

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

In re:

RGN-GROUP HOLDINGS, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 20-11961 (BLS)

(Jointly Administered)

RE: D.I. 1508

**DEBTORS' WITNESS AND AMENDED EXHIBIT LIST IN CONNECTION WITH THE
TRIAL ON DEBTORS' OBJECTION TO PROOF OF CLAIM NO. 10268 FILED BY
TEACHERS INSURANCE AND ANNUITY ASSOCIATION OF AMERICA [D.I. 1228]**

PLEASE TAKE NOTICE THAT the above captioned debtors and debtors in possession (collectively, the "Debtors") hereby submit their amended exhibit list in connection with the trial currently scheduled for August 12, 2021 at 9:30 a.m. (ET) in connection with the *Debtors' Objection to Proof of Claim No. 10268 filed by Teachers Insurance and Annuity Association of America* [D.I. 1228].

WITNESSES

1. Michael Osburn
2. Derreck Barker
3. Jack Nye
4. Any witness designated by TIAA

¹ The mailing address for the debtors in these chapter 11 cases is 3000 Kellway Drive, Suite 140, Carrollton, Texas 75006 (Attn: James S. Feltman, Responsible Officer). Due to the large number of debtors in these chapter 11 cases, which are being jointly administered for procedural purposes only, a complete list of the debtors is not provided herein. A complete list of the debtors along with the last four digits of their tax identification numbers, where applicable, may be obtained on the website of the debtors' noticing and claims agent at <https://dm.epiq11.com/case/rgn/info> or by contacting special conflicts counsel for the debtors (Amanda Hrycak, paralegal, at AHrycak@ashbygeddes.com).

Debtors reserve the right to call rebuttal witnesses as necessary. Debtors also reserve the right to amend or supplement this Witness List.

EXHIBITS

Exhibit No.	Date	Bates	Brief Description	Objections
HWORk1	03/25/2019		Letter of Intent (Barker 23)	
HWORk 2	08/14/2019	TIAA 0000731- TIAA 0000738	Email from Ian Fairchild to Lindsay Luby re: Revised Draft RGN Amendment	
HWORk 3	12/19/2019	TIAA 0000576- TIAA 0000577	Notice of delivery (Barker 24)	
HWORk 4	02/21/2020	TIAA 0001574- TIAA 0001586	Entos Design – 1 st Floor Restrooms	
HWORk 5	02/26/2020	TIAA 0001448	2020 Budget Revisions	
HWORk 6	08/31/2020	TIAA 0001366- TIAA 0001369	Email from Meg Hardin to Becky Doss re: Entos Invoice	
HWORk 7	09/08/2020	HWORk_000541- HWORk_000554	Email from Michael Rodts to Apryl Cahill re: Lincoln Centre - Entos Access (#5478 & 1098)	
HWORk 8	09/11/2020	HWORk_000508- HWORk_000524	Email from Apryl Cahill to Judy Bradford, Chungshen Oey re: Lincoln Centre Arrears	
HWORk 9	09/14/2020		Notice of Default	
HWORk 10	10/16/2020		Notice of Default (Barker 30)	
HWORk 11	10/17/2020	HWORk_000699- HWORk_000701	Email from Michael Sturdivant to Pat Rohling re: Regus III Lincoln Center #1098 - Attached Landlord Lockout Due to Non Payment of Rent	
HWORk 12	10/19/2020	HWORk_000728- HWORk_000734	Email from Michael Osburn to Jack Nye re: Lincoln Centre Arrears	

