

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

In re:

YELLOW CORPORATION, *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 23-11069 (CTG)
)
) (Jointly Administered)
)
)

DEBTORS' WITNESS & EXHIBIT LIST
FOR HEARING ON APRIL 18, 2024 AT 12:00 P.M. (ET)

The above-captioned debtors and debtors in possession (the “Debtors”) hereby submit this witness and exhibit list in connection with the hearing scheduled for **April 18, 2024, at 12:00 p.m. (ET)**, before the Honorable Craig T. Goldblatt, at the United States Bankruptcy Court for the District of Delaware, located at 824 N. Market Street, 3rd Floor, Courtroom No. 7, Wilmington, Delaware 19801 (the “Hearing”), at which time the following motion (the “Motion”) is currently scheduled to be heard:²

1. *Debtors’ Omnibus Motion for Entry of An Order (I) Authorizing the Debtors to Assume Certain Unexpired leases and (II) Granting Related Relief* [Dkt. No. 2157]

WITNESSES

The Debtors will call Cody Kaldenberg to testify concerning the topics in her declaration (Dkt. No. 2202). The Debtors will call Brian Whittman to testify concerning the topics in his declaration (Dkt. No. 2201).

1 A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of the Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

2 Many lift stay movants have agreed to continue their motions and others may also agree between the filing of this pleading and the hearing on January 22, 2024.

The Debtors reserve the right to question any witness included on any other parties witness list.

The Debtors reserve the right to call any witness necessary to lay foundation or for rebuttal.

EXHIBITS

The Debtors designate the following exhibits that may be used at the Hearing in connection with the Motion:

Exhibit No.	Document Description	ECF No.
1	Secured Claims Analysis - As of 03/26/2024 [YELLOW-ASSUMPTION 00019968]	
2	Yellow Corporation Intercompany Receivable / (Payable) Matrix [YELLOW-ASSUMPTION 00019968]	
3	Yellow - Leased Properties Overview as of 4/1/2024 [YELLOW-ASSUMPTION 00020003]	
4	CTRL_REV00000840 - Brian Whitman Cashflow Forecast [YELLOW-ASSUMPTION_00020004]	
5	Whittman Declaration	2201
6	Kaldenberg Declaration	2202
7	Whittman Supplemental Declaration	2370
8	Lease Comparable 1 for 51st St., Phoenix, AZ [FINLAYSON-000122]	
9	Lease For 51st St., Phoenix, AZ [FINLAYSON-000123]	
10	Memorandum of 51st St., Phoenix, AZ Lease [FINLAYSON-000148]	
11	Certificate of Liability Insurance 1 for 2021 S 51st Ave., Phoenix, AZ [YELLOW-ASSUMPTION 00000875]	
12	Certificate of Liability Insurance 2 for 2021 S 51st Ave., Phoenix, AZ [YELLOW-ASSUMPTION_00000913]	
13	Certificate of Liability Insurance 3 for 2021 S 51st Ave., Phoenix, AZ [YELLOW-ASSUMPTION_00000939]	

Exhibit No.	Document Description	ECF No.
14	First Amendment to Lease for 14700 Smith Rd. Aurora, CO [REA0000066600]	
15	Lease Agreement for 14700 Smith Rd. Aurora, CO [REA0000066613]	
16	Second Amendment to Lease for 14700 Smith Rd., Aurora, CO [REA0000066638]	
17	Letter re Lease Amendment for 14700 Smith Rd., Aurora, CO [REA0000066646]	
18	Certificate of Liability Insurance 1 for 14700 Smith Rd., Aurora, CO [YELLOW-ASSUMPTION 00000868]	
19	Certificate of Liability Insurance 2 for 14700 Smith Rd., Aurora, CO [YELLOW-ASSUMPTION 00000907]	
20	Certificate of Liability Insurance 3 for 14700 Smith Rd., Aurora, CO [YELLOW-ASSUMPTION 00000935]	
21	Lease Agreement for 28 Sterling Rd., Billerica, MA [REA0000066648]	
22	Letter re Extension of Lease for 28 Sterling Rd., Billerica, MA [RAE0000066673]	
23	Certificate of Liability Insurance 1 for 28 Sterling Rd., Billerica, MA [YELLOW-ASSUMPTION 00000881]	
24	Certificate of Liability Insurance 2 for 28 Sterling Rd., Billerica, MA [YELLOW-ASSUMPTION 00000917]	
25	Certificate of Liability Insurance 3 for 28 Sterling Rd., Billerica, MA [YELLOW-ASSUMPTION 00000942]	
26	Lease Agreement for 18298 Slover Ave., Bloomington, CA [RAE0000066674]	
27	Letter re Extension of Lease for 18398 [sic] Slover Ave., Bloomington, CA [REA0000066699]	
28	Certificate of Liability Insurance 1 for 18298 Slover Ave., Bloomington, CA [YELLOW-ASSUMPTION 00000870]	
29	Certificate of Liability Insurance 2 for 18298 Slover Ave., Bloomington, CA [YELLOW-ASSUMPTION 00000909]	
30	Certificate of Liability Insurance 3 for 18298 Slover Ave., Bloomington, CA [YELLOW-ASSUMPTION 00000936]	
31	Lease Agreement for 12340 Northwest Hwy, Garland, TX [REA0000066700]	

