

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

In re

YOUFIT HEALTH CLUBS, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 20-12841 (MFW)

(Jointly Administered)

**NOTICE OF NON-VOTING STATUS AND (I) INTERIM APPROVAL OF THE  
DISCLOSURE STATEMENT, (II) ESTABLISHMENT OF SOLICITATION  
AND VOTING PROCEDURES, (III) DEADLINE FOR VOTING ON THE PLAN,  
(IV) FINAL COMBINED HEARING ON APPROVAL OF THE DISCLOSURE  
STATEMENT AND CONFIRMATION OF THE PLAN, AND (V) DEADLINE  
FOR FILING OBJECTIONS THERETO**

**PLEASE TAKE NOTICE THAT** on March 2 2021, the Debtors filed the *Proposed Combined Disclosure Statement and Amended Chapter 11 Plan of Liquidation* [Docket No. 788] (as may be further modified, amended, or supplemented, the “**Combined Plan and Disclosure Statement**”)<sup>2</sup> and on March 4, 2021, the United States Bankruptcy Court for the District of Delaware (the “**Court**”) entered an order [Docket No. 801] (the “**Order**”) approving, on an interim basis, the Disclosure Statement as containing adequate information within the meaning of section 1125 of the Bankruptcy Code.

**PLEASE TAKE FURTHER NOTICE THAT** because of the nature and treatment of your Claim under the Plan, *you are not entitled to vote on the Plan*. Specifically, under the terms of the Plan, as a Holder of a Claim (as currently asserted against the Debtors) that either is unimpaired such that you are conclusively presumed to have accepted the Plan pursuant to section 1126(f) of the Bankruptcy Code, or is impaired such that you are conclusively presumed to have rejected the Plan pursuant to section 1126(g) of the Bankruptcy Code, you are *not* entitled to vote on the Plan.

**PLEASE TAKE FURTHER NOTICE THAT** pursuant to the Order, on **April 22, 2021, at 10:30 a.m. (prevailing Eastern Time)**, or as soon thereafter as counsel may be heard, a hearing (the “**Combined Hearing**”) will be held before the Honorable Mary F. Walrath, United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 5th Floor, Courtroom

<sup>1</sup> The last four digits of YouFit Health Clubs, LLC’s tax identification number are 6607. Due to the large number of debtor entities in the Chapter 11 Cases, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the claims and noticing agent at [www.donlinrecano.com/yfhc](http://www.donlinrecano.com/yfhc). The mailing address for the debtor entities for purposes of the Chapter 11 Cases is: 1350 E. Newport Center Dr., Suite 110, Deerfield Beach, FL 33442.

<sup>2</sup> Capitalized terms used but otherwise not defined in this Objection Deadline and Hearing Notice have the meanings ascribed to them in the Combined Plan and Disclosure Statement or the Order.

#4, Wilmington, Delaware 19801, to consider confirmation of the Plan and approval of its disclosure provisions on a final basis. The Combined Hearing may be adjourned from time to time without further notice. The Plan may be modified in accordance with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, the terms of the Plan, and other applicable law, without further notice, prior to, or as a result of, the Combined Hearing.

**PLEASE TAKE FURTHER NOTICE THAT** any objection, comment, or response to confirmation of the Plan or approval of the Disclosure Statement on a final basis, including any supporting memoranda, must be filed with the Clerk of the Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, together with proof of service, on or before **April 12, 2021, at 4:00 p.m. (prevailing Eastern Time)** (the “**Confirmation Objection Deadline**”) and must (i) be in writing, (ii) state the name and address of the objecting party, (iii) state the amount and nature of the claim or interest of such party, (iv) state with particularity the basis and nature of any objection to the Plan or approval of the Disclosure Statement on a final basis, and (v) be served so as to be received by the following parties on or before the Confirmation Objection Deadline on: (i) counsel for the Debtors, E Traurig, LLP, (a) The Nemours Building, 1007 North Orange Street, Suite 1200, Wilmington, DE 19801 (Attn: Dennis A. Meloro (melorod@gtlaw.com) and (b) 77 West Wacker Dr., Suite 3100, Chicago, IL 60601 (Attn: Nancy A. Peterman (petermann@gtlaw.com), Eric Howe (howee@gtlaw.com), and Nicholas E. Ballen (ballenn@gtlaw.com)); (ii) the Office of the U.S. Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801, Attn: Hannah McCollum, Esq. (hannah.mccollum@usdoj.gov); (iii) counsel for the Debtors’ prepetition and postpetition agent and lenders and the Buyer, (a) Winston & Strawn LLP, 200 Park Avenue, New York, NY 10166, Attn: Carey D. Schreiber, Esq. (cschreiber@winston.com) and Gregory M. Gartland, Esq. (ggartland@winston.com), and (b) Young Conaway Stargatt & Taylor, LLP, 1000 N. King Street, Wilmington, Delaware 19801, Attn: Joseph Barry, Esq. (jbarry@ycst.com) and Joseph M. Mulvihill, Esq. (jmulvihill@ycst.com); (iv) counsel for the DIP Agent and Prepetition Agent, Holland & Knight LLP, 150 N. Riverside Plaza, Suite 2700, Chicago, IL 60606, Attn: Joshua Spencer (joshua.spencer@hklaw.com), Phillip W. Nelson (phillip.nelson@hklaw.com), and Anastasia Sotiropoulos (anastasia.sotiropoulos@hklaw.com); and (v) counsel for the Official Committee of Unsecured Creditors, Berger Singerman, LLP, 1450 Brickell Avenue, Suite 1900, Miami, FL 33131 (Attn: Brian G Rich (brich@bergersingerman.com) and Michael Niles (mniles@bergersingerman.com)) and Pachulski Stang Ziehl & Jones LLP, 919 N. Market Street, 17th Floor, Wilmington, DE 19801 (Attn: Bradford Sandler (bsandler@pszjlaw.com) and Colin Robinson (crobinson@pszjlaw.com)).

<p><b>DISCLOSURE AND CONFIRMATION OBJECTIONS NOT TIMELY FILED AND SERVED IN THE MANNER SET FORTH HEREIN MAY NOT BE CONSIDERED BY THE COURT AND MAY BE OVERRULED WITHOUT FURTHER NOTICE.</b></p>
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**PLEASE TAKE FURTHER NOTICE THAT** copies of the Combined Plan and Disclosure Statement, the Order, additional materials in the Chapter 11 Cases may be obtained free of charge at <https://www.donlinrecano.com/Clients/yfhc/Index> (or viewed on the Internet, for a fee, at the Court’s website <http://www.deb.uscourts.gov> by following the directions for accessing the ECF system on such website). Parties in interest may also request copies of the Combined Plan

and Disclosure Statement from the Balloting Agent at [DRCVote@DonlinRecano.com](mailto:DRCVote@DonlinRecano.com). **Please note that the Balloting Agent is not permitted to give legal advice.**

Dated: March 9, 2021  
Wilmington, Delaware

**GREENBERG TRAURIG, LLP**

/s/ Dennis A. Meloro

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- and -

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