Exhibit No.	Date	Bates	Brief Description	Objections
HWORk 13	10/19/2020	HWORk_001043- HWORk_001046	Email from Judy Bradford to Laura Reyes et al. re: URGENT - DAL140 - Regus III Lincoln Center #1098 - Attached Landlord Lockout Due to Non Payment of Rent	
HWORk 14	10/19/2020	TIAA 0000013	Email from Michael Berretta to Derreck Barker re: Lockout	
HWORk 15	10/20/2020	HWORk_001236	DAL140-1098 payment history 1-1-18 - 10-20-20 [Native]	
HWORk 16	10/22/2020	HWORk_001237- HWORk_001247	Plaintiff's Sworn Petition and Application for Writ of Re-entry	
HWORk 17	10/23/2020	HWORk_001248- HWORk_001249	Email from Greg Nochese to Eric Pinker re: October Rent	
HWORk 18	10/23/2020	HWORk_001256- HWORk_001258	Notice to Vacate	
HWORk 19	10/26/2020	TIAA 0000127- TIAA 0000130	Email from Michael Berretta to Derreck Barker re: Lincoln Centre	
HWORk 20	11/04/2020	HWORk_001254- HWORk_001255	November Rent Return	
HWORk 21	11/04/2020	HWORk_001250- HWORk_001253	Email from Laura Reyes to Judy Bradford re: DAL140 (1098) Lincoln-Dallas November Rent	
HWORk 22	03/15/2021	TIAA 0001439- TIAA 0001441	Email from Mariaruby Pullado to Becky Doss re: follow up on security deposit refund (Barker 28)	
HWORk 23	04/08/2021	HWORk_001233- HWORk_001235	Munsch Hardt letter to Mr. Pinker enclosing returned rent check	
HWORk 24	06/21/2021	TIAA 0000306- TIAA 0000313	Marketing brochure (Barker 29)	

Exhibit No.	Date	Bates	Brief Description	Objections
HWORk 25	07/23/2021	TIAA 0001499	Cushman Wakefield RSF total for Lincoln Centre One	
HWORk 26	07/23/2021	TIAA 0001541-TIAA 0001553	Lincoln Centre Marketing Brochure	
HWORk 27	07/27/2021	HWORk_001230-HWORk_001232	Munsch Hardt letter to Mr. Pinker enclosing returned rent check	
HWORk 28	11/29/1990	TIAA 0001992-TIAA 0002047	Lease between Two Lincoln Centre and F. Brown & Associates	
HWORk 29	11/01/1995	TIAA 0002048-TIAA 0002054	First Amendment to Office lease Agreement	
HWORk 30	08/04/2002	TIAA 0002055-TIAA 0002060	Second Amendment to Office lease Agreement	
HWORk 31	12/19/2003	TIAA 0002061-TIAA 0002064	Third Amendment to Office lease Agreement	
HWORk 32	05/18/2007	TIAA 0002065-TIAA 0002082	Fourth Amendment to Office lease Agreement	
HWORk 33	08/11/2014	TIAA 0002083-TIAA 0002096	Fifth Amendment to Office lease Agreement	
HWORk 34	07/06/2016	TIAA 0002097-TIAA 0002110	Sixth Amendment to Office lease Agreement	
HWORk 35	05/10/2021		Order Granting RGN-Dallas Unopposed Motion to Dismiss Appeal and Release Bond	
HWORk 36	12/19/2019	TIAA 0000614-TIAA 0000618	Guarantee Agreement (executed)	

Debtors reserve the right to use any exhibit designated by Teachers Insurance and Annuity Association of America. Debtors reserve the right to amend or supplement this Exhibit List.

Dated: August 10, 2021
Wilmington, Delaware

/s/ Ricardo Palacio

ASHBY & GEDDES, P.A.

Ricardo Palacio (DE Bar No. 3765)
Benjamin W. Keenan (DE Bar No. 4724)
500 Delaware Avenue, 8th Floor
P.O. Box 1150
Wilmington, DE 19801
Tel.: (302) 654-1888
Fax: (302) 654-2067
Email: rpalacio@ashbygeddes.com
bkeen@ashbygeddes.com

*Special Conflicts Counsel
to the Debtors and Debtors in Possession*

**LYNN PINKER HURST &
SCHWEGMANN, LLP**

Eric W. Pinker (admitted *pro hac vice*)
Gregory A. Brassfield (admitted *pro hac vice*)
Bennett Hampilos (admitted *pro hac vice*)
2100 Ross Avenue, Suite 2700
Dallas, TX 75201
Tel: (214) 981-3837
Fax: (214) 981-3839
Email: epinker@lynnllp.com
bhampilos@lynnllp.com
gbrassfield@lynnllp.com

*Co-Counsel to the Debtors and Debtors in
Possession*