Exhibit No.	Document Description	ECF No.
32	Letter re Lease Amendment for 12340 Northwest Hwy, Garland, TX [REA000066722]	
33	Letter re Extension of Lease for 12340 Northwest Hwy, Garland, TX [REA0000066724]	
34	Certificate of Liability Insurance 1 for 12340 Northwest Hwy, Garland, TX [YELLOW-ASSUMPTION_00000862]	
35	Certificate of Liability Insurance 2 for 12340 Northwest Hwy, Garland, TX [YELLOW-ASSUMPTION_00000903]	
36	Certificate of Liability Insurance 3 for 12340 Northwest Hwy, Garland, TX [YELLOW-ASSUMPTION_00000932]	
37	Amendment to Lease Agreement for 3500 Booth St., Kansas City, MO [REA0000066727]	
39	Lease Agreement for 2500 Booth St., Kansas City, MO [REA0000066731]	
40	Letter re Lease Amendment for 2500 Booth St., Kansas City, MO [REA0000066754]	
41	Second Amendment to Lease Agreement for 3500 Booth St., Kansas City, MO	
42	Certificate of Liability Insurance 1 for 3500 Booth St., Kansas City, MO [YELLOW-ASSUMPTION_00000884]	
43	Certificate of Liability Insurance 2 for 3500 Booth St., Kansas City, MO [YELLOW-ASSUMPTION_00000919]	
44	Certificate of Liability Insurance 3 for 3500 Booth St., Kansas City, MO [YELLOW-ASSUMPTION_00000928]	
45	Certificate of Liability Insurance 4 for 3500 Booth St., Kansas City, MO [YELLOW-ASSUMPTION_00000944]	
46	First Amendment to Lease Agreement for 19604 84th St., Kent, WA [REA0000066870]	
47	Lease Agreement for 19604 84th St., Kent, WA [REA0000066822]	
48	Second Amendment to Lease Agreement for 19604 84th St., Kent, WA [REA0000066848]	
49	Certificate of Liability Insurance 1 for 19604 84th St., Kent, WA [YELLOW-ASSUMPTION_00000872]	
50	Certificate of Liability Insurance 2 for 19604 84th St., Kent, WA [YELLOW-ASSUMPTION_00000911]	

Exhibit No.	Document Description	ECF No.
51	Certificate of Liability Insurance 3 for 19604 84th St., Kent, WA [YELLOW-ASSUMPTION_00000937]	
52	Lease Agreement for 10451 Colonel Ct., Manassas, VA [REA0000066859]	
53	Letter re Extension of Lease for 10451 Colonel Ct., Manassas, VA [REA0000066884]	
54	Certificate of Liability Insurance 1 for 10451 Colonel Ct., Manassas, VA [YELLOW-ASSUMPTION_00000890]	
55	Certificate of Liability Insurance 2 for 10451 Colonel Ct., Manassas, VA [YELLOW-ASSUMPTION_00000898]	
56	Certificate of Liability Insurance 3 for 10451 Colonel Ct., Manassas, VA [YELLOW-ASSUMPTION_00000947]	
57	Lease Agreement for 9933 Beverly Blvd., Pico Rivera, CA [REA0000066885]	
58	Certificate of Liability Insurance 1 for 9933 Beverly Blvd., Pico Rivera, CA [YELLOW-ASSUMPTION_00000896]	
59	Certificate of Liability Insurance 2 for 9933 Beverly Blvd., Pico Rivera, CA [YELLOW-ASSUMPTION_00000875]	
60	Certificate of Liability Insurance 3 for 9933 Beverly Blvd., Pico Rivera, CA [YELLOW-ASSUMPTION_00000949]	
61	Lease for 1130 Reservoir St., Pomona, CA [REA0000066917]	
62	Letter re Transition of Administration of 1130 Reservoir St, Pomona, CA [REA0000066945]	
63	Certificate of Liability Insurance 1 for 1130 Reservoir St., Pomona, CA [YELLOW-ASSUMPTION_00000858]	
64	Certificate of Liability Insurance 2 for 1130 Reservoir St., Pomona, CA [YELLOW-ASSUMPTION_00000900]	
65	Certificate of Liability Insurance 3 for 1130 Reservoir St., Pomona, CA [YELLOW-ASSUMPTION_00000930]	
66	Lease Agreement for 6930 Cactus Ct., San Diego, CA [REA0000066946]	
67	Letter re Extension of Lease for 6930 Cactus Ct., San Diego, CA [REA0000066969]	
68	Certificate of Liability Insurance 1 for 6930 Cactus Ct., Chula Vista, CA [YELLOW-ASSUMPTION_00000890]	

