

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

In re:

PACKABLE HOLDINGS, LLC F/K/A  
ENTOURAGE COMMERCE, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-10797 (CTG)

(Jointly Administered)

**Re: D.I. 10, 55, and 94**

**SUPPLEMENTAL DECLARATION OF SARAH BAKER IN SUPPORT OF MOTION OF  
DEBTORS FOR INTERIM AND FINAL ORDERS (I)(A) CONFIRMING, ON AN INTERIM  
BASIS, THAT THE INVENTORY DISPOSITION AGREEMENT IS OPERATIVE AND  
EFFECTIVE AND (B) AUTHORIZING, ON A FINAL BASIS, THE DEBTORS TO ASSUME  
THE INVENTORY DISPOSITION AGREEMENT; (II) AUTHORIZING AND APPROVING  
INVENTORY AND FF&E SALES FREE AND CLEAR OF ALL LIENS, CLAIMS,  
AND ENCUMBRANCES; AND (III) GRANTING RELATED RELIEF**

I, Sarah Baker, hereby declare under penalty of perjury that the following is true to the best of my knowledge, information and belief:

1. I am Vice President, Deputy General Counsel of Hilco Trading, LLC (“Hilco Trading”), the ultimate parent company of Hilco Merchant Resources, LLC (“Hilco”), located at 5 Revere Drive, Suite 206, Northbrook, Illinois.

2. I submit this supplemental declaration (the “Supplemental Declaration”) on behalf of Hilco in support of the *Motion of Debtors for Interim and Final Orders (I)(A) Confirming, on an Interim Basis, that the Inventory Disposition Agreement is Operative and Effective and (B) Authorizing, on a Final Basis, the Debtors to Assume the Inventory Disposition*

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number include: Packable Holdings, LLC (6932); Greenpharm Ventures LLC (1513); Packable Media, LLC (6006); Pharmapacks, LLC (6676); Packable Ventures, LLC (1172); and Access Brands, LLC (8582). The location of the Debtors’ service address in these chapter 11 cases is 1985 Marcus Avenue, Suite 207, Lake Success, NY 11042.

*Agreement; (II) Authorizing and Approving Inventory and FF&E Sales Free and Clear of all Liens, Claims, and Encumbrances; and (III) Granting Related Relief (D.I. 10) (the “Motion”).*

3. On September 19, 2022, the *Declaration of Sarah Baker in Support of Motion of Debtors for Interim and Final Orders (I)(A) Confirming, on an Interim Basis, That the Inventory Disposition Agreement is Operative and Effective and (B) Authorizing, on a Final Basis, the Debtors to Assume the Inventory Disposition Agreement; (II) Authorizing and Approving Inventory and FF&E Sales Free and Clear of All Liens, Claims, and Encumbrances; and (III) Granting Related Relief (D.I. 94) (the “Original Declaration”)* was filed in support of the Motion

4. The facts set forth in this Supplemental Declaration are based upon my personal knowledge, information, and belief, and upon records kept in the ordinary course of business that were reviewed by me or other employees of Hilco Trading under my supervision and direction. If called as a witness, I would testify to the facts set forth in this Supplemental Declaration.

5. In the ordinary course of its business, Hilco Trading, Hilco and its affiliates and subsidiaries (collectively, “Hilco Global”) maintain a database (the “Transaction Database”) for purposes of performing “conflicts checks.” The Transaction Database contains information regarding present and past representations and transactions of Hilco Global. I obtained a list of names of individuals and companies provided by the Debtors for purposes of searching the Transaction Database and determining the connection(s) which Hilco Global has with such entities (attached to the Original Declaration as Schedule 1; collectively, the “Parties in Interest”). Hilco ran the names of all of the Parties in Interest through the Transaction Database to determine whether Hilco Global had in the past, or currently has, any connection to such Parties in Interest. The Transaction Database includes information relating to debt and equity holdings of the entities

comprising Hilco Global (including debt and equity holdings by such entities for the account of a third party, if any). In short, if one of the entities comprising Hilco Global holds debt or equity in a Party in Interest, that connection would be identified in the conflicts check and disclosed. Moreover, the conflicts check conducted by Hilco in connection with the Motion, the Original Declaration and this Supplemental Declaration did not exclude any affiliates of Hilco or its ultimate parent company. Hilco's search of the Transaction Database identified the connections listed on and described in Schedule 2 attached to the Original Declaration.

