER S. SONTCHI²**

**THIS HEARING WILL BE HELD BY VIDEO VIA ZOOM. BOTH VIDEO AND AUDIO
WILL BE THROUGH ZOOM. ALL PARTIES APPEARING REMOTELY MUST
REGISTER THEIR ZOOM APPEARANCE AT LEAST 1 HOUR BEFORE THE START
OF THE HEARING.**

Registration link:

<https://debuscourts.zoomgov.com/meeting/register/vJIsdeGhqjwGDVL7siL6AVIk94BXjKDVag>

**YOU MUST USE YOUR FULL NAME WHEN LOGGING INTO ZOOM OR YOU WILL
NOT BE ALLOWED INTO THE MEETING.**

MATTER GOING FORWARD

1. First Amended Joint Plan of Liquidation of Eagle Hospitality Real Estate Investment Trust and Certain of Its Subsidiary Debtors Under Chapter 11 of the Bankruptcy Code [Fully Executed] (Filed November 8, 2021) (Docket No. 1598)

Related Pleadings:

- (a) Joint Plan of Liquidation of Eagle Hospitality Real Estate Investment Trust and Certain of Its Subsidiary Debtors Under Chapter 11 of the Bankruptcy Code (Filed October 14, 2021) (Docket No. 1351)

¹ 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: EHT US1, Inc.(6703); 5151 Wiley Post Way, Salt Lake City, LLC (1455); ASAP Cayman Atlanta Hotel LLC (2088); ASAP Cayman Denver Tech LLC (7531); ASAP Cayman Salt Lake City Hotel LLC (7546); ASAP Salt Lake City Hotel, LLC (7146); Atlanta Hotel Holdings, LLC (6450); CI Hospitality Investment, LLC (7641); Eagle Hospitality Real Estate Investment Trust (7734); Eagle Hospitality Trust S1 Pte. Ltd. (7669); Eagle Hospitality Trust S2 Pte. Ltd. (7657); EHT Cayman Corp. Ltd. (7656); Sky Harbor Atlanta Northeast, LLC (6846); Sky Harbor Denver Holdco, LLC (6650); Sky Harbor Denver Tech Center, LLC (8303); UCCONT1, LLC (0463); UCF 1, LLC (6406); UCRDH, LLC (2279); UCHIDH, LLC (6497); Urban Commons 4th Street A, LLC (1768); Urban Commons Anaheim HI, LLC (9915); Urban Commons Bayshore A, LLC (2422); Urban Commons Cordova A, LLC (4152); Urban Commons Danbury A, LLC (4388); Urban Commons Highway 111 A, LLC (4497); Urban Commons Queensway, LLC (6882); Urban Commons Riverside Blvd., A, LLC (4661); and USHIL Holdco Member, LLC (4796). The Debtors' mailing address is 1166 Avenue of the Americas, 15th Floor, New York, NY 10036 c/o Alan Tantleff (solely for purposes of notices and communications).

² Unless otherwise directed by the Court, all examination of witnesses other than by proffer or declaration shall occur in-person in the courtroom in accordance with the instructions set forth in the Revised Chambers Procedures Regarding Hearings Before the Hon. Christopher S. Sontchi (Effective for all hearings on and after November 1, 2021).

- (b) Disclosure Statement for Joint Plan of Liquidation of Eagle Hospitality Real Estate Investment Trust and Certain of Its Subsidiary Debtors Under Chapter 11 of the Bankruptcy Code (Filed October 14, 2021) (Docket No. 1352)
- (c) First Amended Joint Plan of Liquidation of Eagle Hospitality Real Estate Investment Trust and Certain of Its Subsidiary Debtors Under Chapter 11 of the Bankruptcy Code (Filed November 1, 2021) (Docket No. 1525)
- (d) Notice of Filing of Blackline Version of First Amended Joint Plan of Liquidation (Filed November 1, 2021) (Docket No. 1526)
- (e) Disclosure Statement for First Amended Joint Plan of Liquidation of Eagle Hospitality Real Estate Investment Trust and Certain of Its Subsidiary Debtors Under Chapter 11 of the Bankruptcy Code (Filed November 1, 2021) (Docket No. 1528)
- (f) Order: (I) Approving Disclosure Statement; (II) Establishing Voting Record Date; (III) Approving Solicitation Packages and Distribution Procedures; (IV) Approving Forms of Ballots and Establishing Procedures for Voting on First Amended Joint Plan of Liquidation of Eagle Hospitality Real Estate Investment Trust and Certain of Its Subsidiary Debtors Under Chapter 11 of Bankruptcy Code; (V) Approving Forms of Notices to Non-Voting Classes Under Plan; (VI) Establishing Voting Deadline to Accept or Reject Plan; (VII) Approving Procedures for Vote Tabulations; and (VIII) Establishing Hearing Date for Confirmation of Joint Plan and Related Notice and Objection Procedures (Entered November 4, 2021) (Docket No. 1583)
- (g) Disclosure Statement for First Amended Joint Plan of Liquidation of Eagle Hospitality Real Estate Investment Trust and Certain of Its Subsidiary Debtors Under Chapter 11 of the Bankruptcy Code [Solicitation Version] (Filed November 8, 2021) (Docket No. 1597)
- (h) Plan Supplement (Filed November 29, 2021) (Docket No. 1718)
- (i) Affidavit of Adam B. Levin Regarding Publication of Confirmation Hearing Notice) (*Hotel Business*) (Filed November 29, 2021) (Docket No. 1725)
- (j) Affidavit of Publication of Notice of: (I) Approval of Disclosure Statement; (II) Establishment of Voting Record Date; (III) Procedures and Deadline for Voting on Plans; and (IV) Hearing on Confirmation of Plans and Related Procedures for Objections) (*Los Angeles Times*) (Filed November 29, 2021) (Docket No. 1726)
- (k) Affidavit of Adam B. Levin Regarding Publication of Confirmation Hearing Notice) (*The Straits Times*) (Filed November 29, 2021) (Docket No. 1727)

