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ATTORNEYS FOR DEBTORS

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

In re:	§	Chapter 11
	§	
Tuesday Morning Corporation, <i>et al.</i> , ¹	§	Case No. 20-31476-HDH-11
	§	
Debtors.	§	Jointly Administered

DEBTORS' NOTICE OF ADDITIONAL CLOSING STORES (WAVE 3)

Tuesday Morning Corporation and its debtor affiliates, as debtors and debtors-inpossession in the above-referenced chapter 11 cases (collectively, the "<u>Debtors</u>") hereby file this *Debtors' Notice of Additional Closing Stores (Wave 3)* (the "<u>Notice of Additional Closing</u> <u>Stores</u>").

PLEASE TAKE NOTICE that on June 9, 2020, the United States Bankruptcy Court for the Northern District of Texas (the "<u>Court</u>") entered the *Final Order Granting the Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Assume the Consulting Agreement; (II) Approving Procedures for Store Closing Sales; (III) Approving the Sale of Store Closure Assets Free and Clear of All Liens, Claims, and Encumbrances; (IV) Waiving Compliance with Applicable State Laws and Approving Dispute Resolutions Procedures; (V) Approving Procedures to Conduct Sales in Additional Closing Stores; and (VI) Granting Related Relief* [Docket No. 197] (the "<u>Final Store Closing Sales Order</u>").

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: Tuesday Morning Corporation (8532) ("<u>TM Corp.</u>"); TMI Holdings, Inc. (6658) ("<u>TMI Holdings</u>"); Tuesday Morning, Inc. (2994) ("<u>TMI</u>"); Friday Morning, LLC (3440) ("<u>FM LLC</u>"); Days of the Week, Inc. (4231) ("<u>DOTW</u>"); Nights of the Week, Inc. (7141) ("<u>NOTW</u>"); and Tuesday Morning Partners, Ltd. (4232) ("<u>TMP</u>"). The location of the Debtors' service address is 6250 LBJ Freeway, Dallas, TX 75240.

PLEASE TAKE FURTHER NOTICE that, in accordance with the Final Store Closing Sales Order, in the absence of a timely objection the Debtors will be authorized to begin conducting Additional Store Closings at the stores listed in **Exhibit A** attached hereto (the "<u>Wave 3 Stores</u>") in accordance with the terms of the Final Store Closing Sales Order.

PLEASE TAKE FURTHER NOTICE that if no objection to the Notice of Additional Closing Stores is filed by the Additional Closing Store Landlords or any other interested party, including the Committee, within fourteen (14) days after service of this Notice of Additional Closing Stores, the Debtors shall be authorized to begin conducting Additional Store Closings at the Wave 3 Stores.

PLEASE TAKE FURTHER NOTICE, that, as more fully stated in the Final Store Closing Sales Order, the Debtors may remove stores from the list of Wave 3 Stores attached as **Exhibit A** at any time by filing an amendment to the Notice of Additional Closing Stores or an amended Notice of Additional Closing Stores, as applicable.

DATED this 13th day of August, 2020.

HAYNES AND BOONE, LLP

By: <u>/s/ Ian T. Peck</u> Ian T. Peck State Bar No. 24013306 Jarom J. Yates State Bar No. 24071134 Jordan E. Chavez State Bar No. 24109883 **HAYNES AND BOONE, LLP** 2323 Victory Avenue, Suite 700 Dallas, TX 75219 Telephone: 214.651.5000 Facsimile: 214.651.5940 Email: ian.peck@haynesboone.com Email: jarom.yates@haynesboone.com

ATTORNEYS FOR DEBTORS

Store No.	State	Store Address	Landlord
10	ТХ	Blanco Market 18450 Blanco Rd. San Antonio, TX 78258	Richka, LLC 8202 Plum Valley San Antonio, TX 78255
14	TX	Centennial Shopping Center 7301 Burnet Road Suite 300 Austin, TX 78757	Feel the Love Fund, LLC c/o Latipac Property Management, Inc. PO Drawer 162304 Austin, TX 78757
74	ТХ	Hulen Fashion Center 5240 South Hulen Street Fort Worth, TX 76132	Venture Hulen, LP c/o Venture Commercial Management, LLC 4950 N. O'Connor Rd. Suite 202 Irving, TX 75062
90	VA	Smoketown Station 2890 Prince William Pkwy Woodridge, VA 22192	KIR Smoketown Station, LP c/o Kimco Realty Corporation 1954 Greenspring Drive Suite 330 Timonium, MD 21093 KIR Smoketown Station LP c/o Kimco Realty Corporation 500 North Broadway Suite 201 PO Box 9010 Jericho, NY 11753 KIR Smoketown Station LP PO Box 62045 Newark, NJ 07101
91	МО	Tiffany Springs Market Center 8986 NW Skyview Ave Kansas City, MO 64154	Condon Thornton Sladek PLLC Attn: William L. Sladek 8080 Park Lane Suite 700 Dallas, TX 75231
144	NC	Creekside Crossing 404 East Six Forks Road Raleigh, NC 27609	Raleigh Creekside Crossing, LLC c/o Trademark Properties, Inc. 1001 Wade Ave. Suite 300 Raleigh, NC 27605