6. I am submitting this Supplemental Declaration to (i) update Schedule 1 to the Original Declaration to include additional parties as reflected in **Schedule 1**<sup>2</sup> attached hereto, which is a cumulative list of all parties in interest searched by Hilco either as part of the Original Declaration or this Supplemental Declaration; and (ii) make additional disclosures and update certain of the connections listed in Schedule 2 to the Original Declaration as follows:

- a. Pursuant to the Streambank Retention Application, filed on October 5, 2022, the Debtors have engaged Hilco IP Services, LLC d/b/a Hilco Streambank ("Hilco Streambank"), an affiliate of Hilco, as the Debtors' intellectual property disposition consultant. Hilco has no ownership interest in Hilco Streambank, does not share officers or directors with Hilco Streambank, and maintains separate books, records, and financial statements and accounts.
- b. In addition to the disclosures contained in my Original Declaration, Hilco provides asset monetization and disposition services to Target in matters wholly unrelated to the Debtors and these chapter 11 cases.
- c. In addition to the disclosures contained in my Original Declaration, from time to time, Hilco and its affiliates have worked with and/or been represented by (i) Latham & Watkins LLP, (ii) Arent Fox LLP, (iii) Holland

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<sup>2</sup> Hilco searched additional parties at the request of the Debtors and also in light of the *Application of Debtors for Entry of an Order (I) Authorizing the Retention and Employment of Hilco IP Services, LLC d/b/a Hilco Streambank as Intangible Assets Disposition Consultant to the Debtors, Effective as of September 16, 2022; (II) Waiving Certain Information Requirements of Local Rule 2016-2; and (III) Granting Related Relief* (D.I. 142) (the "Streambank Retention Application"), which was filed on October 5, 2022.

& Knight LLP, and (iv) Morris Nichols Arsht & Tunnell LLP, in matters wholly unrelated to the Debtors and these chapter 11 cases.

7. Hilco is conducting further inquiries regarding Hilco's engagement by any creditors of the Debtors, and upon conclusion of that inquiry, or at any time during the period of Hilco's engagement if Hilco should discover any facts bearing on the matters described herein, Hilco will supplement the information contained in this Supplemental Declaration.

*[Remainder of page intentionally left blank]*

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: Northbrook, Illinois  
October 6, 2022

**Hilco Merchant Resources, LLC**

By:   
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Sarah Baker  
Vice President & Deputy General Counsel,  
Managing Member

**Schedule 1**

**Parties In Interest List**

**Bankruptcy Judges**

Judge Ashely M. Chan  
Judge Brendan L. Shannon  
Judge Craig T. Goldblatt  
Judge J. Kate Stickles  
Judge John T. Dorsey  
Judge Karen B. Owens  
Judge Laurie Selber Silverstein  
Judge Mary F Walrath

**Bankruptcy Professionals**

Alvarez & Marsal LLC  
Cooley LLP  
Epiq Global  
Greenhill & Co.  
Hilco Global  
Latham & Watkins LLP  
Morgan, Lewis & Bockius LLP  
Potter Anderson & Corroon LLP

**Bankruptcy Judges Staff**

Laura Haney  
Robert Cavello

**Debtors**

Access Brands, LLC  
Greenpharm Ventures LLC  
Packable Holdings, LLC  
Packable Media, LLC  
Packable Ventures, LLC  
Pharmapacks, LLC (dba Packable)

**Director/Officers**

Adam Berkowitz  
Adam Rodgers  
Andreas Schulmeyer  
Andrew Vagenas  
Arjun Purkayastha  
Ash Mehra  
Brad Tramunti  
Carrie Williams  
Chris Pfeiffer  
Daniel Bennett  
Daniel Meyers  
Daren Davis Nastase  
Glenn Nussdorf

Ian Cohen  
James Mastronardi  
Jay Sammons  
Karen (Sunny) Nastase  
Leanna Bautista  
Maria Harris  
Neal Goldman  
Scott Emerson  
Yue Bonnet

**Equity Holder**

62 Castle Ridge LLC  
Adam Berkowitz  
Jonathan Webb  
Milend LLC  
P&G 610 LLC  
PPJDM LLC  
Quality King Distributors, Inc.  
The Bryn Mawr Trust Company of  
Delaware

**Insurance**

**Known Affiliates – JV**

1516 Media Group, LLC  
CASA Home, LLC  
Little Yawn Collective, LLC  
Pacific Shaving Company  
Pharmapacks Brand Holdings, LLC  
Theraplex, LLC

**Landlord**

1516 MP, LLC  
80 Wilshire Blvd., LLP  
BDG 1516 MP, LLC  
CH/BDG Harvill, LLC  
CK-HP 1985 Marcus Avenue LLC  
Edgewater Industrial Park, LLC  
Feiga Holly Hall/1985 Marcus Avenue LLC  
FKA Urban Engineers of New York P.C.  
Quality King Distributors, Inc.  
Urban Engineers of New York D.P.C. f/k/a  
Urban Engingeers of New York P.C.

**Leases**

FreshGogo, Inc.

