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8 *Attorneys for Debtors and*
9 *Debtors in Possession*

10 **UNITED STATES BANKRUPTCY COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN JOSE DIVISION**

13 In re:

14 STORCENTRIC, INC., *et al.*,

15 Debtors.¹

Case No. 22-50515 (MEH)

Chapter 11

(Jointly Administered)

16 **NOTICE OF CONTINUED SALE**
17 **HEARING AND EXTENSION OF**
18 **CLOSING DEADLINE**

19 Date: September 21, 2022

20 Time: 10:00 a.m. (prevailing Pacific Time)

21 Place: United States Bankruptcy Court

280 South First Street

Courtroom 11

San Jose, CA 95113-3099 and

Telephonic/Video

Judge: Hon. M. Elaine Hammond

23 **PLEASE TAKE NOTICE** that, on June 30, 2022, the above-captioned debtors and debtors
24 in possession (collectively, the “Debtors”), filed the *Motion of Debtors for Entry of Orders (A)(I)*
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27 ¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are:
28 StorCentric, Inc. (6210); Nexsan Technologies Incorporated (5244); Nexsan Corporation (9778); Connected Data, Inc. (5504); Drobo, Inc. (2545); Retrospect, Inc. (0638); VS Acquisition Company, LLC. The Debtors’ business address is 1289 Anvilwood Avenue, Sunnyvale, CA 94089.

1 *Approving Bidding Procedures, (II) Approving Stalking Horse Bid Protections, (III) Scheduling the*
2 *Bid Deadlines and the Auction, (IV) Scheduling a Hearing and Objection Deadline with Respect to*
3 *the Sale, (V) Approving the Form and Manner of Notice Thereof, (VI) Approving Contract*
4 *Assumption and Assignment Procedures, and (VII) Granting Related Relief; and (B)(I) Approving*
5 *the Sale of the Assets Free and Clear of All Liens, Claims, Interests, and Encumbrances, (II)*
6 *Approving Assumption and Assignment of Executory Contracts and Unexpired Leases, and (III)*
7 *Granting Related Relief; and (C) Granting Related Relief [Dkt. No. 65] (the “Bidding Procedures*
8 *Motion”).*

9 **PLEASE TAKE FURTHER NOTICE** that, on July 20, 2022, the Debtors filed the *Notice*
10 *of Filing of Revised Proposed Order (I) Approving Bidding Procedures, (II) Approving Stalking*
11 *Horse Bid Protections, (III) Approving Contract Assumption and Assignment Procedures and the*
12 *Form and Manner of Notice Thereof; (IV) Scheduling the Auction; (V) Scheduling a Hearing and*
13 *Objection Deadlines with Respect to the Sale, (VI) Approving the Form and Manner of Notice*
14 *Thereof, and (VII) Granting Related Relief [Dkt. No. 131] (the “Notice of Revised Proposed*
15 *Order”).*

16 **PLEASE TAKE FURTHER NOTICE** that the hearing on the Bidding Procedures Motion
17 occurred on July 21, 2022 at 10:00 a.m. (prevailing Pacific Time).

18 **PLEASE TAKE FURTHER NOTICE** that on July 22, 2022, the Court entered the *Order*
19 *(I) Approving Bidding Procedures, (II) Approving Stalking Horse Bid Protections, (III) Approving*
20 *Contract Assumption and Assignment Procedures and the Form and Manner of Notice Thereof; (IV)*
21 *Scheduling the Auction; (V) Scheduling a Hearing and Objection Deadlines with Respect to the*
22 *Sale, (VI) Approving the Form and Manner of Notice Thereof, and (VII) Granting Related Relief*
23 *[Dkt. No. 141] (the “Bidding Procedures Order”).²*

24 **PLEASE TAKE FURTHER NOTICE** that the Bidding Procedures allow the Debtors to
25 extend the Bid Deadline, the Auction deadline, the Sale Hearing, and Closing Deadline with consent
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27 ² Capitalized terms used but not otherwise defined herein shall have the same meaning set forth in the Bidding
28 Procedures Order.

1 of UMB Bank, National Association (the “Trustee”) or Newlight Capital, LLC (the “Servicer”)
2 (collectively, the “Prepetition Secured Parties”), and in consultation with (i) the Prepetition Secured
3 Parties, (ii) Peleus Insurance Company (the “Insurer”), (iii) Serene Investment Management, LLC
4 (the “DIP Lender”), (iv) Libertas Funding LLC and Web Bank (the “Other Secured Parties”), and
5 (v) the Official Committee of Unsecured Creditors (the “Committee”) (collectively, the
6 “Consultation Parties”).

7 **PLEASE TAKE FURTHER NOTICE** that the Debtors filed Notices on August 12, 2022
8 [Dkt. No. 186], August 29, 2022 [Dkt. No. 212], and September 7, 2022 [Dkt. No. 231] to extend
9 certain deadlines related to the sale.

10 **PLEASE TAKE FURTHER NOTICE** that, on September 6, 2022, the Debtors filed the
11 *Notice of Cancellation of Auction and Winning Bid* [Dkt. No. 229], cancelling the auction and
12 designating Enceladus Development Venture III, LLC as the Winning Bidder for the Assets.

13 **PLEASE TAKE FURTHER NOTICE** that the hearing on the Sale Motion [Dkt. No. 193]
14 occurred on September 15, 2022 at 10:00 a.m. (prevailing Pacific Time). At the Sale Hearing,
15 various parties in interest, for the reasons stated on the record, requested that the Sale Hearing be
16 continued to September 21, 2022. The requested continuance of the Sale Hearing was granted by
17 the Court.

18 **PLEASE TAKE FURTHER NOTICE** that the Debtors and Consultation Parties, with the
19 express consent of the Prepetition Secured Parties, have also agreed to extend the deadline by which
20 the Debtors shall have closed and consummated the Sale to September 26, 2022 by 5:00 p.m.
21 (prevailing Pacific Time), subject to the *Stipulation and Agreed Order to Extend Debtors’ Use of*
22 *Cash Collateral to September 26, 2022* [Dkt. No. 236].

23 **PLEASE TAKE FURTHER NOTICE** that the Sale Hearing will be conducted in person
24 and via Zoom videoconference on **September 21, 2022 at 10:00 a.m. (prevailing Pacific Time)**
25 before the Honorable M. Elaine Hammond, United States Bankruptcy Judge, 280 South First Street,
26 San Jose, California 95113, Courtroom 11. The Bankruptcy Court’s website provides information
27 regarding how to arrange a telephonic or video appearance. If you have any questions regarding
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1 how to appear at a court hearing, you may contact the Bankruptcy Court by calling 888-821-7606
2 or by using the Live Chat feature on the Bankruptcy Court's website.

3 **PLEASE TAKE FURTHER NOTICE** that the Sale Objection Deadline for written
4 objections is September 20, 2022, and objections may be raised orally at the Sale Hearing.

5 Dated: September 15, 2022

JONES WALKER LLP

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7 By: /s/ John W. Mills

8 John W. Mills

9 Mark A. Mintz

10 *Attorneys for Debtors and Debtors in Possession*

11 **CERTIFICATE OF SERVICE**

12 I hereby certify that a copy of the above and foregoing pleading was served this 15th day of
13 September, 2022, on all counsel entitled to receive notice by this Court's CM/ECF system.

14 /s/ John W. Mills

15 JOHN W. MILLS
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