

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

In re:	: Chapter 11
FBI Wind Down, Inc. (f/k/a Furniture Brands International, Inc.),	: Case No. 13-12329 (CSS)
	:
Debtor. ¹	: Hearing Date: 1/12/2022 at 11:30 a.m. (ET)
	: Objection Deadline: 12/6/2021 at 4:00 p.m. (ET)

OMNIBUS NOTICE OF MOTIONS

PLEASE TAKE NOTICE that on November 22, 2021, Alan D. Halperin, in his capacity as the Liquidating Trustee (the “Liquidating Trustee”) of the FBI Wind Down, Inc. Liquidating Trust (the “Liquidating Trust”), filed the following motions (collectively, the “Motions”) with the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”):

- Motion of the Liquidating Trustee for Entry of an Order Further Extending the Term of the FBI Wind Down, Inc. Liquidating Trust Through and Including December 31, 2022
- Motion of the Liquidating Trustee for an Order Further Extending the Deadline to Object to Claims Filed Against the Debtors
- Motion of the Liquidating Trustee Pursuant to Bankruptcy Rules 9006(b) and 9027 for Entry of an Order Further Extending Time to File Notices of Removal of Civil Actions

Any response or objection to the Motion(s) must be filed in writing with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801, and served upon and received by the undersigned counsel for the Liquidating Trustee on or before **December 6, 2021, at 4:00 p.m. (prevailing Eastern Time)**.

If an objection or response is timely filed and served and is not otherwise resolved, a hearing to consider such response and the Motion(s) will be held before the Honorable Christopher S. Sontchi, United States Bankruptcy Judge, United States Bankruptcy Court for the District of Delaware, 5th Floor, Courtroom 6, 824 Market Street, Wilmington, Delaware 19801 on **January 12, 2022, at 11:30 a.m. (prevailing Eastern Time)**.

¹ The Debtor in this chapter 11 case, along with the last four digits of the Debtor’s federal tax identification number, is FBI Wind Down, Inc. (f/k/a Furniture Brands International, Inc.) (7683). On August 6, 2021, the Court entered an order closing the chapter 11 cases of FBI Wind Down, Inc.’s debtor affiliates, all of which were direct or indirect subsidiaries of FBI Wind Down, Inc. (collectively, the “Subsidiary Debtors”). A complete list of the Subsidiary Debtors, along with their federal tax identification numbers, is available through the Court’s CM/ECF electronic case filing system (<https://ecf.deb.uscourts.gov/>) under case no. 13-12329, at docket no. 3250.

Due to restrictions relating to COVID-19, it is anticipated that the hearing will be conducted virtually via Zoom. Further details regarding participating in the virtual hearing will be made available in advance of the hearing.

IF NO RESPONSES TO THE MOTIONS ARE TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED THEREIN WITHOUT FURTHER NOTICE OR HEARING.

Dated: November 22, 2021
Wilmington, Delaware

ARCHER & GREINER, P.C.

/s/ Bryan J. Hall

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-and-

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*Co-Counsel to Alan D. Halperin,
Liquidating Trustee of the
FBI Wind Down, Inc. Liquidating Trust*