

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

In re:

MUJI U.S.A. LIMITED,¹

Reorganized Debtor.

Chapter 11

Case No. 20-11805 (MFW)

**NOTICE OF AMENDMENT TO MUJI U.S.A. LIMITED'S
SCHEDULES (E/F) OF ASSETS AND LIABILITIES**

PLEASE TAKE NOTICE that, pursuant to Rule 1009(a) of the Federal Rules of Bankruptcy Procedure, MUJI U.S.A. Limited (the “Debtor”) has filed an amendment to its Schedules of Assets and Liabilities originally filed on August 14, 2020 [Docket No. 110] (the “Schedules”) with the United States Bankruptcy Court for the District of Delaware (the “Court”). The amendment reflects a **removal** of one scheduled claim previously listed on the Debtor’s Schedules. A copy of the amendment is attached hereto as **Exhibit A**.

PLEASE TAKE FURTHER NOTICE that, on August 19, 2020, the Court entered an order [Docket No. 122] (the “Bar Date Order”) fixing, as more fully set forth therein, a general bar date for the filing of unsecured claims on or before September 22, 2020, at 5:00 p.m. (Prevailing Eastern Time) (the “General Bar Date”).

PLEASE TAKE FURTHER NOTICE that, pursuant to the Bar Date Order, if the Debtor amends or supplements its Schedules after service of the Bar Date Notice (as defined in the Bar Date Order), in accordance with Del. Bankr. LR. 1009-2, the Debtor is required to give notice of any amendment or supplement to the holders of claims affected thereby within fourteen (14) days thereof, and such holders, as set forth in any such notice, shall have until the **later** of (i) the General Bar Date, and (ii) twenty-one (21) days from the date of service of such notice to file a proof of claim (the “Amended Schedules Bar Date”).

PLEASE TAKE FURTHER NOTICE that in accordance with the Bar Date Order and Del. Bankr. LR. 1009-2, if you dispute the amount, nature, classification or characterization of your claim—i.e., the removal of your claim, then you must file a written proof of such claim, in conformity with the Bar Date Order, and substantially in conformity with the proof of claim form attached hereto as **Exhibit B**, so that such proof of claim is **ACTUALLY RECEIVED ON OR BEFORE 4:00 P.M., EASTERN TIME, ON JUNE 18, 2021** by the Court-appointed Claims Agent at one of the following designated addresses:

¹ The last four digits of the Reorganized Debtor’s federal tax identification number are 2229. The location of the Reorganized Debtor’s principal place of business is 250 West 39th Street, Suite 202, New York, NY 10018.

If by First-Class Mail:

Donlin Recano & Company, Inc.
Re: MUJI U.S.A. Limited
P.O. Box 199043
Blythebourne Station, Brooklyn, NY 11219

If by Hand Delivery or Overnight Mail:

Donlin Recano & Company, Inc.,
Re: MUJI U.S.A. Limited
6201 15th Avenue, Brooklyn, NY 11219

Alternatively, proofs of claim may be submitted electronically using the interface available on the website maintained by the Claims Agent: <https://www.donlinrecano.com/Clients/mu/FileClaim>.

Facsimile or electronic-mail submission of proof(s) of claim shall not constitute proper filing pursuant to this Notice, and any proof(s) of claim so submitted shall be invalid and forever barred.

Dated: May 28, 2021

GREENBERG TRAURIG, LLP

By: /s/ Dennis A. Meloro
Dennis A. Meloro (DE Bar No. 4435)
1007 North Orange Street, Suite 1200
Wilmington, Delaware 19801
Tel. (302) 661-7000
Email: melorod@gtlaw.com

Counsel for the Reorganized Debtor

EXHIBIT A

Fill in this information to identify the case:**Debtor name:** MUJI U.S.A. Limited**United States Bankruptcy Court for the:** District of Delaware**Case number (if known):** 20-11805☒ Check if this is an amended filing

Official Form 206Sum

Summary of Assets and Liabilities for Non-Individuals

12/15

Part 1: Summary of Assets**1. Schedule A/B: Assets—Real and Personal Property** (Official Form 206A/B)

1a. Real property: Copy line 88 from Schedule A/B	\$20,214,405.16
1b. Total personal property: Copy line 91A from Schedule A/B	\$33,845,184.84
1c. Total of all property: Copy line 92 from Schedule A/B	\$54,059,590.00

