

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

In re:)	
)	Chapter 11
)	
Fred's, Inc., <i>et al.</i> , ¹)	Case No. 19-11984 (CTG)
)	
Debtors.)	Jointly Administered
)	
FI Liquidating Trust,)	
)	
Plaintiff,)	
)	
v.)	Adv. Proc. No.: See Exhibit "A"
)	
Defendants Listed on Exhibit "A",)	
)	
Defendants.)	
)	

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON OCTOBER 25, 2021 AT 10:00 A.M. (EASTERN TIME)**

**THERE ARE NO MATTERS GOING FORWARD. ACCORDINGLY, THIS
HEARING IS CANCELED WITH PERMISSION FROM THE COURT.**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Fred's Stores of Tennessee, Inc. (9888); Fred's Inc. (4010); National Equipment Management and Leasing, Inc. (4296); National Pharmaceutical Network, Inc. (9687); Reeves-Sain Drug Store, Inc. (4510); Summit Properties-Jacksboro, LLC (9161); Summit Properties-Bridgeport, LLC (2200); and 505 N. Main Opp, LLC (5850). The mailing address is c/o FI Liquidating Trust, 27 Crimson King Drive, Bear, DE 19701.

ADJOURNED / RESOLVED MATTERS:

1. Debtors' Initial Objection to Proofs of Claims Filed by the State of Mississippi ([D.I. 943](#), filed 3/25/2020)

Objection/Response Deadline: April 8, 2020 at 4:00 p.m. (ET); extended to May 6, 2020 at 4:00 p.m. (ET) for the State of Mississippi.

Objections/Responses Received:

- A. State of Mississippi's Response to Debtors' Initial Objection to Proofs of Claim Filed by the State of Mississippi ([D.I. 1061](#), filed 5/4/2020)

Related Documents: None.

Status: By agreement of the parties, this matter is adjourned to the next omnibus hearing scheduled for December 1, 2021 at 10:00 a.m.

2. Motion for Relief from Automatic Stay to Proceed with State Court Action, filed by Mae Bell Galloway ([D.I. 1172](#), filed 6/9/2020)

Objection/Response Deadline: June 16, 2020 at 4:00 p.m. (ET); extended to seven (7) calendar days before the next omnibus hearing date for the Liquidating Trustee.

Objections/Responses Received: None as of the date hereof.

Related Documents:

- A. Notice of Hearing ([D.I. 1173](#), filed 6/9/2020)

Status: By agreement of the parties, this matter is adjourned to the next omnibus hearing scheduled for December 1, 2021 at 10:00 a.m.

3. Plaintiff's Motion for Orders Establishing Streamlined Procedures Governing Adversary Proceedings Brought by Plaintiff Pursuant to Sections 502, 547, 548, 549 and 550 of the Bankruptcy Code ([D.I. 1569](#), filed 9/28/2021)

Objection/Response Deadline: October 12, 2021 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents:

- A. Certificate of No Objection Regarding Plaintiff's Motion for Orders Establishing Streamlined Procedures Governing Adversary Proceedings Brought by Plaintiff Pursuant to Sections 502, 547, 548, 549 and 550 of the Bankruptcy Code ([D.I. 1578](#), filed 10/18/2021)

- B. Order Establishing Streamlined Procedures Governing Adversary Proceedings with Total in Controversy Less Than or Equal to \$75,000.00 Brought by Plaintiff Pursuant to Sections 502, 547, 548, 549 and 550 of the Bankruptcy Code ([D.I. 1582](#), entered 10/19/2021)
- C. Order Establishing Streamlined Procedures Governing Adversary Proceedings with Total in Controversy Greater Than \$75,000.00 Brought by Plaintiff Pursuant to Sections 502, 547, 548, 549 and 550 of the Bankruptcy Code ([D.I. 1585](#), entered 10/20/2021)

Status: The Court has entered Orders with respect to this matter. No hearing is necessary.

- 4. Liquidating Trustee's Third Motion to Extend the Claims Objection Deadline ([D.I. 1571](#), filed 10/4/2021)

Objection/Response Deadline: October 18, 2021 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents:

- A. Certificate of No Objection Regarding Liquidating Trustee's Third Motion to Extend the Claims Objection Deadline ([D.I. 1584](#), filed 10/20/2021)
- B. Third Order Extending the Claims Objection Deadline ([D.I. 1595](#), entered 10/21/2021)

Status: The Court has an entered Order with respect to this matter. No hearing is necessary.

