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Proposed Counsel to Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

SAM ASH MUSIC CORPORATION, *et al.*

Debtors.¹

Chapter 11

Case No. 24-14727 (SLM)

(Jointly Administered)

**NOTICE OF AMENDED² AGENDA OF MATTERS SCHEDULED
TO BE HEARD ON JUNE 5, 2024 AT 10:00 A.M. (ET)**

To: All Parties Receiving Electronic Notification of Filing
via the Court's CM/ECF System

PLEASE TAKE NOTICE that the following matters are currently scheduled to be heard
on June 5, 2024 at 10:00 a.m. (prevailing Eastern Time) before the Honorable Judge Stacey L.
Meisel:

¹ The debtors in these chapter 11 cases, along with the last four digits of each debtor's federal tax identification number, are: Sam Ash Music Corporation (3915); Samson Technologies Corp. (4062); Sam Ash Megastores, LLC (9955); Sam Ash California Megastores, LLC (3598); Sam Ash Florida Megastores, LLC (7276); Sam Ash Illinois Megastores, LLC (8966); Sam Ash Nevada Megastores, LLC (6399); Sam Ash New York Megastores, LLC (7753); Sam Ash New Jersey Megastores, LLC (8788); Sam Ash CT, LLC (5932); Sam Ash Music Marketing, LLC (2024); and Sam Ash Quikship Corp. (7410). The location of debtor Sam Ash Music Corporation's principal place of business is 278 Duffy Avenue, P.O. Box 9047, Hicksville, NY 11802.

² Changes to the agenda are noted in **bold**.

MATTERS GOING FORWARD ON A CONTESTED BASIS

1. Debtors' Motion for Entry of an Order Authorizing (I) Rejection of Unexpired Leases, Effective as of May 31, 2024, and (II) Granting Related Relief [Docket No. 37]

Related Documents:

- A. Declaration of Jordan Meyers in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Docket No. 17]
- B. Notice of Filing of Revised Order Authorizing (I) Rejection of Unexpired Leases, Effective as of May 31, 2024, and (II) Granting Related Relief [Docket No. 37] [Docket No. 172]
- C. Debtors' Omnibus Reply to Objections to Certain of the Debtors' Requested Relief Scheduled for Hearing on June 5, 2024 [Docket No. 174]

Responses/Objections:

- A. Limited Objection of Creditor King of Prussia Center, LLC, to Debtors' Motion for Entry of an Order [Docket No. 129]

Status: This matter is going forward on a contested basis.

2. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Assume and Perform Under the Consulting Agreement Related to the Sale of Inventory, (II) Approving Procedures for the Sale of Inventory, (III) Approving Modifications to Certain Customer Programs, and (IV) Granting Related Relief [Docket No. 14]

Related Documents:

- A. Declaration of Jordan Meyers in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Docket No. 17]
- B. Debtors' Application for Expedited Consideration of First Day Matters [Docket No. 18]
- C. Order Regarding Debtors' Application for Expedited Consideration of First Day Matters [Docket No. 21]
- D. Interim Order (I) Authorizing the Debtors to Assume and Perform Under the Consulting Agreement Related to the Sale of Inventory, (II) Approving Procedures for the Sale of Inventory, (III) Approving Modifications to Certain Customer Programs, and (IV) Granting Related Relief [Docket No. 48]
- E. **Declaration of Joseph Malfitano in Support of Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Assume and**

Perform Under the Consulting Agreement Related to the Sale of Inventory, (II) Approving Procedures for the Sale of Inventory, (III) Approving Modifications to Certain Customer Programs, and (IV) Granting Related Relief [Docket No. 102]

F. Declaration of Disinterestedness of Mark P. Naughton [Docket No. 103]

G. Debtors' Omnibus Reply to Objections to Certain of the Debtors' Requested Relief Scheduled for Hearing on June 5, 2024 [Docket No. 174]

H. Debtors' Witness and Exhibit List for Hearing Scheduled for June 5, 2024 at 10:00 A.M. (ET) [Docket No. 181]

Responses/Objections:

