

1 John W. Mills, III (CA Bar No. 149861)  
2 jmills@joneswalker.com  
3 JONES WALKER LLP  
4 3455 Peachtree Road, NE, Suite 1400  
5 Atlanta, GA 30326  
6 Telephone: (404) 870-7517  
7 Facsimile: (404) 870-7557

Mark A. Mintz (*pro hac vice* forthcoming)  
mmintz@joneswalker.com  
JONES WALKER LLP  
201 St. Charles Ave, Ste 5100  
New Orleans, LA 70170  
Telephone: (504) 582-8368  
Facsimile: (504) 589-8368

8 *Proposed 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.<sup>1</sup>

Case No. 22-50515

Chapter 11

**NOTICE OF HEARING ON  
SHORTENED TIME AND PROPOSED  
AGENDA FOR FIRST DAY MOTIONS  
AND FIRST DAY HEARING**

Date: June 22, 2022

Time: 2:00 p.m.

Place: **Telephonic/Video Appearance Only**

Courtroom 11

280 South First Street

San Jose, CA 95113

Judge: Hon. M. Elaine Hammond

21  
22 **PLEASE TAKE NOTICE** that on June 20, 2022 (the “Petition Date”), StorCentric, Inc.  
23 (“StorCentric”) and its debtor affiliates, as debtors and debtors in possession (collectively, the  
24 “Debtors”) in the above-captioned chapter 11 cases (the “Bankruptcy Cases”), each filed a voluntary  
25 petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”)

26  
27 <sup>1</sup> 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 with the United States Bankruptcy Court for the Northern District of California (San Jose Division)  
2 (the “Bankruptcy Court”).

3 **PLEASE TAKE FURTHER NOTICE** that a hearing to be conducted via Zoom  
4 videoconference has been scheduled for June 21, 2022 at 2:00 p.m. (Prevailing Pacific Time) (the  
5 “First Day Hearing”), before the Honorable M. Elaine Hammond United States Bankruptcy Judge,  
6 in Courtroom 11 to consider the motions and applications filed by the Debtors and listed in Section  
7 II of the proposed agenda (the “First Day Motions”) on an emergency basis, as set forth below:

8 **By Zoom VideoConference Link:**

9 <https://www.zoomgov.com/j/1606685431?pwd=VW0va2k4MG5BUGh2czRiUktvN0pQZz09>

10 Passcode: 668323

11 **By Telephone:** Dial (for higher quality, dial a number based on your current location):

12 US: +1 669 254 5252 or +1 669 216 1590 or +1 551 285 1373 or +1 646 828 7666

13 **PLEASE TAKE FURTHER NOTICE** that a proposed agenda with respect to the First  
14 Day Hearing is set forth below. At the First Day Hearing, the Court will hear the First Day Motions.  
15 Copies of each pleading identified below can be viewed and/or obtained by: (i) accessing the Court’s  
16 website at <http://www.canb.uscourts.gov>, (ii) contacting the Office of the Clerk of the Court at 450  
17 Golden Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors’ proposed notice and  
18 claims agent, Donlin, Recano & Company, Inc. (“Donlin Recano”) at the case website of  
19 <https://www.donlinrecano.com/Clients/sci/Index>, or toll free at: 1-866-342-8290 or submit an  
20 inquiry via email to [storcentricinfo@donlinrecano.com](mailto:storcentricinfo@donlinrecano.com). Note that a PACER password is needed to  
21 access documents on the Court’s website.

22 **PLEASE TAKE FURTHER NOTICE** that, the hearing will not be conducted in the  
23 presiding judge’s courtroom but instead will be conducted by telephone or video. All interested  
24 parties should consult the Bankruptcy Court’s website at [www.canb.uscourts.gov](http://www.canb.uscourts.gov) for information  
25 about court operations during the COVID-19 pandemic. The Bankruptcy Court’s website provides  
26 information regarding how to arrange a telephonic or video appearance. If you have any questions  
27 regarding how to appear at a court hearing, you may contact the Bankruptcy Court by calling 888-  
28 821-7606 or by using the Live Chat feature on the Bankruptcy Court’s website.

#100466757v1

1 PLEASE TAKE FURTHER NOTICE that any objections or responses to the First Day  
2 Motions may be raised at or before the First Day Hearing.

3 **AGENDA FOR FIRST DAY HEARING ON JUNE 22, 2022 AT 2:00 P.M.**<sup>2</sup>

4 **A. Introduction/Opening Statement**

- 5 i. John W. Mills, III (Jones Walker LLP)

