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Counsel to the Reorganized Debtor

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

)				
In re:)				Chapter 11
)				
PIER 1 IMPORTS, INC., <i>et al.</i> , ¹)				Case No. 20-30805 (KRH)
)				
Reorganized Debtors.)				(Jointly Administered)
)				

**CERTIFICATION OF NO OBJECTION AND
NOTICE OF FILING OF REVISED PROPOSED ORDER**

PLEASE TAKE NOTICE that the above-captioned reorganized debtor (the “Reorganized Debtor”) filed the *Motion for Entry of an Order (I) Granting a Final Decree and Closing the Chapter 11 Case of Pier 1 Imports, Inc.; (II) Terminating Kroll as Claims and Noticing Agent; (III) Approving Certain Retention Compensation; and (IV) Granting Related Relief* [Docket No. 1855] (the “Motion”) with the United States Bankruptcy Court for the Eastern District of Virginia (the “Court”) on January 2, 2025.

PLEASE TAKE FURTHER NOTICE the undersigned certifies that the Reorganized Debtor served the Motion on all necessary parties on January 2, 2025, in accordance with the *Order (I) Establishing Certain Notice, Case Management, and Administrative Procedures and (II) Granting Related Relief* entered on February 24, 2020 [Docket No. 151] (collectively, the “Procedures”). Pursuant to the Procedures, all objections to the approval of the relief requested in the Motion were due on or before January 13, 2025.

¹ The debtors in these chapter 11 cases, Pier 1 Imports, Inc. and its debtor affiliates (the “Debtors”) along with the last four digits of each Debtor’s federal tax identification number, are set forth in the *Order (I) Directing Joint Administration of Chapter 11 Cases and (II) Granting Related Relief* [Docket No. 76]. The location of the Debtors’ service address is P.O. Box 60818, Fort Worth, TX 76115.

PLEASE TAKE FURTHER NOTICE that in connection with the Motion, the Reorganized Debtor has made certain revisions to the proposed form of order that was attached to the Motion and is hereby filing a revised proposed *Final Decree in the Chapter 11 Case of Pier 1 Imports, Inc.* (the "Revised Proposed Order"), which is attached hereto as **Exhibit A**.

PLEASE TAKE FURTHER NOTICE that attached hereto as **Exhibit B** is a redline of the Revised Proposed Order as compared to the proposed order originally filed in connection with the Motion.

PLEASE TAKE FURTHER NOTICE that the undersigned further certifies that the notice filed with the Motion includes a statement that the Motion may be granted and an order entered without a hearing unless a timely objection is made. The undersigned further certifies that he has caused a review of the Court's docket in this case and no answer, objection, or other responsive pleading to the Motion appears thereon. Consequently, the Reorganized Debtor is authorized to submit a final order granting the relief requested in the Motion to the Court for entry without further hearing or notice.

PLEASE TAKE FURTHER NOTICE THAT copies of the Motion, the Revised Proposed Order, and all other documents filed in this case, are available: (a) upon request to Epiq Corporate Restructuring, LLC (the notice and claims agent retained in these chapter 11 cases) by calling (866) 977-0883; (b) by visiting the website maintained in these chapter 11 cases at <https://dm.epiq11.com/case/pier1>; or (c) for a fee via PACER by visiting <http://www.vaeb.uscourts.gov>.

Dated: January 14, 2025
Richmond, Virginia

/s/ Jeremy S. Williams

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Counsel to Reorganized Debtor

Exhibit A

Revised Proposed Order

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 FOR THE EASTERN DISTRICT OF VIRGINIA
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In re:)	
)	Chapter 11
PIER 1 IMPORTS, INC., <i>et al.</i> , ¹)	Case No. 20-30805 (KRH)
)	
Reorganized Debtors.)	(Jointly Administered)
)	

FINAL DECREE IN THE CHAPTER 11 CASE OF PIER 1 IMPORTS, INC.