- A. Objection of the United States Trustee to Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Assume and Perform Under the Consulting Agreement Related to the Sale of Inventory, (II) Approving Procedures for the Sale of Inventory, (III) Approving Modifications to Certain Customer Programs, and (IV) Granting Related Relief [Docket No. 124]
- B. Omnibus Objection of the Official Committee of Unsecured Creditors to Motions of Debtors for Entry of Final Orders (I) Authorizing Debtors to Obtain Post-Petition Financing; (II) Establishing Bid Procedures; And (III) Authorizing Debtors to Assume and Perform Under the Consulting Agreement [Docket No. 153]
- C. Declaration of John P. Madden, in Support of the Omnibus Objection of the Official Committee of Unsecured Creditors to Motions of Debtors for Entry of Final Orders (I) Authorizing Debtors to Obtain Post-Petition Financing; (II) Establishing Bid Procedures; And (III) Authorizing Debtors to Assume and Perform Under the Consulting Agreement [Docket No. 153-1]
- D. Official Committee of Unsecured Creditors' Witness and Exhibit List for the Hearing Scheduled on June 5, 2024 at 10:00 A.M. (Prevailing Eastern Time) [Docket No. 179]**

Status: This matter is going forward on a contested basis.

3. Debtors' Motion for Entry of Orders (I) (A) Approving Bidding Procedures and Breakup Fee, (B) Approving Stalking Horse Purchase Agreement, (C) Scheduling an Auction and a Sale Hearing, (D) Approving the Form and Manner of Notice Thereof, and (E) Establishing Notice and Procedures for the Assumption and Assignment of Contracts and Leases and (II) (A) Authorizing the Debtor to Enter into an Asset Purchase Agreement, (B) Approving the Asset Purchase Agreement, and (c) Authorizing the Assumption and Assignment of the Assumed Contracts [Docket No. 47]

Related Documents:

- A. Declaration of Jordan Meyers in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Docket No. 17]
- B. Debtors' Omnibus Reply to Objections to Certain of the Debtors' Requested Relief Scheduled for Hearing on June 5, 2024 [Docket No. 174]
- C. Declaration of Jordan Meyers in Support of Debtors' Motion for Entry of An Order (A) Approving Bidding Procedures and Breakup Fee, (B) Approving Stalking Horse Purchase Agreement, (C) Scheduling an Auction and a Sale Hearing, (D) Approving the Form and Manner of Notice Thereof, and (E) Establishing Notice and Procedures for the Assumption and Assignment of Contracts and Leases [Docket No. 176]
- D. Debtors' Witness and Exhibit List for Hearing Scheduled for June 5, 2024 at 10:00 A.M. (ET) [Docket No. 181]**

Responses/Objections:

- A. Limited Objection of the United States Trustee to Debtors' Motion for Entry of Orders (I) (A) Approving Bidding Procedures and Breakup Fee, (B) Approving Stalking Horse Purchase Agreement, (C) Scheduling an Auction and a Sale Hearing, (D) Approving the Form and Manner of Notice Thereof, and (E) Establishing Notice and Procedures for the Assumption and Assignment of Contracts and Leases and (II) (A) Authorizing the Debtor to Enter into an Asset Purchase Agreement, (B) Approving the Asset Purchase Agreement, and (c) Authorizing the Assumption and Assignment of the Assumed Contracts [Docket No. 125]
- B. Omnibus Objection of the Official Committee of Unsecured Creditors to Motions of Debtors for Entry of Final Orders (I) Authorizing Debtors to Obtain Post-Petition Financing; (II) Establishing Bid Procedures; And (III) Authorizing Debtors to Assume and Perform Under the Consulting Agreement [Docket No. 153]

C. Declaration of John P. Madden, in Support of the Omnibus Objection of the Official Committee of Unsecured Creditors to Motions of Debtors for Entry of Final Orders (I) Authorizing Debtors to Obtain Post-Petition Financing; (II) Establishing Bid Procedures; And (III) Authorizing Debtors to Assume and Perform Under the Consulting Agreement [Docket No. 153-1]

D. Official Committee of Unsecured Creditors' Witness and Exhibit List for the Hearing Scheduled on June 5, 2024 at 10:00 A.M. (Prevailing Eastern Time) [Docket No. 179]

Status: This matter is going forward on a contested basis.