6 **B. Motions and Applications to Be Heard at First Day Hearing**

- 7 i. Joint Administration Motion. Debtors' Application for Order Authorizing Joint  
8 Administration Pursuant to 11 U.S.C. § 105(a) and Federal Rule of Bankruptcy  
9 Procedure 1015(b) [Dkt. No. 3]
- 10 ii. Designation of Responsible Individual. Debtors' Application for Order Approving  
11 Designation of John Coughlan as Responsible Individual Pursuant to Bankruptcy  
12 Local Rule 4002-1 [Dkt. No. 4]
- 13 iii. Schedules Extension Motion. Debtors' Motion for Order Extending Time to File  
14 Schedules of Assets and Liabilities and Statements of Financial Affairs [Dkt. No. 5]
- 15 iv. Case Management Motion. Debtors' Motion for Order (I) Implementing Certain  
16 Complex Case Management Procedures; (II) Limiting Notice of Certain Motions;  
17 and (III) Granting Related Relief [Dkt. No. 6].
- 18 v. Claims Agent Application. Application of Debtor Pursuant to 28 U.S.C. § 156(c)  
19 and 11 U.S.C. §§ 105(a), 327, and 503(b) for an Order Appointing Donlin, Recano  
20 & Company, Inc. as Claims, Noticing, and Solicitation Agent Nunc Pro Tunc to the  
21 Petition Date [Dkt. No. 7].
- 22 vi. Interim Compensation Motion. Debtors' Motion for Authority to Establish  
23 Procedures for Interim Compensation and Reimbursement of Expenses of  
24 Professionals [Dkt. No. 10].
- 25 vii. Oversize Briefing Motion. Debtors' Motion Pursuant to Local Bankruptcy Rule  
26 9013-1(c) for Entry of an Order Authorizing Oversize Briefing for Certain First Day  
27 Motions [Dkt. No. 11].
- 28 viii. Consolidated Creditor List Motion. Motion of Debtors Pursuant to 11 U.S.C. §§ 105,  
342, and 521 for Order (I) Waving Creditor List Requirements and (ii) Approving  
Certain Procedures for Providing Notice to Creditors [Dkt. No. 12].
- ix. Motion to Shorten Time. Debtors' Motion Pursuant to Bankruptcy Local Rule 9006-  
1 Requesting an Order Shortening Time for Hearing on First Day Motions [Dkt. No.  
15].

---

<sup>2</sup> Docket entry numbers relate to Case No. 22-50515 unless otherwise noted.

1 **C. Operational Motions**

- 2 i. Insurance Motion. Debtors' Motion for Interim and Final Orders Authorizing the  
3 Debtors to (I) Continue Existing Insurance Coverage and Satisfy Obligations Related  
4 Thereto in the Ordinary Court of Business; and (II) Renew, Amend, Supplement,  
5 Extend Or Purchase Insurance Policies [Dkt. No. 8]
- 6 ii. Utilities Motion. Debtors' Motion Pursuant to 11 U.S.C. §§ 366 and 105(a)  
7 Requesting Entry of Interim and Final Orders (I) Approving Debtors' Proposed  
8 Form of Adequate Assurance of Payment to Utility Providers, (II) Establishing  
9 Procedures Proving Adequate Assurance and Resolving Objection of Utility  
10 Providers and (III) Prohibiting Utility Providers from Altering Refusing Or  
11 Discontinuing Utility Service [Dkt. No. 9].
- 12 iii. Wage Motion. Debtors' Motion for Entry of Interim and Final Orders: (I)  
13 Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, and Other  
14 Compensation, and (B) Pay and Honor Benefits and Other Workforce Obligations;  
15 (II) Authorizing and Directing the Applicable Banks to Pay All Checks and Electronic  
16 Payment Requests Made by the Debtors Relating to the Foregoing; and (III) Granting  
17 Related Relief [Dkt. No. 13]
- 18 iv. Cash Management Motion. Debtors' Debtors' Motion Pursuant for Entry of Interim  
19 and Final Orders (I) Authorizing Maintenance of Existing Bank Accounts; (II)  
20 Authorizing Continuance of Existing Cash Management System; (III) Granting  
21 Limited Waiver of Section 345(b) Deposit and Investment Requirements; and (IV)  
22 Granting Related Relief [Dkt. No. 14].
- 23 v. Claims Agent Application. Application of Debtor Pursuant to 28 U.S.C. § 156(c)  
24 and 11 U.S.C. §§ 105(a), 327, and 503(b) for an Order Appointing Donlin, Recano  
25 & Company, Inc. as Claims, Noticing, and Solicitation Agent Nunc Pro Tunc to the  
26 Petition Date [Dkt. No. 7].
- 27 vi. DIP Financing Motion. Debtors' Motion For Entry of Interim and Final Orders (I)  
28 Authorizing the Debtors to Obtain Postpetition Secured Financing Pursuant to  
Section 364 of the Bankruptcy Code; (II) Authorizing the Debtors to Use Cash  
Collateral; (III) Granting Liens and Superpriority Administrative Expense Claims;  
(IV) Granting Adequate Protection; (V) Modifying the Automatic Stay; Scheduling a  
Final Hearing; and (VII) Granting Related Relief [Dkt. No. 20].

23 **C. Other Filed Documents the Court May Consider**

- 24 i. Coughlan First Day Declaration. Declaration of John Coughlan, Chief Financial  
25 Officer, In Support of Debtors' Chapter 11 Petitions and First Day Relief [Dkt. No.  
26 16].
- 27 ii. Meislik Declaration. Declaration of Adam Meislik in Support of Motion for Entry of  
28 Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Secured  
Financing Pursuant to Section 364 of the Bankruptcy Code; (II) Authorizing the

1                   *Debtors to Use Cash Collateral; (III) Granting Liens and Superpriority*  
2                   *Administrative Expense Claims; (IV) Modifying the Automatic Stay; (V) Scheduling*  
3                   *a Final Hearing, and (VI) Granting Related Relief* [Dkt. No. 19].

4                   iii.     Voluntary Petitions

5                   Dated: June 21, 2022

JONES WALKER LLP

6                   By: /s/ John W. Mills

7                   John W. Mills

8                   Mark A. Mintz

9                   *Proposed Attorneys for Debtors and Debtors in*  
10                  *Possession*