Upon the motion (the “Motion”)² of the Pier 1 Imports, Inc. (collectively, the “Reorganized Debtor”), by counsel, for entry of a final decree, pursuant to sections 105 and 350 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (as amended, the “Bankruptcy Code”) and Rule 3022 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), closing the bankruptcy case of Pier 1 Imports, Inc. [Case No. 20-30805] (“Pier 1”), the Court finds that: (i) the estate of Pier 1 has been fully administered; (ii) it has jurisdiction over the matters raised in the Motion pursuant to 28 U.S.C. § 1334(b); (iii) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); (iv) the relief requested in the Motion is in the best interest of

¹ The debtors in these chapter 11 cases, Pier 1 Imports, Inc. and its debtor affiliates (the “Debtors”) along with the last four digits of each Debtor’s federal tax identification number, are set forth in the *Order (I) Directing Joint Administration of Chapter 11 Cases and (II) Granting Related Relief* [Docket No. 76]. The location of the Debtors’ service address is P.O. Box 60818, Fort Worth, TX 76115.

² Capitalized terms not otherwise defined herein shall have the meanings set forth in the Motion.

the Debtors, their estates and their creditors; (v) the Reorganized Debtor has made adequate provision for the payment of all required classes under the Plan and upon making any final distribution, will have fully satisfied all classes under the Plan; (vi) proper and adequate notice of the Motion and the hearing thereon has been given and no other or further notice is necessary; and (vii) upon the record herein, after due deliberation thereon, good and sufficient cause exists for the granting of the relief set forth herein, it is hereby ORDERED, ADJUDGED and DECREED that:

1. The Motion is granted.
2. Pursuant to sections 105(a) and 350(a), the chapter 11 case of Pier 1 shall be and hereby is closed effective as of the date of the entry of this final decree.
3. The Clerk of the Court shall enter this final decree and thereafter the docket for Pier 1 shall be marked as "Closed."
4. This final decree is without prejudice to any party's rights to re-open the case of Pier 1.
5. The employment of Epiq Corporate Restructuring, LLC as claims and noticing agent (in such capacity, the "Agent") in these chapter 11 cases is terminated as of the date of this Final Decree. The Agent is thereby released and discharged as the claims and noticing agent and shall bear not further responsibility in these chapter 11 cases, except that the Agent (a) provide to the Court the final version of the claims registers as of the date immediately before the close of the chapter 11 cases, (b) forward to the Clerk of the Court an electronic version of all imaged claims, (c) upload the creditor mailing list into CM/ECF; and (d) docket a final claims register. The Agent may reduce the public case administration website to a static homepage, and in its discretion, may opt to deactivate the website altogether. The Agent shall keep electronic copies of all records until

one (1) year (after which time the Agent may, but is not required to, destroy such records), and the Agent need not keep paper copies of such records. The Agent may destroy (a) all excess copies of notices, pleadings, plan solicitation documents, customized envelopes, and other printed materials, and (b) all undeliverable and/or returned mail not previously destroyed. The Agent shall be compensated by the Debtors' estates for the performance of services required hereunder in accordance with the terms of its retention order.

6. Notwithstanding the foregoing, nothing contained herein shall alter the right of the Reorganized Debtor to employ the Agent for the purpose of making any additional distributions required to be made under the Plan.

7. Any claimant which was previously sent a distribution, but which entity did not cash such distribution for a period in excess of six months, shall be deemed to have waived all rights to receive any further distributions under the Plan.

8. The claimants set forth on Exhibit B to the Motion are deemed to have waived their right to any distribution under the Plan to the extent they fail to provide the Reorganized Debtor with the required tax forms prior to the date this Order becomes final and non-appealable.

9. Upon issuance of the final distribution, and excluding with respect to those parties set forth in paragraph 7 above, any checks which are not cashed or otherwise claimed within 90 days of such distribution, shall be deemed unclaimed property under 11 U.S.C. § 347 and the Plan, and the Reorganized Debtor, after accounting for any additional costs necessary to wind down the Reorganized Debtor, shall donate such proceeds to any charity which is qualified as tax-exempt under section 501(c)(3) of the Internal Revenue Code.

10. No sales taxes or other related obligations are due and owing to any taxing authority and any such claims against the Debtors, the Reorganized Debtors, any officers, directors or responsible persons of the Debtors or Reorganized Debtors shall be deemed satisfied in full.

