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

Chapter 15
Case No. 25-11864 (CTG)

# NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING ON OCTOBER 28, 2025 AT 10:00 A.M. (PREVAILING EASTERN TIME)

### This proceeding will be conducted via Zoom.

Please refer to Judge Goldblatt's Chambers Procedures
(<a href="https://www.deb.uscourts.gov/judge-craig-t-goldblatt">https://www.deb.uscourts.gov/judge-craig-t-goldblatt</a>) and the Court's website
(<a href="http://www.deb.uscourts.gov/ecourt-appearances">http://www.deb.uscourts.gov/ecourt-appearances</a>) for information on who may participate remotely, the method of allowed participation (video or audio), Judge Goldblatt's expectations of remote participants, and the advance registration requirements.

Registration is required by one-hour prior to the hearing unless otherwise noticed using the *eCourtAppearances* tool available on the Court's website

#### I. <u>PETITION AND FIRST DAY DECLARATION:</u>

- 1. Petition [D.I. 1; filed 10/23/25]
  - a. Verification of Chapter 15 Petition [D.I. 1-1; filed 10/23/25]
  - b. Corporate Ownership Statement Pursuant to Federal Rules of Bankruptcy Procedure 1007 and 7007.1 [D.I. 1-2; filed 10/23/25]
  - c. Foreign Representative's Statement Pursuant to Federal Rule of Bankruptcy Procedure 1007(a)(4) [D.I. <u>1-3</u>; filed 10/23/25]
  - d. Foreign Representative's Statement Regarding Known Foreign Proceeding Pursuant to Section 1515 of the Bankruptcy Code [D.I. <u>1-4</u>; filed 10/23/25]
- 2. Declaration of Bryan A. Tannenbaum in Support of (i) Verified Chapter 15 Petition; (ii) Foreign Representative's Motion for Orders Granting Provisional and Final Relief in Aid of Foreign Main Proceeding: and (iii) Certain Related Relief [D.I. 3; filed 10/23/25]

Status: The Declaration will be relied upon as evidentiary support for the first day matters listed below.

#### II. FIRST DAY MOTIONS

3. Motion of Foreign Representative for Entry of Provisional and Final Orders Granting Recognition of Foreign Main Proceeding and Certain Related Relief Pursuant to Sections 362, 364(e), 1517, 1519, 1520, 1521, and 105(a) Of Bankruptcy Code [D.I. 8; filed 10/24/25]

#### **Related Documents**:

- i. [Proposed] Provisional Order [D.I. <u>8-1</u>; filed 10/24/25]
- ii. Memorandum of Law of Foreign Representative in Support of (I) Verified Chapter 15 Petition and (Iii) Motion of Foreign Representative for Orders Granting Provisional and Final Relief in Aid of Foreign Main Proceeding [D.I. <u>10</u>; filed 10/24/25]
- iii. Notice of Virtual Hearing on First Day Motions [D.I. 15; filed 10/24/25]

Status: This matter is going forward.

4. Motion of Foreign Representative for Entry of Order Scheduling Provisional and Final Hearings and Specifying Form and Manner of Service of Notice Pursuant to Sections 1515 And 105(a) Of Bankruptcy Code and Bankruptcy Rules 2002 And 9007 [D.I. 11; filed 10/24/25]

#### Related Documents:

- i. [Proposed] Order [D.I. 11-1; filed 10/24/25]
- ii. Notice of Virtual Hearing on First Day Motions [D.I. 15; filed 10/24/25]

Status: This matter is going forward.

[Signature follows on next page]

Dated: October 24, 2025 Wilmington, Delaware

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