4. Debtors' Motion for Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing Use of Cash Collateral and Affording Adequate Protection; (III) Granting Liens and Providing Superpriority Administrative Expense Status; (IV) Modifying Automatic Stay; and (V) Granting Related Relief [Docket No. 15]

Related Documents:

- A. Declaration of Jordan Meyers in Support of Debtors' Motion for Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing Use of Cash Collateral and Affording Adequate Protection; (III) Granting Liens and Providing Superpriority Administrative Expense Status; (IV) Modifying Automatic Stay; and (V) Granting Related Relief [Docket No. 16]
- B. Declaration of Jordan Meyers in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Docket No. 17]
- C. Debtors' Application for Expedited Consideration of First Day Matters [Docket No. 18]
- D. Order Regarding Debtors' Application for Expedited Consideration of First Day Matters [Docket No. 21]
- E. Interim Order Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, 503, 506, and 507 and Fed. R. Bankr. P. 2002, 4001, 6003, 6004 and 9014 (I) Authorizing Debtors to Obtain Post-Petition Financing, (II) Granting Liens and Superpriority Claims, (III) Authorizing Use of Cash Collateral, (IV) Modifying the Automatic Stay, (V) Scheduling a Final Hearing, and (VI) Granting Related Relief [Docket No. 49]
- F. Debtors' Reply to the Committee's Objection to the DIP Motion [Docket No. 175]

G. Debtors' Witness and Exhibit List for Hearing Scheduled for June 5, 2024 at 10:00 A.M. (ET) [Docket No. 181]

Responses/Objections:

- A. Omnibus Objection of the Official Committee of Unsecured Creditors to Motions of Debtors for Entry of Final Orders (I) Authorizing Debtors to Obtain Post-Petition Financing; (II) Establishing Bid Procedures; And (III) Authorizing Debtors to Assume and Perform Under the Consulting Agreement [Docket No. 153]
- B. Declaration of John P. Madden, in Support of the Omnibus Objection of the Official Committee of Unsecured Creditors to Motions of Debtors for Entry of Final Orders (I) Authorizing Debtors to Obtain Post-Petition Financing; (II) Establishing Bid Procedures; And (III) Authorizing Debtors to Assume and Perform Under the Consulting Agreement [Docket No. 153-1]
- C. **Official Committee of Unsecured Creditors' Witness and Exhibit List for the Hearing Scheduled on June 5, 2024 at 10:00 A.M. (Prevailing Eastern Time) [Docket No. 179]**

Status: This matter is going forward on a contested basis.

MATTERS GOING FORWARD ON AN UNCONTESTED BASIS OR OTHERWISE RESOLVED

- 1. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) File a Consolidated List of the Debtors' 30 Largest Unsecured Creditors, (B) File a Consolidated List of Creditors in Lieu of Submitting a Separate Mailing Matrix for Each Debtor, and (C) Redact Certain Personally Identifiable Information, and (II) Granting Related Relief [Docket No. 6]

Related Documents:

- A. Declaration of Jordan Meyers in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Docket No. 17]
- B. Debtors' Application for Expedited Consideration of First Day Matters [Docket No. 18]
- C. Order Regarding Debtors' Application for Expedited Consideration of First Day Matters [Docket No. 21]
- D. Interim Order (I) Authorizing the Debtors to (A) File a Consolidated List of the Debtors' 30 Largest Unsecured Creditors, (B) File a Consolidated List of Creditors in Lieu of Submitting a Separate Mailing Matrix for Each Debtor, and

(C) Redact Certain Personally Identifiable Information, and (II) Granting Related Relief [Docket No. 41]

- E. Notice of Filing of Revised Order (I) Authorizing the Debtors to (A) File a Consolidated List of the Debtors' 30 Largest Unsecured Creditors, (B) File a Consolidated List of Creditors in Lieu of Submitting a Separate Mailing Matrix for Each Debtor, and (C) Redact Certain Personally Identifiable Information, and (II) Granting Related Relief [Docket No. 166]

Status: With the permission of the Court, this matter will be decided on the papers and no appearances are required. The Debtors respectfully request that the Court enter the Order in the form attached to the notice of filing of revised order.

2. Debtors' Motion for Entry of Interim and Final Orders (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services, (III) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, and (IV) Granting Related Relief [Docket No. 8]

Related Documents:

- A. Declaration of Jordan Meyers in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Docket No. 17]
- B. Debtors' Application for Expedited Consideration of First Day Matters [Docket No. 18]
- C. Order Regarding Debtors' Application for Expedited Consideration of First Day Matters [Docket No. 21]
- D. Interim Order (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services, (III) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, and (IV) Granting Related Relief [Docket No. 43]

Responses/Objections:

- A. Objection of Duke Energy to Debtors' Debtors' Motion for Entry of Interim and Final Orders (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services, (III) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, and (IV) Granting Related Relief [Docket No. 128]

Status: The parties have agreed to resolve this matter and will submit a stipulation to the Court.

3. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Payment of Certain Prepetition Taxes and Fees and (II) Granting Related Relief [Docket No. 9]

Related Documents:

- A. Declaration of Jordan Meyers in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Docket No. 17]
- B. Debtors' Application for Expedited Consideration of First Day Matters [Docket No. 18]
- C. Order Regarding Debtors' Application for Expedited Consideration of First Day Matters [Docket No. 21]
- D. Interim Order I) Authorizing Payment of Certain Prepetition Taxes and Fees and (II) Granting Related Relief [Docket No. 44]
- E. Notice of Filing of Revised Final Order (I) Authorizing Payment of Certain Prepetition Taxes and Fees and (II) Granting Related Relief [Docket No. 173]

Status: With the permission of the Court, this matter will be decided on the papers and no appearances are required. The Debtors respectfully request that the Court enter the Order in the form attached to the notice of filing of revised order.

4. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses and (B) Continue Employee Benefits Programs and (II) Granting Related Relief [Docket No. 10]

Related Documents:

- A. Declaration of Jordan Meyers in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Docket No. 17]
- B. Debtors' Application for Expedited Consideration of First Day Matters [Docket No. 18]
- C. Order Regarding Debtors' Application for Expedited Consideration of First Day Matters [Docket No. 21]
- D. Interim Order (I) Authorizing the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses

and (B) Continue Employee Benefits Programs and (II) Granting Related Relief [Docket No. 46]

- E. Notice of Filing of Revised Final Order (I) Authorizing the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses and (B) Continue Employee Benefits Programs and (II) Granting Related Relief [Docket No. 167]

Status: With the permission of the Court, this matter will be decided on the papers and no appearances are required. The Debtors respectfully request that the Court enter the Order in the form attached to the notice of filing of revised order.

5. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Maintain and Administer Their Existing Customer Programs and Honor Certain Prepetition Obligations Related Thereto, and (II) Granting Related Relief [Docket No. 11]

Related Documents:

- A. Declaration of Jordan Meyers in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Docket No. 17]
- B. Debtors' Application for Expedited Consideration of First Day Matters [Docket No. 18]
- C. Order Regarding Debtors' Application for Expedited Consideration of First Day Matters [Docket No. 21]
- D. Interim Order (I) Authorizing the Debtors to Maintain and Administer Their Existing Customer Programs and Honor Certain Prepetition Obligations Related Thereto, and (II) Granting Related Relief [Docket No. 50]
- E. Certification of No Objection Regarding Debtors Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Maintain and Administer Their Existing Customer Programs and Honor Certain Prepetition Obligations Related Thereto, and (II) Granting Related Relief [Docket No. 163]

Status: With the permission of the Court, this matter will be decided on the papers and no appearances are required. The Debtors respectfully request that the Court enter the Order in the form attached to the certification of no objection.

6. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue to Perform Intercompany Transactions, (II) Granting Administrative Expense Status to Postpetition Intercompany Claims, and (III) Granting Related Relief [Docket No. 12]

Related Documents:

- A. Declaration of Jordan Meyers in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Docket No. 17]
- B. Debtors' Application for Expedited Consideration of First Day Matters [Docket No. 18]
- C. Order Regarding Debtors' Application for Expedited Consideration of First Day Matters [Docket No. 21]
- D. Interim Order (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue to Perform Intercompany Transactions, (II) Granting Administrative Expense Status to Postpetition Intercompany Claims, and (III) Granting Related Relief [Docket No. 51]
- E. Notice of Filing of Revised Final Order (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue to Perform Intercompany Transactions, (II) Granting Administrative Expense Status to Postpetition Intercompany Claims, and (III) Granting Related Relief [Docket No. 171]

Status: With the permission of the Court, this matter will be decided on the papers and no appearances are required. The Debtors respectfully request that the Court enter the Order in the form attached to the notice of filing of revised order.