EXHIBIT A

Store No.	State	Store Address	Landlord
146	NC	Windsor Square Shopping Center 9945 E. Independence Blvd. Matthews, NC 28105-4621	SC Windsor Square, LLC c/o Gregory Moross 340 Royal Poinciana Way Suite 316 Palm Beach, FL 33480
149	ОН	Olentangy Plaza 885 Bethel Rd. Columbus, OH 43214	RPT Realty, L.P. 20750 Civic Center Dr. Suite 310 Southfield, MI 48076
150	ОН	Avery Square 6545 Perimeter Drive Dublin, OH 43016	Dublin Oaks Limited Attn: Legal Dept./Leasing 20750 Civic Center Dr. Suite 310 Southfield, MI 48076
176	СА	23855 Hawthorne Blvd. Torrance, CA 90505	Taylor Properties 106 Lomita Street El Segundo, CA 90245
181	VA	West Springfield Shopping Center 6230 Rolling Road Bays N,O,P West Springfield, VA 22152	Principal Life Insurance Company Attn: Principal Capital Management 711 High Street Des Moines, IA 50392
236	FL	Northdale Promenade 15692 Dale Mabry Hwy Tampa, FL 33618 - 1606	KRG Northdale, LLC c/o Kite Realty Group Attn: Asset Management 30 South Meridian Suite 1100 Indianapolis, IN 46204
270	CA	Castle Square 1901 Camino Ramon #A Danville, CA 94526	Fostoria Associates, LLC c/o Castle Management 12885 Alcosta Blvd. Suite A San Ramon, CA 94583
291	ТХ	Olmos Park Village 3910 Mccollough Avenue # 2 San Antonio, TX 78212	Olmas Park Village Shopping Center, LP c/o Ironwood Real Estate Management 207 San Jacinto Blvd. Suite 300 Austin, TX 78701

Store No.	State	Store Address	Landlord
371	ТХ	The Village at Allen 190 E. Stacy Rd. #1530 Allen, TX 75002	VAA Improvements, LLC c/o DLC Mana Allen 190 East Stacy Rd. Suite 1508 Allen, TX 75002 VAA Improvements, LLC c/o DLC Mana Allen PO Box 840733 Dallas, TX 75284-0733
423	FL	Britton Plaza Shopping Center 3902 Britton Plaza Tampa, FL 33611	Charles J. Bickimer, Trustee c/o Bruce Strumpf, Inc. 2120 Drew Street Clearwater, FL 33765
796	GA	Mall of Georgia C17 1999 Mall of Georgia Blvd., Ste A-200 Buford, GA 30519	Conlaw, LLC 200 Market Place Suite 110 Roswell, GA 30075
928	СО	The Centre on Plum Creek 774 S Perry St. Ste C Castle Rock, CO 80104	Plum Creek Centre, LLC c/o RRI Management, LLC 7800 S. Elati St. Suite 330 Littleton, CO 80120
1005	FL	Nature Coast Commons 1377 Wendy Court Spring Hill, FL 34607-3917	BRE DDR BR Nature Coast FL LLC c/o DDR Corp. Attn: Executive VP – Leasing 3300 Enterprise Parkway Beachwood, OH 44122
1047	PA	Pilgrim Gardens Shopping Center 1043 Pontiac Road Drexel Hill, PA 19026	CW Pilgrim Gardens LP c/o Brixmor Property Group 450 Lexington Avenue 13 th Floor PHIL-1047 New York, NY 10170
1052	FL	Corridors at Ponte Vedra Shopping Center 840 A1A North, Suite 210 Ponte Vedra, FL 32082	Foundry Commercial, LLC Attn: Susan McGuire 121 West Trade Street Suite 2500 Charlotte, NC 28202
1098	TX	5001 Toll Road 183A, Ste J-100 Cedar Park, TX 78613	IVT Parke Cedar Park, LLC Attn: Legal – Leasing & Property Mgmt. 3025 Highland Parkway Suite 350 Downers Grove, IL 60515