PRETRIAL CONFERENCE IN ADVERSARY PROCEEDINGS:

- 5. Pretrial Conference in Adversary Proceedings

Status: Pursuant to the Orders Establishing Streamlined Procedures Governing Adversary Proceedings entered on October 19, 2021 [D.I. 1582 and 1585], the pretrial conference in the above-captioned adversary proceedings has been waived. No hearing is necessary.

Dated: October 21, 2021
Wilmington, Delaware

WOMBLE BOND DICKINSON (US) LLP

/s/ Ericka F. Johnson

Matthew P. Ward, Esq. (No. 4471)
Ericka F. Johnson, Esq. (No. 5024)
1313 North Market Street, Suite 1200
Wilmington, Delaware 19801
Telephone: (302) 252-4320
Facsimile: (302) 252-4330
E-mail: matthew.ward@wbd-us.com
ericka.johnson@wbd-us.com

-AND-

LOWENSTEIN SANDLER LLP

Jeffrey L. Cohen, Esq. (admitted *pro hac vice*)
Lindsay H. Sklar, Esq. (admitted *pro hac vice*)
1251 Avenue of the Americas
New York, New York 10020
Telephone: (212) 262-6700
Facsimile: (212) 262-7402
Email: jcohen@lowenstein.com
lsklar@lowenstein.com

Nicole Fulfree, Esq. (admitted *pro hac vice*)
Jeremy D. Merkin, Esq. (admitted *pro hac vice*)
Colleen M. Maker, Esq. (admitted *pro hac vice*)
One Lowenstein Drive
Roseland, New Jersey 07068
Telephone: (973) 597-2502
Facsimile: (973) 597-2400
Email: nfulfree@lowenstein.com
jmerkin@lowenstein.com
cmaker@lowenstein.com

-AND-

ASK LLP

Joseph L. Steinfeld, Jr., Esq. (admitted *pro hac vice*)
Kara E. Casteel, Esq. (admitted *pro hac vice*)
2600 Eagan Woods Drive, Suite 400
St. Paul, Minnesota 55121
Telephone: (651) 289-3846
Facsimile: (651) 406-9676
Email: kcasteel@askllp.com

Edward E. Neiger, Esq.
60 East 42nd Street, 46th Fl.
New York, New York 10165
Telephone: (212) 267-7342
Facsimile: (212) 918-3427

-AND-

CONNOLLY GALLAGHER LLP **

/s/ N. Christopher Griffiths
N. Christopher Griffiths (No. 5180)
Lisa Hatfield (No. 4967)
1201 North Market Street, 20th Floor
Wilmington, Delaware 19801
Telephone: (302) 888-6313
Email: cgriffiths@connollygallagher.com
lhatfield@connollygallagher.com

*Co-Counsel to the Liquidating Trustee and
the FI Liquidating Trust*

EXHIBIT A

Defendant Name	Adversary Number
3Cloud, LLC	21-51044
A & C Business Enterprises LLC	21-51047
Alco Manufacturing Company	21-51049
Alere Toxicology Services, Inc.	21-51051
All American Security & Service	21-51054
ARC Realty, LLC	21-51055
ateb, Inc.	21-51056
Audio Architex Inc.	21-51057
Avaneesh Enterprises	21-51059
BDO USA, LLP aka BDO Siedman	21-51061
Benjamin Ray Skinner dba All-Star Security Services	21-51035
Buffalo Rock Company	21-51036
Buffalo Rock Distribution Company, L.L.C.	21-51063
C.H. Robinson Company Inc.	21-51065
Caplin & Drysdale, Chartered	21-51096
CBRE Capital Markets, Inc.	21-51097
Clarion Security LLC	21-51101
Clark Beverage Group, Inc. dba Clark Beverage Corp.	21-51105
David Coyt Majure	21-51114
Dippin' Dots, L.L.C.	21-51116
Duffy Box & Recycling, Inc. dba Box Resellers	21-51120
Echelon Solutions Group LLC	21-51122
Ecolab Inc. **	21-51086
Engie Insight Services Inc.	21-51124
eRx Network, LLC	21-51125
Family Four Construction Inc.	21-51127
FGX International Inc.	21-51038
GlaxoSmithKline LLC **	21-51083
Grant Thornton LLP	21-51132
H2 Holdings, LLC dba Asylas	21-51128
Haddad Associates, Inc. dba Gateway Group Personnel	21-51040
Hallmark Marketing Company, LLC	21-51129
Hogan Dedicated Services, LLC	21-51130
Hogan Logistics, Inc.	21-51131
Hot Graphics & Printing, Inc.	21-51136
Hughes Network Systems, LLC	21-51138
InComm Healthcare & Affinity, Inc.	21-51141
Interactive Communications International, Inc. dba InComm	21-51043

