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

^

	8	
In re:	§	Chapter 11
	§	
CBL & ASSOCIATES PROPERTIES,	§	
INC., et al.,	§	Case No. 20-35226 (DRJ)
	§	
Debtors. ¹	§	(Jointly Administered)

AMENDED NOTICE OF CURE AMOUNTS WITH RESPECT TO CERTAIN EXECUTORY CONTRACTS AND UNEXPIRED LEASES OF DEBTORS

PLEASE TAKE NOTICE that, on May 25, 2021, CBL & Associates Properties, Inc. and certain of its affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the "Debtors"), filed the *Third Amended Joint Chapter 11 Plan of CBL* & *Associates Properties, Inc. and Its Affiliated Debtors (with Technical Modifications)*, dated August 9, 2021 [Docket No. 1369] (the "Plan").²

PLEASE TAKE FURTHER NOTICE that, beginning on July 14, 2021 and concluding on July 16, 2021, in accordance with the Plan and the Amended Order (I) Approving Disclosure Statement and Form and Manner of Notice of Disclosure Statement Hearing, (II) Establishing Solicitation and Voting Procedures, (III) Scheduling Confirmation Hearing, (IV) Establishing Notice and Objection Procedures for Confirmation of the Proposed Plan, (V) Approving Notice Procedures for the Assumption and Assignment of Executory Contracts and Unexpired Leases, and (VI) Granting Related Relief [Docket No. 1168], the Debtors served the Notice of Cure Amounts with Respect to Executory Contracts and Unexpired Leases of Debtors

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.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Plan.

Case 20-35226 Document 1371 Filed in TXSB on 08/09/21 Page 2 of 6

[Docket No. 1317] (the "**Initial Cure Notice**"), on all parties to executory contracts and unexpired leases that may be assumed by the Debtors in connection with the Plan.

PLEASE TAKE FURTHER NOTICE that, in accordance with the Initial Cure Notice, certain parties raised formal and informal objections (collectively, the "Cure Objections") to the Cure Amounts listed on the schedule attached to the Initial Cure Notice as <u>Exhibit A</u> (the "Initial Cure Schedule").

PLEASE TAKE FURTHER NOTICE that the Debtors hereby file certain revisions to the Initial Cure Schedule, as set forth on **Exhibit A** hereto (the "**Amended Cure Schedule**" and together with the Initial Cure Schedule, the "**Cure Schedules**"), reflecting agreements reached between the Debtors and applicable contract counterparties resolving the Cure Objections and listing updated Cure Amounts in the column titled "Revised Cure Amount."

PLEASE TAKE FURTHER NOTICE that, the Debtors and certain contract counterparties have agreed to adjourn certain Cure Objections to a later date, and, for the avoidance of doubt, such counterparties' respective Cure Amounts shall not be set by the Cure Schedules unless and until agreed.

PLEASE TAKE FURTHER NOTICE that, except to the extent that a Cure Amount has been revised pursuant to the Amended Cure Schedule, the Initial Cure Schedule shall control.

PLEASE TAKE FURTHER NOTICE that parties should refer to Article VIII of the Plan for more information on the terms of assumption, assumption and assignment, rejection, and resolution of cure disputes.

PLEASE TAKE FURTHER NOTICE that the Debtors reserve all rights to amend, supplement, and otherwise modify the Cure Schedules, including to add or remove

2

Case 20-35226 Document 1371 Filed in TXSB on 08/09/21 Page 3 of 6

executory contracts and unexpired leases, to assert that contracts or leases identified on the Cure Schedules are not executory or unexpired, and to assert that contracts or leases not identified on the Cure Schedules are executory or unexpired. Dated: August 9, 2021 Houston, Texas

/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

<u>Exhibit A</u>

Amended Schedule of Proposed Cure Amounts for Assumed Contracts and Unexpired Leases

CBL & Associates Properties, Inc., et al.

\$

Schedule of Executory Contracts and Unexpired Leases to be Assumed by Debtors

Case #	Debtor	Contract Counterparty	Original Cure Amt	Revised Cure Amt
20-35424	VALLEY VIEW MALL SPE, LLC	COMFORT SYSTEMS USA	-	1,443.26
20-35230	CBL & ASSOCIATES MANAGEMENT, INC.	ERMC PROPERTY MANAGEMENT COMPANY, LLC	144,061.65	206,936.00
20-35230	CBL & ASSOCIATES MANAGEMENT, INC.	MICROSOFT	4,736.22	11,595.36
20-35230	CBL & ASSOCIATES MANAGEMENT, INC.	SECURAMERICA, LLC	29,438.59	41,584.13
20-35257	MADISON/WEST TOWNE, LLC	SERVICE SPECIALISTS	-	769.54
20-35405	STROUD MALL, LLC	STROUD TOWNSHIP VOLUNTEER FIRE CO.	-	14,438.36