Part 2: Summary of Liabilities

2. Schedule D: Creditors Who Have Claims Secured by Property (Official Form 206D) Copy the total dollar amount listed in Column A, Amount of claim, from line 3 of Schedule D	\$4,003,556.00
3. Schedule E/F: Creditors Who Have Unsecured Claims (Official Form 206E/F)	
3a. Total claim amounts of priority unsecured claims: Copy the total claims from Part 1 from line 5a of Schedule E/F	\$54,843.44
3b. Total amount of claims of nonpriority amount of unsecured claims: Copy the total of the amount of claims from Part 2 from line 5b of Schedule E/F	+ \$62,582,391.31
4. Total liabilities Lines 2 + 3a + 3b	\$66,640,790.75

Fill in this information to identify the case:**Debtor name:** MUJI U.S.A. Limited**United States Bankruptcy Court for the:** District of Delaware**Case number (if known):** 20-11805☒ Check if this is an amended filing

Official Form 206E/F

Schedule E/F: Creditors Who Have Unsecured Claims

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Be as complete and accurate as possible. Use Part 1 for creditors with PRIORITY unsecured claims and Part 2 for creditors with NONPRIORITY unsecured claims. List the other party to any executory contracts or unexpired leases that could result in a claim. Also list executory contracts on *Schedule A/B: Assets - Real and Personal Property* (Official Form 206A/B) and on *Schedule G: Executory Contracts and Unexpired Leases* (Official Form 206G). Number the entries in Parts 1 and 2 in the boxes on the left. If more space is needed for Part 1 or Part 2, fill out and attach the Additional Page of that Part included in this form.

Part 2: List All Creditors with NONPRIORITY Unsecured Claims¹

3. List in alphabetical order all of the creditors with nonpriority unsecured claims. If the debtor has more than 6 creditors with nonpriority unsecured claims, fill out and attach the Additional Page of Part 2.

3.25	Nonpriority creditor's name and mailing address	As of the petition filing date, the claim is: <i>Check all that apply.</i>	Amount of Claim
	ESPINOZA, GABRIEL BRODSKY & SMITH, LLC EVAN J. SMITH 9595 WILSHIRE BLVD #900 BEVERLY HILLS CA 90212 Date or dates debt was incurred 2/20/2020 Last 4 digits of account number:	<input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed Basis for the claim: PENDING LITIGATION Is the claim subject to offset? <input type="checkbox"/> No <input type="checkbox"/> Yes	\$28,000.00

¹The amendment modifies Schedule E/F part 2 by deleting item 3.25. Schedule E/F Part 1 and Part 2 are otherwise unaltered with respect to all information previously included therein.

Debtor **MUJI U.S.A. Limited**Case number (if known) **20-11805****Part 4: Total Amounts of the Priority and Nonpriority Unsecured Claims**

5. Add the amounts of priority and nonpriority unsecured claims.**Total of claim amounts**

5a. Total claims from Part 1	5a.		\$54,843.44
5b. Total claims from Part 2	5b.	+	\$62,582,391.31
5c. Total of Parts 1 and 2 Lines 5a + 5b = 5c.	5c.		\$62,637,234.75

Fill in this information to identify the case:**Debtor name:** MUJI U.S.A. Limited**United States Bankruptcy Court for the:** District of Delaware**Case number (if known):** 20-11805Official Form 202**Declaration Under Penalty of Perjury for Non-Individual Debtors**

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An individual who is authorized to act on behalf of a non-individual debtor, such as a corporation or partnership, must sign and submit this form for the schedules of assets and liabilities, any other document that requires a declaration that is not included in the document, and any amendments of those documents. This form must state the individual's position or relationship to the debtor, the identity of the document, and the date. Bankruptcy Rules 1008 and 9011.

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Declaration and signature

I am the president, another officer, or an authorized agent of the corporation; a member or an authorized agent of the partnership; or another individual serving as a representative of the debtor in this case.

I have examined the information in the documents checked below and I have a reasonable belief that the information is true and correct:

- ☐ *Schedule A/B: Assets—Real and Personal Property* (Official Form 206A/B)
- ☐ *Schedule D: Creditors Who Have Claims Secured by Property* (Official Form 206D)
- ☐ *Schedule E/F: Creditors Who Have Unsecured Claims* (Official Form 206E/F)
- ☐ *Schedule G: Executory Contracts and Unexpired Leases* (Official Form 206G)
- ☐ *Schedule H: Codebtors* (Official Form 206H)
- ☐ *Summary of Assets and Liabilities for Non-Individuals* (Official Form 206Sum)
- ☒ Amendment to *Schedule E/F*, Part 2 and Part 4 and Amended Summary of Assets and Liabilities
- ☐ *Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders* (Official Form 204)
- ☐ Other document that requires a declaration _____

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 5/28/2021
MM/DD/YYYY

x

/s/ John Bittner

Signature of individual signing on behalf of debtor

John Bittner
Printed name

Authorized Person
Position or relationship to debtor