11. No franchise taxes are due and owing to the Delaware Division of Corporations and Delaware and any related political subdivisions shall accept any subsequently filed dissolution and/or termination requests for the Debtors, without further condition.

12. The Plan Administrator is authorized to distribute \$175,000 to himself, \$125,000 for each of his two remaining consultants and \$20,000 each for each of the two accountants, as additional retention compensation, in addition to such other amounts as may be due and owing to such individuals under the applicable employment agreements.

13. For the purposes of calculating quarterly fees payable to the Office of the United States Trustee for the Eastern District of Virginia in accordance with 28 U.S.C. § 1930(a)(6), all disbursements made by the Reorganized Debtor, on behalf of the Debtors, up to the date of entry of this Final Decree will be included in the calculation, and Reorganized Debtor shall pay these amounts, if any, promptly. The Reorganized Debtors shall provide the United States Trustee documentation regarding such disbursements as the United States Trustee may reasonably request. No disbursements made by the Reorganized Debtor after the date of entry of this Final Decree will be included in subsequent calculations, and no minimum quarterly fees will be payable in respect to the Debtors for periods after entry of this Final Decree.

14. The Reorganized Debtor is authorized to take all actions necessary to effectuate the relief granted pursuant to this Final Decree in accordance with the Motion.

15. The terms and conditions of this final decree shall be immediately effective and enforceable upon its entry.

16. The requirement under Local Bankruptcy Rule 9013-1(G) to file a memorandum of law in connection with the Motion is hereby waived.

17. Notice of the Motion satisfies the requirements of the Bankruptcy Rules and the Local Bankruptcy Rules and is sufficient in all respects.

18. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this final decree.

Date: _____
Richmond, Virginia

UNITED STATES BANKRUPTCY JUDGE

WE ASK FOR THIS:

/s/ Jeremy S. Williams
Michael A. Condyles (VA 27807)
Peter J. Barrett (VA 46179)
Jeremy S. Williams (VA 77469)
Adolyn C. Wyatt (VA 97746)
KUTAK ROCK LLP
1021 East Cary Street, Suite 810
Richmond, Virginia 23219
Telephone: (804) 644-1700
Facsimile: (804) 783-6192

Counsel to the Reorganized Debtors

SEEN:

/s/ Kathryn Montgomery
Kathryn R. Montgomery
Office of the U.S. Trustee
701 East Broad Street
Suite 4304
Richmond, Virginia 23219
Assistant United States Trustee

**CERTIFICATION OF ENDORSEMENT
UNDER LOCAL BANKRUPTCY RULE 9022-1(C)**

Pursuant to Local Bankruptcy Rule 9022-1(C), I hereby certify that the foregoing proposed order has been endorsed by or served upon all necessary parties.

/s/ Jeremy S. Williams _____

Exhibit B

Redline

the Debtors, their estates and their creditors; (v) the Reorganized Debtor has made adequate provision for the payment of all required classes under the Plan and upon making any final distribution, will have fully satisfied all classes under the Plan; (vi) proper and adequate notice of the Motion and the hearing thereon has been given and no other or further notice is necessary; and (vii) upon the record herein, after due deliberation thereon, good and sufficient cause exists for the granting of the relief set forth herein, it is hereby ORDERED, ADJUDGED and DECREED that:

1. The Motion is granted.
2. Pursuant to sections 105(a) and 350(a), the chapter 11 case of Pier 1 shall be and hereby is closed effective as of the date of the entry of this final decree.
3. The Clerk of the Court shall enter this final decree and thereafter the docket for Pier 1 shall be marked as “Closed.”
4. This final decree is without prejudice to any party’s rights to re-open the case of Pier 1.
5. The employment of Epiq Corporate Restructuring, LLC as claims and noticing agent (in such capacity, the “Agent”) in these chapter 11 cases is terminated as of the date of this Final Decree. The Agent is thereby released and discharged as the claims and noticing agent and shall bear not further responsibility in these chapter 11 cases, except that the Agent (a) provide to the Court the final version of the claims registers as of the date immediately before the close of the chapter 11 cases, (b) forward to the Clerk of the Court an electronic version of all imaged claims, (c) upload the creditor mailing list into CM/ECF; and (d) docket a final claims register. The Agent may reduce the public case administration website to a static homepage, and in its discretion, may opt to deactivate the website altogether. The Agent shall keep electronic copies

