

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

In re:

Gander Mountain Company,

Debtor.

Case No.: 17-30673
Chapter 11 Case

In re:

Overton's, Inc.,

Debtor.

Case No.: 17-30675
Chapter 11 Case

**AMENDED NOTICE OF HEARING AND
INTENTION TO SEEK EXPEDITED HEARING**

Gander Mountain Company and Overton's, Inc. (the "Debtors") file this amended notice to: (i) provide an update regarding the location of the first hearing in the case, which is scheduled for 1:30 p.m. on March 14, 2017 (the "Initial Hearing"); and (ii) correct and clarify their originally-filed Notice of Intention to Seek Expedited Hearing [dkt. nos. 37 and 30, respectively] (the "Original Notice"). Specifically, the Debtors have been informed that the Initial Hearing will now be held in Courtroom 7 West, U.S. Courthouse, 300 South Fourth Street, Minneapolis, Minnesota, with the Honorable Michael E. Ridgway presiding. In addition, the Original Notice listed the Debtors' Notice of Hearing and Joint Motion for Order (I) Granting Expedited Relief and (II) Approving Key Employee Retention Plan and Key Employee Incentive Plan. That motion, though expedited, is not set to be heard at the Initial Hearing. Therefore, this amended notice removes that motion from the list. This amended notice also corrects certain inadvertent errors in the motion titles identified in the Original Notice, and lists the motions in a different

sequence. For the avoidance of doubt, this notice does not add any matters that were not listed on the Original Notice. Accordingly, the Debtors give notice that they intend to seek a hearing on the following matters at the Initial Hearing:

- (1) Notice of Hearing and Motion for Order Granting Expedited Relief and Authorizing Joint Administration of Cases;
- (2) Debtors' Motion for Interim and Final Orders (I) Granting Expedited Relief; (II) Approving Postpetition Financing, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Authorizing Use of Cash Collateral, (V) Granting Adequate Protection, (VI) Modifying Automatic Stay, and (VII) Granting Related Relief;
- (3) Notice of Motion and Motion for an Interim and Final Order: (I) Authorizing the Debtors to Enter Into 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 Placed Upon the Closing Sales; and (VI) Permitting the Debtors to Abandon any Property that is Burdensome or of Inconsequential Value;
- (4) 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;
- (5) Notice of Hearing and 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;
- (6) Notice of Hearing and Motion for Order Granting Expedited Relief and Establishing Procedures Regarding Adequate Assurance of Future Performance for Utilities;
- (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 (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;

- (9) Notice of Hearing and Motion for Expedited Relief and for Order Authorizing the Debtors to Pay the Prepetition Amounts Relating to Certain Critical Vendors;
- (10) Notice of Hearing and Motion for Expedited Relief and an Order Authorizing Maintenance of the Debtors' Existing Cash Management System, Bank Accounts and Check Stock;
- (11) 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;
- (12) 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;
- (13) Notice of Hearing and Joint Motion for (I) Expedited Relief and (II) Order Authorizing the Debtors to File Certain Documents Under Seal.

Dated: March 13, 2017

Clinton E. Cutler

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

60949837