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

In re:

GUMP'S HOLDINGS, LLC

☐ Affects this Debtor.

☒ Affects all Debtors.

☐ Affects Gump's Corp.

☐ Affects Gump's By Mail, Inc.

Case No.: BK-18-14683-mkn
Chapter 11

Jointly administered with:

No. BK-18-14684-mkn (In re Gump's Corp.)
No. BK-18-14685-mkn (In re Gump's By Mail, Inc.)

Confirmation Hearing:

Date: April 29, 2021
Time: 1:30 p.m.
Place U.S. Bankruptcy Court District of Nevada
Courtroom 2
Foley Federal Building
300 Las Vegas Boulevard South
Las Vegas, NV 89101

**NOTICE OF: (I) HEARING TO CONSIDER FINAL APPROVAL OF
DISCLOSURE STATEMENT AND CONFIRMATION OF DEBTORS' JOINT
PLAN OF LIQUIDATION; (II) PROCEDURES FOR OBJECTING TO
DISCLOSURE STATEMENT AND CONFIRMATION OF PLAN; AND
(III) PROCEDURES AND DEADLINES FOR VOTING ON THE PLAN**

TO ALL PERSONS AND ENTITIES WITH CLAIMS AGAINST AND EQUITY
SECURITIES IN THE DEBTORS, PLEASE TAKE NOTICE THAT:

1. **Disclosure Statement.** On March 9th 2021, the United States Bankruptcy Court for the District of Nevada (the "Bankruptcy Court") conditionally approved the *Disclosure Statement Concerning The Debtors' Joint Plan of Liquidation (as Revised)* (the "Disclosure Statement"), filed by Gump's Holdings, LLC, Gump's Corp, and Gump's by Mail, Inc. (collectively, "Debtors"). The Bankruptcy Court has directed Debtors to solicit votes with regard to the approval or rejection of *Debtors' Joint Plan of Liquidation (as Revised)*, attached as **Exhibit A** to the Disclosure Statement (as it may be amended, supplemented, or modified,

including all exhibits and schedules annexed thereto or referenced therein, the “Plan”). The Disclosure Statement and *Debtors’ Joint Plan of Liquidation*, attached as **Exhibit A** to the Disclosure Statement may be viewed on the internet at <https://www.donlinrecano.com/Clients/gumps/Index>. If you do not have access to the internet or otherwise require a printed copy of the Disclosure Statement and *Debtors’ Joint Plan of Liquidation*, paper copies of those documents may be requested by contacting Donlin Recano & Company, Inc. at (212) 771-1128.

2. **Confirmation Hearing.** A hearing to consider final approval of the Disclosure Statement and confirmation of the Plan (the “Confirmation Hearing”) will be held before a United States Bankruptcy Judge, in Courtroom 2 of the Foley Federal Building, 300 Las Vegas Boulevard South, Las Vegas, Nevada 89101, commencing on **April 29, 2021 at 1:30 p.m. (Pacific Time)**. The Confirmation Hearing may be conducted telephonically and or by Zoom due to the COVID-19 Crisis as described on the Bankruptcy Court’s electronically posted calendar. The Confirmation Hearing may be continued from time to time without further notice other than the announcement by the Bankruptcy Court or Debtors in open court of the adjourned date at the Confirmation Hearing or any continued hearing, and the Plan may be modified, if necessary, prior to, during, or as a result of the Confirmation Hearing in accordance with the terms of the Plan, without further notice to interested parties. ***Pursuant to LR 3019, all creditors and parties in interest are advised that the Bankruptcy Court may consider modifications to the Plan at the Confirmation Hearing.***

3. **Voting Deadline.** All votes to accept or reject the Plan must be received no later than **April 15, 2021 at 5:00 p.m. (Eastern Time)**. Any failure to follow the voting instructions on the ballots (the “Ballots”) that will be included in the plan packages of holders of claims entitled to vote may disqualify your Ballot and your vote.

4. **Objections to Disclosure Statement and Plan Confirmation.** Pursuant to LR 3017(c), creditors and parties in interest are advised that they may object to the Disclosure Statement, notwithstanding conditional approval of the Disclosure Statement. Any response or objection to the adequacy of the Disclosure Statement and/or confirmation of the Plan (each, an “Objection”), along with briefs and declarations in support of confirmation of the Plan, must: (i) be in writing; (ii) conform to the applicable Bankruptcy Rules and Local Rules, including Local Rule 9014; (iii) be filed with the Bankruptcy Court and served on the Debtors so as to be actually received no later than **April 15, 2021 5:00 p.m. (Pacific Time)**. Replies to such objections and proposed modifications must be served by no later than **April 22, 2021 at 5:00 p.m. (Pacific Time)**.

If you object to the relief requested, you *must* file a **WRITTEN** response to this pleading with the Bankruptcy Court. You *must* also serve your written response on the person who sent you this notice.

If you do not file a written response with the court, or if you do not serve your written response on the person who sent you this notice, then:

- The court may *refuse to allow you to speak* at the scheduled hearing; and
- The court may *rule against you* without formally calling the matter at the hearing.

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5. **Rejection of Executory Contracts and Unexpired Leases.**

(a) **Executory Contracts and Leases Deemed Rejected.** Unless already assumed or rejected by Final Order of the Bankruptcy Court (which may be an order entered in connection with the previously-approved sale of intellectual property assets to GH Acquisitions, LLC), all executory contracts and unexpired leases of the Debtors which are not the subject of a pending application to assume as of the Confirmation Date shall be deemed rejected on the Effective Date.

(b) **Deadlines for Filing Rejection Damages Claims.** Claims for damages arising from the rejection of any executory lease shall be filed as follows:

i. Holders of Claims arising from the rejection of an executory contract or unexpired lease other than by the terms of the Plan, shall follow the procedures previously set forth in such order authorizing rejection for filing a Claim, or such Claim shall be disallowed in its entirety.

ii. Holders of Claims as a result of the rejection of an executory contract or unexpired lease by the terms of the Plan shall file a Proof of Claim for rejection damages thirty (30) days after the Effective Date, or such other date as may be established by the Bankruptcy Court, or such Claim shall be disallowed in its entirety.

6. **Additional Information.** Any party in interest wishing to obtain information about the solicitation procedures or paper copy of the Plan and Disclosure Statement should go to the case website at <https://www.donlinrecano.com/Clients/gumps/Index> or contact **Donlin Recano & Company, Inc.** at (212) 771-1128. Any party in interest wishing to view the Plan and Disclosure Statement may also view such documents by accessing the Bankruptcy Court's Electronic Case Filing System, which can be found at www.nvb.uscourts.gov.

Dated: March 9, 2021

GARMAN TURNER GORDON LLP

By: /s/ William M. Noall

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