Exhibit No.	Document Description	ECF No.
69	Certificate of Liability Insurance 2 for 6930 Cactus Ct., Chula Vista, CA [YELLOW-ASSUMPTION 00000898]	
70	Certificate of Liability Insurance 3 for 6930 Cactus Ct., Chula Vista, CA [YELLOW-ASSUMPTION 00000947]	
71	Assignment and Assumption of Lease for 9801 Palm River Rd., Tampa, FL [REA0000066970]	
72	First Amendment to least Agreement for 9801 Palm River Rd., Tampa, FL [REA0000066973]	
73	Lease Agreement for 9801 Palm River Rd., Tampa, FL [REA0000066975]	
74	Letter re Extension of Lease for 9801 Palm River Rd., Tampa, FL [REA0000067008]	
75	Certificate of Liability Insurance 1 for 9801 Palm River Rd., Tampa, FL [YELLOW-ASSUMPTION 00000894]	
76	Certificate of Liability Insurance 2 for 9801 Palm River Rd., Tampa, FL [YELLOW-ASSUMPTION 00000923]	
77	Certificate of Liability Insurance 3 for 9801 Palm River Rd., Tampa, FL [YELLOW-ASSUMPTION 00000950]	
78	Letter of Intent for 700 Dell Rd., Carlstadt, NJ [TERRENO-000003]	
79	Certificate of Liability Insurance 1 for 700 Dell Rd., Carlstadt, NJ [YELLOW-ASSUMPTION 00000892]	
80	Certificate of Liability Insurance 2 for 700 Dell Rd., Carlstadt, NJ [YELLOW-ASSUMPTION 00000921]	
81	Certificate of Liability Insurance 3 for 700 Dell Rd., Carlstadt, NJ [YELLOW-ASSUMPTION 00000948]	
82	Letter re Proposal of Lease for 25555 Clawiter Rd., Hayward, CA [TERRENO-000006]	
83	Terreno Dell YRC Buyout Analysis, prepared January 23, 2024 [TERRENO-000013]	
84	Excel spreadsheet, Clawiter Analysis [TERRENO-000015]	
85	Certificate of Liability Insurance 1 for 25555 Clawiter Rd., Hayward, CA [YELLOW-ASSUMPTION 00000879]	
86	Certificate of Liability Insurance 2 for 25555 Clawiter Rd., Hayward, CA [YELLOW-ASSUMPTION 00000916]	

Exhibit No.	Document Description	ECF No.
87	Certificate of Liability Insurance 3 for 25555 Clawiter Rd., Hayward, CA [YELLOW-ASSUMPTION_00000941]	
88	CBRE Yellow Portfolio Optimization CBRE Presentation [YELLOW-ASSUMPTION_00020032]	
89	Excel spreadsheet, Yellow – Leased Properties [YELLOW-ASSUMPTION_00019967]	
90	Amended Notice of Deposition to Realterm Landlords Pursuant to Fed. R. Civ. P. 30(b)(6)	2928
91	Amended Notice of Deposition to Finlayson Landlords Pursuant to Fed. R. Civ. P. 30(b)(6)	2862
92	Brian Roach Deposition Transcript, dated April 8, 2024	
93	Victor Cirrincione Deposition Transcript, dated April 12, 2024	

The Debtors reserve the right to use any exhibit listed by any other party. The Debtors also reserve the right to amend, shorten, or supplement this witness and exhibit list prior to the Hearing.

Dated: April 16, 2024
Wilmington, Delaware

/s/ Laura Davis Jones

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