7. Debtors' Motion for Entry of Interim and Final Orders Authorizing the Debtors to (I) Maintain Insurance and Surety Coverage Entered into Prepetition and Pay Related Prepetition Obligations, (II) Continue to Pay Certain Brokerage Fees, and (III) Renew, Supplement, Modify, or Purchase Insurance and Surety Coverage in the Ordinary Course of Business [Docket No. 13]

Related Documents:

- A. Declaration of Jordan Meyers in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Docket No. 17]
- B. Debtors' Application for Expedited Consideration of First Day Matters [Docket No. 18]
- C. Order Regarding Debtors' Application for Expedited Consideration of First Day Matters [Docket No. 21]
- D. Interim Order Authorizing the Debtors to (I) Maintain Insurance and Surety Coverage Entered into Prepetition and Pay Related Prepetition Obligations, (II) Continue to Pay Certain Brokerage Fees, and (III) Renew, Supplement, Modify, or Purchase Insurance and Surety Coverage in the Ordinary Course of Business [Docket No. 45]
- E. Certification of No Objection Regarding Debtors' Motion for Entry of Interim and Final Orders Authorizing the Debtors to (I) Maintain Insurance and Surety Coverage Entered into Prepetition and Pay Related Prepetition Obligations, (II) Continue to Pay Certain Brokerage Fees, and (III) Renew, Supplement, Modify, or Purchase Insurance and Surety Coverage in the Ordinary Course of Business [Docket No. 164]

Status: With the permission of the Court, this matter will be decided on the papers and no appearances are required. The Debtors respectfully request that the Court enter the Order in the form attached to the certification of no objection.

8. Debtors' Motion for Entry of an Administrative Fee Order Establishing Procedures for the Allowance and Payment of Interim Compensation and Reimbursement of Expenses of Professionals Retained by Order of this Court [Docket No. 70]

Related Documents:

- A. Declaration of Jordan Meyers in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Docket No. 17]
- B. Notice of Filing of Proposed Administrative Fee Order Establishing Procedures for the Allowance and Payment of Interim Compensation and Reimbursement of Expenses of Professionals Retained by Order of this Court [Docket No. 165]

Status: With the permission of the Court, this matter will be decided on the papers and no appearances are required. The Debtors respectfully request that the Court enter the Order in the form attached to the notice of filing of proposed order.

9. Debtors' Motion for Entry of an Order Authorizing the Debtors to Employ and Compensate Professionals Utilized in the Ordinary Course of Business [Docket No. 69]

Related Documents:

- A. Declaration of Jordan Meyers in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Docket No. 17]
- B. Notice of Filing of Proposed Order Authorizing the Debtors to Employ and Compensate Professionals Utilized in the Ordinary Course of Business [Docket No. 169]

Status: With the permission of the Court, this matter will be decided on the papers and no appearances are required. The Debtors respectfully request that the Court enter the Order in the form attached to the notice of filing of proposed order.

10. Debtors' Motion for Entry of an Order (I) Authorizing and Approving Procedures to Reject Executory Contracts and Unexpired Leases, and (II) Granting Related Relief [Docket No. 71]

Related Documents:

- A. Declaration of Jordan Meyers in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Docket No. 17]
- B. Notice of Filing of Revised Proposed Order (I) Authorizing and Approving Procedures to Reject Executory Contracts and Unexpired Leases, and (II) Granting Related Relief [Docket No. 168]

Status: With the permission of the Court, this matter will be decided on the papers and no appearances are required. The Debtors respectfully request that the Court enter the Order in the form attached to the notice of filing of revised order.

11. Debtors' Motion for Entry of an Order (I) Setting Bar Dates for Submitting Proofs of Claim, Including Requests for Payment Under Section 503(b)(9), (II) Establishing Amended Schedules Bar Date, Rejection Damages Bar Date, and Administrative Claims Bar Date, (III) Approving the Form, Manner, and Procedures for Filing Proofs of Claim, (IV) Approving Notice Thereof, and (V) Granting Related Relief [Docket No. 79]

Related Documents:

- A. Declaration of Jordan Meyers in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Docket No. 17]
- B. Notice of Filing of Revised Order (I) Setting Bar Dates for Submitting Proofs of Claim, Including Requests for Payment Under Section 503(b)(9), (II) Establishing Amended Schedules Bar Date, Rejection Damages Bar Date, and Administrative Claims Bar Date, (III) Approving the Form, Manner, and Procedures for Filing Proofs of Claim, (IV) Approving Notice Thereof, and (V) Granting Related Relief [Docket No. 170]

Status: With the permission of the Court, this matter will be decided on the papers and no appearances are required. The Debtors respectfully request that the Court enter the Order in the form attached to the notice of filing of revised order.

DATED: June 4, 2024

Respectfully submitted,

COLE SCHOTZ P.C.

By: /s/ Ryan T. Jareck

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