

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: CBL & ASSOCIATES PROPERTIES, INC., <i>et al.</i>, Debtors.¹	§ § § § § §	Chapter 11 Case No. 20-35226 (DRJ) (Jointly Administered)
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**DEBTORS' WITNESS AND EXHIBIT LIST
FOR HEARING ON AUGUST 11, 2021**

CBL & Associates Properties, Inc. and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”), file this witness and exhibit list (the “**Witness and Exhibit List**”) for the hearing scheduled for August 11, 2021 at 9:00 a.m. (Prevailing Central Time) (the “**Hearing**”):

WITNESSES

The Debtors may call any of the following witnesses at the Hearing:

1. Farzana Khaleel, Executive Vice President, Chief Financial Officer and Treasurer, CBL & Associates Properties, Inc.;
2. Barak Klein, Senior Managing Director, Moelis & Company;
3. Mark A. Renzi, Managing Director, Berkley Research Group, LLC;
4. Jane Sullivan, Executive Vice President, Epiq Corporate Restructuring, LLC;
5. Any witness called or listed by any other party; and
6. Any rebuttal witnesses.

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://dm.epiq11.com/CBLProperties>. The Debtors' service address for the purposes of these chapter 11 cases is 2030 Hamilton Place Blvd., Suite 500, Chattanooga, Tennessee 37421.

EXHIBITS

The Debtors may offer into evidence any one or more of the following exhibits:

EXHIBIT NO.	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE
1.	Third Amended Joint Chapter 11 Plan of CBL & Associates Properties, Inc. and Its Affiliated Debtors (Docket No. 1163)				
2.	Notice of Filing of Amended Restructuring Support Agreement Among the Debtors, the Consenting Bank Lenders and Consenting Noteholders (Docket No. 980)				
3.	Prepetition Restructuring Support Agreement (Docket No. 3 – attached as Exhibit B)				
4.	Disclosure Statement for Third Amended Joint Chapter 11 Plan of CBL & Associates Properties, Inc. and Its Affiliated Debtors (Docket No. 1164)				
5.	Notice of Filing of Second Amended Plan Supplement for Third Amended Joint Chapter 11 Plan of CBL & Associates Properties, Inc. and Its Affiliated Debtors (Docket No. 1324)				
6.	Second Amended and Restated Certificate of Designations, Number, Voting Powers, Preferences and Rights of 7.375% Series D Cumulative Redeemable Preferred Stock of CBL & Associates Properties, Inc.				
7.	Certificate of Designations, Number, Voting Powers, Preferences and Rights of 6.625% Series E Cumulative Redeemable Preferred Stock of CBL & Associates Properties, Inc.				
8.	Minutes of the Special Meeting of the Board of Directors of CBL & Associates Properties, Inc., dated August 14, 2020 [Redacted]				
9.	Minutes of the Virtual Special Meeting of the Board of Directors of CBL & Associates Properties, Inc., dated March 12, 2021 [Redacted]				

EXHIBIT NO.	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE
10.	Current Reports on Form 8-K filed with the SEC by CBL & Associates Properties, Inc., dated September 29, 2020				
11.	Minutes of the Special Meeting of the Board of Directors of CBL & Associates Properties, Inc., dated October 14, 2020, Approving the Appointment of the Special Committee [Redacted]				
12.	Declaration of Jane Sullivan of Epiq Corporate Restructuring, LLC, regarding Voting and Tabulation of Ballots Cast on the Third Amended Joint Chapter 11 Plan of CBL & Associates Properties, Inc. and Its Affiliated Debtors (Docket No. 1354)				
13.	Affidavit of Service of Solicitation Materials (Docket No. 1234)				
14.	Publication Notice of Confirmation Hearing in the National Edition of the New York Times on July 9, 2021 (Docket No. 1357)				
15.	Publication Notice of Confirmation Hearing in the Chattanooga Times Free Press on July 9, 2021 (Docket No. 1358)				
16.	Minutes of the Meeting of the Special Committee of the Board of Directors of CBL & Associates Properties, Inc., dated April 13, 2021				
17.	Notice of Classification of Property-Level Guarantee Claims (Docket No. 1316)				
18.	Notice of Filing of Plan Supplement for Third Amended Joint Chapter 11 Plan of CBL & Associates Properties, Inc. and Its Affiliated Debtors (Docket No. 1315)				

EXHIBIT NO.	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE
19.	Notice of Filing of Amended Plan Supplement for Third Amended Joint Chapter 11 Plan of CBL & Associates Properties, Inc. and Its Affiliated Debtors (Docket No. 1322)				
20.	Declaration of Jane Sullivan of Epiq Corporate Restructuring, LLC, Regarding Solicitation of the Third Amended Joint Chapter 11 Plan of CBL & Associates Properties, Inc. and Its Affiliated Debtors (Docket No. TBD)				
21.	Notice of Filing of Third Amended Plan Supplement for Third Amended Joint Chapter 11 Plan of CBL & Associates Properties, Inc. and Its Affiliated Debtors (Docket No. TBD)				
22.	Second Notice of Classification of Property-Level Guarantee Claims (Docket No. TBD)				
23.	Declaration of Farzana Khaleel in Support of Confirmation of Third Amended Joint Chapter 11 Plan of CBL & Associates Properties, Inc. and Its Affiliated Debtors (Docket No. TBD)				
24.	Declaration of Mark A. Renzi in Support of Confirmation of Third Amended Joint Chapter 11 Plan of CBL & Associates Properties, Inc. and Its Affiliated Debtors (Docket No. TBD)				
25.	Declaration of Barak Klein in Support of Confirmation of Third Amended Joint Chapter 11 Plan of CBL & Associates Properties, Inc. and Its Affiliated Debtors (Docket No. TBD)				
26.	Third Amended Joint Chapter 11 Plan of CBL & Associates Properties, Inc. and Its Affiliated Debtors (with Technical Modifications) (Docket No. TBD)				
	Any pleading or other document filed with the Court on the docket of the above-captioned chapter 11 cases				

EXHIBIT NO.	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE
	Any exhibit necessary to rebut the evidence of testimony of any witness offered or designated by any other party				
	Any exhibit listed by any other party				

RESERVATION OF RIGHTS

The Debtors reserve the right to call or to introduce one or more, or none, of the witnesses and exhibits listed above, and further reserve the right to supplement this list at any time prior to the hearing.

Dated: August 9, 2021
Houston, Texas

Respectfully submitted,

/s/ Alfredo R. Pérez

WEIL, GOTSHAL & MANGES LLP

Alfredo R. Pérez (15776275)

700 Louisiana Street, Suite 1700

Houston, Texas 77002

Telephone: (713) 546-5000

Facsimile: (713) 224-9511

Email: Alfredo.Perez@weil.com

-and-

WEIL, GOTSHAL & MANGES LLP

Ray C. Schrock, P.C. (admitted *pro hac vice*)

Garrett A. Fail (admitted *pro hac vice*)

Moshe A. Fink (admitted *pro hac vice*)

767 Fifth Avenue

New York, New York 10153

Telephone: (212) 310-8000

Facsimile: (212) 310-8007

Email: Ray.Schrock@weil.com

Garrett.Fail@weil.com

Moshe.Fink@weil.com

Attorneys for Debtors

and Debtors in Possession

Certificate of Service

I hereby certify that on August 9, 2021, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Alfredo R. Pérez

Alfredo R. Pérez