- (l) Affidavit of Publication of Notice of: (I) Approval of Disclosure Statement; (II) Establishment of Voting Record Date; (III) Procedures and Deadline for Voting on Plans; and (IV) Hearing on Confirmation of Plans and Related Procedures for Objections) (*USA Today*) (Filed November 29, 2021) (Docket No. 1728)
- (m) Notice of Filing Revised Exhibit A to Plan Supplement (Filed December 9, 2021) (Docket No. 1819)
- (n) Liquidating Debtors' Memorandum of Law (I) In Support of Confirmation of First Amended Joint Plan of Liquidation of Eagle Hospitality Real Estate Investment Trust and Certain of Its Subsidiary Debtors and (II) in Response to Objections to Confirmation of Plan (Filed December 15, 2021) (Docket No. 1840)
- (o) Liquidating Debtors' Motion for Entry of an Order Authorizing the Liquidating Debtors to Exceed the Page Limit Requirement With Respect to the Liquidating Debtors' Confirmation Brief (Filed December 15, 2021) (Docket No. 1842)
- (p) Declaration of Alan Tantleff in Support of Confirmation of First Amended Joint Plan of Liquidation of Eagle Hospitality Real Estate Investment Trust and Certain of Its Subsidiary Debtors (Filed December 15, 2021) (Docket No. 1843)
- (q) Declaration of David Mack in Support of Confirmation of First Amended Joint Plan of Liquidation of Eagle Hospitality Real Estate Investment Trust and Certain of Its Subsidiary Debtors (Filed December 15, 2021) (Docket No. 1844)
- (r) Declaration of John Burlacu of Donlin, Recano & Company, Inc. Regarding Solicitation and Tabulation of Votes Cast on First Amended Joint Plan of Liquidation of Eagle Hospitality Real Estate Investment Trust and Certain of Its Subsidiary Debtors Under Chapter 11 of the Bankruptcy Code (Filed December 15, 2021) (Docket No. 1846)
- (s) Notice of Filing Modified First Amended Joint Plan of Liquidation of Eagle Hospitality Real Estate Investment Trust and Certain of Its Subsidiary Debtors Under Chapter 11 of the Bankruptcy Code (Filed December 16, 2021) (Docket No. 1851)

Objection Deadline: December 9, 2021 at 4:00 p.m. (ET)

On consent of the parties, the Objection Deadline was extended until 4:00 p.m. (ET) on December 13, 2021 for County of Santa Clara Department of Tax and Collections, and until 10:00 a.m. (ET) on December 15, 2021 for the United States, on behalf of its Internal Revenue Service and the U.S. Small Business Administration.

Responses Received:

- (a) United States Trustee's Objection to Motion of Debtors for an Order Approving the Adequacy of the Disclosures in the Combined Disclosure Statement and Plan on an Interim Basis; (II) Scheduling the Confirmation Hearing and Deadline for Filing Objections; (iii) Establishing Procedures for the Solicitation and Tabulation of Votes to Accept or Reject the Combined Disclosure Statement and Plan; (IV) Approving the Form of Ballot and Solicitation Packages; and (V) Approving Related Relief (D.I. 1352, 1354) (Filed October 29, 2021) (Docket No. 1499)
- (b) Statement Regarding the United States Trustee's Objection to the First Amended Joint Plan of Liquidation of Eagle Hospitality Real Estate Investment Trust and Certain of Its Subsidiary Debtors Under Chapter 11 of the Bankruptcy Code (D.I. 1499, 1525 and 1598) (Filed December 8, 2021) (Docket No. 1814)
- (c) Howard Wu, Taylor Woods, and EHT Asset Management LLC, et.al., Objection to the Chapter 11 Plan (Filed December 9, 2021) (Docket No. 1818)
- (d) Objection by the United States to the First Amended Joint Plan of Liquidation (Filed December 15, 2021) (Docket No. 1836)
- (e) Statement of the Official Committee of Unsecured Creditors in Support of Confirmation of the First Amended Joint Plan of Liquidation of Eagle Hospitality Real Estate Investment Trust and Certain of Its Subsidiary Debtors Under Chapter 11 of the Bankruptcy Code (Filed December 15, 2021) (Docket No. 1841)

Status: This matter is going forward.

Witness information: The Debtors intend to offer the direct testimony of (i) Alan Tantleff, Chief Restructuring Officer to the Debtors, (ii) David Mack, Independent Director of certain of the Debtors, and (iii) John Burlacu of Donlin, Recano & Company, Inc. via their filed declarations. The Debtors may also supplement the declaration testimony with a proffer.

Dated: December 16, 2021
Wilmington, Delaware

COLE SCHOTZ P.C.

/s/ G. David Dean

Seth Van Aalten (admitted *pro hac vice*)

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- and -

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