

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

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In re:	:	Chapter 11
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EHT US1, Inc., <i>et al.</i> ,	:	Case No. 21-10036 (CSS)
	:	
Debtors. ¹	:	(Jointly Administered)
	:	Re: Docket No. 1352
	x	

NOTICE OF HEARING TO CONSIDER APPROVAL OF 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

PLEASE TAKE NOTICE THAT:

1. On October 14, 2021, Eagle Hospitality Real Estate Investment Trust (“EH REIT”) and its affiliated debtors, as debtors in possession other than Urban Commons Queensway, LLC (the “Liquidating Debtors”) filed the *Joint Plan of Liquidation of Eagle Hospitality Real Estate Investment Trust and Certain of Its Subsidiary Debtors Under Chapter 11 of the Bankruptcy Code* (each plan of a Liquidating Debtor, a “Plan” and, collectively, the “Plans”) and the *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* (the “Disclosure Statement”). The proponents of the Plans are the Liquidating Debtors, the official committee of unsecured creditors appointed in the Chapter 11 Cases, and Bank of America, N.A., in its capacities as administrative agent and U.S. funding agent under the Prepetition Credit Agreement.
2. A hearing will be held before the Honorable Christopher S. Sontchi, United States Bankruptcy Judge, of the United States Bankruptcy Court for the District of Delaware (the “Court”), Fifth Floor, Courtroom #6, 824 North Market Street, Wilmington, Delaware 19801, on **November 4, 2021 at 12:00 p.m. (prevailing Eastern Time)** (the “Hearing”) to consider the entry of an order, among other things, determining that the Disclosure Statement contains “adequate information” within the meaning ascribed to such term in section 1125 of the Bankruptcy Code and approving the Disclosure Statement. **NOTE: Due to the COVID-19 crisis, the Hearing may be conducted remotely. Please refer to the Bankruptcy Court’s website for further instructions at <https://www.deb.uscourts.gov>.**
3. Any party in interest wishing to obtain a copy of the Disclosure Statement and the Plans should contact the Liquidating Debtors’ Voting Agent, Donlin Recano & Company, Inc., at (800) 416-3743 (or outside of the U.S. at (212) 771-1128). The Disclosure Statement and the Plans may be examined free of charge at <https://donlinrecano.com/clients/eagle/Index>. The Disclosure Statement and the Plans are also on file with the Court and may be viewed by accessing the Court’s website at 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.

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 3 Times Square, 9th Floor New York, NY 10036 c/o Alan Tantleff (solely for purposes of notices and communications).

4. Objections, if any, to approval of the Disclosure Statement must: (a) be in writing; (b) be in the English language; (c) state the name and address of the objecting party and the amount and nature of the claim or interest of such party; (d) state with particularity the basis and nature of any objection to the Disclosure Statement; and (e) be filed, together with proof of service, with the Court and served so that they are actually received by the following parties on or before **October 28, 2021, at 4:00 p.m. (prevailing Eastern Time) (the "Objection Deadline")**: (a) counsel for the Debtors, (i) Cole Schotz P.C. 500 Delaware Avenue, Suite 1410, Wilmington, DE 19801, Attn: Seth Van Aalten, G. David Dean and Justin R. Alberto and (ii) Paul Hastings LLP, 200 Park Avenue, New York, NY 10166, Attn: Luc A. Despins, Esq. and G. Alexander Bongartz, Esq., (b) counsel for the Committee, (i) Morris James LLP, 500 Delaware Avenue, Suite 1500, Wilmington, DE 19801, Attn: Jeffrey R. Waxman, Eric J. Monzo and Brya M. Keilson, and (ii) Kramer Levin Naftalis & Frankel LLP, 1177 Avenue of the America, New York, NY 10036, Attn: Adam C. Rogoff, Robert T. Schmidt, and Douglas Buckley; (c) counsel for the Prepetition Agent, (i) Morgan, Lewis & Bockius LLP, 101 Park Avenue, New York, NY 10178-0060, Attn: Jennifer Feldsher, (ii) Morgan, Lewis & Bockius LLP, One Federal Street, Boston, MA 02110, Attn: Jonathan K. Bernstein and Christopher L. Carter, and (iii) Richards, Layton & Finger, P.A. One Rodney Square 920 North King Street, Wilmington, DE 19801, Attn: Mark D. Collins and Brendan J. Schlauch; and (d) the Office of the United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 1980, Attn: Richard L. Schepacarter).
5. **IF AN OBJECTION TO THE DISCLOSURE STATEMENT IS NOT FILED AND SERVED AS PRESCRIBED HEREIN, THE OBJECTING PARTY MAY BE BARRED FROM OBJECTING TO THE DISCLOSURE STATEMENT OR THE ADEQUACY THEREOF AND MAY NOT BE HEARD AT THE HEARING.**
6. Upon approval of the Disclosure Statement by the Court, any party in interest that is entitled to vote on the Plan will receive a copy of the Disclosure Statement, the Plans, and various documents related thereto, unless otherwise ordered by the Court.
7. The Hearing may be adjourned from time to time without further notice to parties in interest other than by an announcement in Court of such adjournment on the date scheduled for the Hearing or as indicated in any notice of agenda of matters scheduled for hearing filed by the Debtors with the Court.

**NOTICE TO HOLDERS OF CLAIMS AGAINST THE LIQUIDATING DEBTORS AND
HOLDERS OF EQUITY INTERESTS IN EH REIT**

If you are an equityholder (also referred to as a unitholder) of EH REIT or a holder of general unsecured claims against any of the Liquidating Debtors, please also note the following:

- ❖ At this time, the proposed Disclosure Statement has not been approved by the Court, and accordingly, the Liquidating Debtors are not soliciting the votes of any creditors or equityholders at this time.
- ❖ If the Disclosure Statement is approved by the Court, the Liquidating Debtors will not solicit the votes of holders of equity interests (or units) in EH REIT, as under the proposed Plan of EH REIT the class of such equityholders would be deemed to have rejected the Plan of EH REIT.
- ❖ Similarly, if the Disclosure Statement is approved by the Court, the Liquidating Debtors will not solicit the votes of holders of general unsecured claims against EH REIT (Class 9 in the EH REIT Plan) and holders of claims against EH REIT that are subject to subordination under section 510(b) of the Bankruptcy Code (Class 13 in the EH REIT Plan). Under the proposed Plan of EH REIT, these classes would also be deemed to have rejected the Plan of EH REIT.
- ❖ Once the Disclosure Statement has been approved, you will receive a separate notice setting forth the confirmation process, including the date of the hearing on confirmation of the Plans and the deadline to object to the Plans.

Dated: October 14, 2021
Wilmington, Delaware

/s/ G. David Dean

Seth Van Aalten (admitted *pro hac vice*)

G. David Dean

COLE SCHOTZ P.C.

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