MGG Investment Group LP

**Banks/Lender/UCC Lien Parties**

62 Castle Ridge LLC  
Aditya Sehgal  
AJZ Windmill  
Alexis Peribere  
Altaheide  
Alter Domus (US) LLC  
Bank of America  
Baptiste Peribere  
Carlyle (Pacer Corp. Blocker)  
Carlyle (Pacer Holdings)  
Carlyle (Pacer L.P. Blocker)  
CVI Investment Management  
David Wolkoff  
Elodie Goullin  
Fidelity  
George Klidonas  
Gioia Ventures  
Glenn M Creamer  
Gribovo Holdings  
Heights Capital Management  
Jeffrey Schwartzberg  
Jerome Peribere  
JFMW Capital  
John Arnold  
John Pashalis  
Jonathan Webb  
JPMorgan Chase Bank  
Lombard Odier  
Luxor Capital  
Mason Capital Partners, LLC  
McKesson Ventures  
MGG Investment Group LP  
Michael Dolianitis  
Morningside  
Palmieri Ventures Holdings LLC  
Park West  
Peter Wyman  
PF4 Ventures LLC  
PG Properties of Queens LLC  
Quality King  
Rajiv Chandra  
Reckitt Benckiser Group PLC  
Rob de Groot

Roland Hysenaj  
Romane De Cidrac  
Shanklin Corporation  
Stan Ades  
TAB 710 Holdings  
The Poses Family Foundation  
Thibault De Cidrac  
Valley National Bank

**Legal Matters**

4X Commerce, LLC dba MyFBAPrep  
Raymond Handling Solutions Inc.

**Other Interested Parties**

FreshGogo, Inc.  
Kroger  
MGG Investment Group LP  
Shopify  
Target  
Walmart

**Taxing Authorities**

**Top 30 Creditors**

Altaheide LLC  
CVI Investments, Inc.  
Glenn M. Creamer Associates II LP  
Gribovo Holdings LLC  
Highland Transcend Partners I Corp.  
LO Global Private Assets Fund  
Luxor Capital Group LP  
MTVL, LLC  
Richard King Mellon Foundation

**US Trustee**

Angelique Okita  
Benjamin Hackman  
Christine Green  
David Buchbinder  
Denis Cooke  
Diane Giordano  
Dion Wynn  
Edith A. Serrano  
Hannah M. McCollum  
Holly Dice  
James R. O'Malley



Jane Leamy  
Joseph Cudia  
Joseph McMahon  
Juliet Sarkessian  
Lauren Attix  
Linda Casey  
Linda Richenderfer  
Michael Panacio  
Nyanquoi Jones  
Ramona Harris  
Richard Schepacarter  
Rosa Sierra-Fox  
Shakima L. Dortch  
Timothy J. Fox, Jr.

### **Utilities**

### **Vendors**

3M Company  
4X Commerce LLC (My Fba Prep)  
80 Wilshire Blvd., LLP  
Active Nutrition (Natures Bounty)  
Adecco USA Inc  
American International Services LLC  
Amerisourcebergen Drug Corp. (H.D.Smith)  
Arent Fox LLP  
Bayer Healthcare LLC  
Beyond Technologies Consulting USA  
Bi-Lo Distributors Ltd  
Blackhawk Data LLC  
BOFA Securities, Inc.  
Breacham Group, LLC  
Capital One Bank USA  
Carbonklean LLC  
CCA Financial LLC  
CFGH Holdings, LLC  
Chubb Insurance  
Church & Dwight Co. Inc.  
Citibank  
Cosmopolitan Cosmetics Inc  
Data Sales Co., Inc.  
De Lage Landen Financial  
Deloitte & Touche LLP  
DLA Piper LLP (US)  
Endicia  
Epam Systems, Inc.

Ethique Limited  
Fox Rothschild LLC  
GSK Consumer Healthcare Services Inc.  
Holland & Knight LLP  
Hub International (the B&G Group)  
Infosys Limited  
Jacavi Beauty LLC  
Johnson & Johnson Consumer Inc  
Kinray Inc.  
Korber Supply Chain Us, Inc. (Highjump)  
Maesa Holdings Inc. (Kristin Ess)  
Mastercard  
Mckesson Medical  
Mead Johnson & Company LLC  
Medtech Products, Inc. (Prestige)  
Mintz Levin Cohn Ferris Glovsky & Popeo  
PC  
Monarca Maintenance Corp  
Morgan Lewis & Bockius LLP  
Morris Nichols Tunnell LLP  
MTBC Ltd (TBC Enterprises)  
Nimble Gravity LLC  
Perfume Worldwide Inc  
Pro's Choice Beauty Care  
Quality Fragrance  
Quality King Distributors  
Randstad Us, LLC  
RB Health(US) LLC  
RB Hyho  
Right Management Inc  
Sap America, Inc.  
Scrub Daddy Inc.  
Sheralven Enterprises Ltd  
Staples  
Sunstar Americas Inc. (Gum Brand)  
Supplyone Long Island  
The B&G Group  
The Benchmark Company LLC  
Thornel Associates, Inc.  
Tradeswell Inc.  
Ultra/Standard Dist  
United Healthcare  
United Parcel Service  
UPS Mail Innovations  
US Bank National Association