

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MINNESOTA**

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In re:

Gander Mountain Company,  
  
Debtor.

Case No.: 17-30673  
Chapter 11 Case

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In re:

Overton's, Inc.,  
  
Debtor.

Case No.: 17-30673  
Chapter 11 Case

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**NOTICE OF INTENTION TO SEEK EXPEDITED HEARING**

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Gander Mountain Company and Overton's Inc. ("Debtors") gives notice that it intends to seek expedited hearings on the following matters:

- (1) Notice of Hearing and Motion for Order Granting Expedited Relief and Authorizing Joint Administration of Cases;
- (2) Notice of Hearing and Joint Motion for an Order (I) Granting an Expedited Hearing, (II) Authorizing Maintenance of the Debtors' Cash Management System, Bank Accounts and Check Stock;
- (3) Notice of Hearing and Joint Motion for Expedited Relief and for Interim and Final Orders Authorizing the Debtors to Pay the Prepetition Amounts Relating to Certain Critical Vendors;
- (4) Notice of Hearing and Joint Motion for an Entry of an Order (I) Granting Expedited Relief and (II) Authorizing the Debtors to Honor and Continue Certain Customer Programs and Customer Obligations in the Ordinary Course of Business;
- (5) Notice of Hearing and Motion for Order (I) Granting Expedited Relief, (II) Authorizing Debtors to Pay Prepetition Employee Compensation, Benefits, Workers' Compensation Obligations, and Other Related Amounts, and (III) Authorizing Payroll Provider and Financial Institutions to Honor and Process Checks and Transfers Related to Such Relief;

- (6) Notice of Hearing and Motion for Order (I) Granting Expedited Relief, (II) Authorizing Debtors to Pay Prepetition Amounts Relating to Certain Shippers, Warehousemen, and Custom Duties, and (III) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers;
- (7) Notice of Hearing and Motion for an Order (I) Granting Expedited Relief, (II) Authorizing Debtors to Pay Certain Prepetition Taxes and Fees and (III) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers;
- (8) Notice of Hearing and Motion for Order Granting Expedited Relief and Establishing Procedures Regarding Adequate Assurance of Future Performance for Utilities;
- (9) Notice of Hearing and Motion for Order (I) Granting an Expedited Hearing, and (II) Establishing Procedures for the Resolution of Reclamation Claims and Administrative Claims Pursuant to Section 503(b)(9) of the Bankruptcy Code.
- (10) Notice of Hearing and Motion for an Order Authorizing Debtors to Obtain Post-Petition Secured Financing, (II) Granting Liens and Superpriority Claims to Post-Petition Lenders, (III) Authorizing the Use of Cash Collateral and Providing Adequate Protection to Prepetition Secured Parties and Modifying the Automatic Stay, and (IV) Scheduling a Final Hearing;
- (11) Notice of Hearing and Joint Motion for Order (I) Granting Expedited Relief and (II) Approving Key Employee Retention Plan and Key Employee Incentive Plan;
- (12) Notice of Hearing and Joint Motion for Expedited Relief and an Order Approving the Debtors' Proposed Notice Procedures for Employees, Enrollees in the Gander Mountain Rewards Program and Gift Card Holders;
- (13) Notice of Hearing and Joint Motion for (I) Expedited Relief and (II) Order Authorizing the Debtors to File Certain Documents Under Seal; and
- (14) Notice of Motion and Motion for an Interim and Final Order (I) Authorizing the Debtors to Assume the Store Closing Agreement with Liquidation Consultant, (II) Approving the Debtors' Store Closing Plan, (III) Authorizing and Approving Store Closing Sales Free and Clear of All Liens, Claims and Encumbrances, (IV) Exempting the Debtors from Complying with Non-Bankruptcy Liquidation Law, (V) Exempting the Debtors from Complying with Any Contractual Restrictions Places Upon the Liquidation/Closing Sales; and (VI) Permitting the Debtors to Abandon any Property that is Burdensome or of Inconsequential Value

Dated: March 10, 2017

*Clinton E. Cutler*

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Clinton E. Cutler (#0158094)  
Cynthia A. Moyer (#0211229)  
Ryan T. Murphy (#0311972)  
James C. Brand (#387362)  
Sarah M. Olson (#0390238)  
Steven R. Kinsella (#0392289)  
**FREDRIKSON & BYRON, P.A.**  
200 South Sixth Street, Suite 4000  
Minneapolis, MN 55402-1425  
Telephone: 612.492.7000  
ccutler@fredlaw.com  
cmoyer@fredlaw.com  
rmurphy@fredlaw.com  
jbrand@fredlaw.com  
solson@fredlaw.com  
skinsella@fredlaw.com

**PROPOSED ATTORNEYS FOR DEBTORS**

60915442.1