of all records until one (1) year (after which time the Agent may, but is not required to, destroy such records), and the Agent need not keep paper copies of such records. The Agent may destroy (a) all excess copies of notices, pleadings, plan solicitation documents, customized envelopes, and other printed materials, and (b) all undeliverable and/or returned mail not previously destroyed. The Agent shall be compensated by the Debtors' estates for the performance of services required hereunder in accordance with the terms of its retention order.

6. Notwithstanding the foregoing, nothing contained herein shall alter the right of the Reorganized Debtor to employ the Agent for the purpose of making any additional distributions required to be made under the Plan.

7. Any claimant which was previously sent a distribution, but which entity did not cash such distribution for a period in excess of six months, shall be deemed to have waived all rights to receive any further distributions under the Plan.

8. The claimants set forth on Exhibit B to the Motion are deemed to have waived their right to any distribution under the Plan to the extent they fail to provide the Reorganized Debtor with the required tax forms prior to the date this Order becomes final and non-appealable.

9. Upon issuance of the final distribution, and excluding with respect to those parties set forth in paragraph 7 above, any checks which are not cashed or otherwise claimed within 90 days of such distribution, shall be deemed unclaimed property under 11 U.S.C. § 347 and the Plan, and the Reorganized Debtor, after accounting for any additional costs necessary to wind down the Reorganized Debtor, shall donate such proceeds to any charity which is qualified as tax-exempt under section 501(c)(3) of the Internal Revenue Code.

10. No sales taxes or other related obligations are due and owing to any taxing authority and any such claims against the Debtors, the Reorganized Debtors, any officers,

directors or responsible persons of the Debtors or Reorganized Debtors shall be deemed satisfied in full.

11. No franchise taxes are due and owing to the Delaware Division of Corporations and Delaware and any related political subdivisions shall accept any subsequently filed dissolution and/or termination requests for the Debtors, without further condition.

12. The Plan Administrator is authorized to distribute \$175,000 to himself, \$125,000 for each of his two remaining consultants and \$20,000 each for each of the two accountants, as additional retention compensation, in addition to such other amounts as may be due and owing to such individuals under the applicable employment agreements.

13. For the purposes of calculating quarterly fees payable to the Office of the United States Trustee for the Eastern District of Virginia in accordance with 28 U.S.C. § 1930(a)(6), all disbursements made by the Reorganized Debtor, on behalf of the Debtors, up to the date of entry of this Final Decree will be included in the calculation, and Reorganized Debtor shall pay these amounts, if any, promptly. The Reorganized Debtors shall provide the United States Trustee documentation regarding such disbursements as the United States Trustee may reasonably request. No disbursements made by the Reorganized Debtor after the date of entry of this Final Decree will be included in subsequent calculations, and no minimum quarterly fees will be payable in respect to the Debtors for periods after entry of this Final Decree. ~~Furthermore, any credits or refunds which may be due and owing to the Reorganized Debtor, as of the date of the entry of the Final Decree, shall promptly be remitted to the Reorganized Debtor.~~

14. The Reorganized Debtor is authorized to take all actions necessary to effectuate the relief granted pursuant to this Final Decree in accordance with the Motion.

15. The terms and conditions of this final decree shall be immediately effective and enforceable upon its entry.

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Date: _____
Richmond, Virginia

UNITED STATES BANKRUPTCY JUDGE

[WE ASK FOR THIS:](#)

/s/ Jeremy S. Williams
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Counsel to the Reorganized Debtors

[SEEN:](#)

/s/ Kathryn Montgomery_____

[Kathryn R. Montgomery](#)
[Office of the U.S. Trustee](#)
[701 East Broad Street](#)
[Suite 4304](#)
[Richmond, Virginia 23219](#)
[Assistant United States Trustee](#)

CERTIFICATION OF ENDORSEMENT
UNDER LOCAL BANKRUPTCY RULE 9022-1(C)

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/s/ Jeremy S. Williams _____