Defendant Name	Adversary Number
Interface Security Systems, L.L.C.	21-51144
International Cotton Depots, Inc.	21-51147
J & D Resources, Inc. dba JDResources, Inc.	21-51041
JMJ Phillip Group, LLC	21-51149
K.W. Textile, Inc.	21-51153
Kentwood Land, LLC	21-51042
Konica Minolta Business Solutions U.S.A., Inc. dba Konica Minolta Premier Finance	21-51155
Kraft Heinz Foods Company dba Kraft Foods	21-51156
Lewisburg Printing LLC	21-51157
Loyalty Lane, Inc.	21-51158
Magic Video, Inc.	21-51045
Manthan Systems Inc.	21-51159
Marketing by Design LLC	21-51134
Marketouch Media, Inc.	21-51135
Mars PetCare US Inc.	21-51137
Meltzer, Purtill & Stelle LLC	21-51140
Mercer Health & Benefits LLC	21-51142
Michaels Stores, Inc. dba Michaels	21-51143
MTI Digital Inc.	21-51145
NASDAQ, Inc.	21-51146
Oldcastle Lawn & Garden, Inc.	21-51150
OrderInsite, LLC	21-51152
Orkin, LLC	21-51154
Parata Systems, LLC	21-51121
Pfizer, Inc.	21-51123
Pinnacle Propane Express, LLC	21-51048
PJ Solomon Securities, LLC	21-51058
Prairie Farms Dairy, Inc.	21-51050
Premium Waters, Inc.	21-51060
PRGX USA, Inc.	21-51062
Pridestaff, Inc.	21-51064
R & M Joint Venture, LLC	21-51133
RE Transportation, Inc.	21-51066
Rebox Corp	21-51067
Red River Commodities, Inc.	21-51068
Reddy Ice LLC	21-51069
Refresco Beverages US Inc. dba Cott Beverages Inc.	21-51070
Republic Services, Inc.	21-51071

Defendant Name	Adversary Number
Richter Consulting Inc.	21-51072
RSUI Group, Inc	21-51052
S.C. Johnson & Son, Inc.	21-51073
Scriptcycle, LLC	21-51074
Securitas Security Services USA, Inc.	21-51075
SHI International Corp.	21-51076
SJT Enterprises, Inc.	21-51077
SMS Assist, L.L.C.	21-51078
Southern Telecom, Inc. fdba AIT International Inc.;	
and Rosenthal & Rosenthal, Inc. **	21-51089
SP National Management LLC fdba Strategic Partner LLC	21-51079
Spectrum Brands, Inc.	21-51080
Staffmark Investment LLC	21-51081
Sterling Building Specialists Inc.	21-51082
Stratus Unlimited LLC fdba MC Sign LLC	21-51085
Tableau Software, LLC	21-51087
Telapex, Inc. dba C Spire	21-51088
Telepak Networks, Inc. dba C Spire Fiber	21-51090
The Quaker Oats Company	21-51092
The Terminix International Company Limited Partnership	21-51093
The Wholesale Group L.L.C.	21-51094
Tom Bell Fire Equipment, LLC	21-51095
TripActions, Inc.	21-51099
Trustwave Holdings, Inc.	21-51100
TSG Enterprises, LLC dba RadiusPoint	21-51102
Turner Dairy Farms, Inc.	21-51103
U.S. Alliance Paper, Inc.	21-51104
United Parcel Service, Inc. dba UPS	21-51106
Universal Charge Accounts, Inc.	21-51108
U-Play USA, LLC aka U-Play Corporation	21-51109
UTZ Quality Foods, Inc.	21-51111
VaxServe, Inc.	21-51112
Warren Oil Company, LLC	21-51115
Washington Inventory Service, Inc.	21-51117
Waste Management, Inc.	21-51053
Working Solutions of Memphis, LLC	21-51118
Yash Technologies, Inc.	21-51119