

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

In re:

SYNTHEGO CORPORATION,<sup>1</sup>

Debtor.

Chapter 11

Case No. 25-10823 (MFW)

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING ON MAY 8, 2025  
AT 12:30 P.M. EASTERN TIME BEFORE THE HONORABLE MARY F. WALRATH  
AT THE UNITED STATES BANKRUPTCY COURT, 824 NORTH MARKET STREET,  
5TH FLOOR, COURTROOM NO. 4, WILMINGTON, DELAWARE 19801**

**This proceeding will be conducted remotely via Zoom only. Please refer to Judge Walrath's Chambers Procedures (<https://www.deb.uscourts.gov/judge-mary-f-walrath>) and the Court's website (<http://www.deb.uscourts.gov/ecourt-appearances>) for information on the method of allowed participation (video or audio), Judge Walrath's expectations of remote participants, and the advance registration requirements.**

**The deadline to register for remote attendance at first day or emergency hearings is one hour prior to the hearing (Prevailing Eastern Time) unless otherwise noticed using the *eCourtAppearances* tool available on the Court's website.**

1. Voluntary Petition of Synthego Corporation, Case No. 25-10823 (MFW) [Filed: 05/05/25] ([Docket No. 1](#)).

**First Day Declarations**

2. Declaration of Craig Christianson in Support of the Debtor's Chapter 11 Petition and First Day Relief [Filed: 05/05/25] ([Docket No. 3](#)).
3. Declaration of Allen Soong in Support of the Debtor's Chapter 11 Petition and First Day Relief [Filed: 05/05/25] ([Docket No. 4](#)).

Status: The Debtor will ask the Court to admit the declarations into evidence. To the extent the Court or any party in interest have questions regarding the declaration or the factual bases for the first-day relief the Debtor seeks, the declarants will be available via Zoom videoconference.

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<sup>1</sup> The Debtor's mailing address is 3696 Haven Avenue, Suite A, Redwood City, California, 94063, and the last four digits of the Debtor's federal tax identification number is 9518.

**Administrative Motion**

4. Debtor's Application for Entry of an Order (I) Approving the Retention and Appointment of Epiq Corporate Restructuring, LLC as the Claims and Noticing Agent to the Debtor, Effective as of the Petition Date, and (II) Granting Related Relief [Filed: 05/06/25] ([Docket No. 5](#)).

Status: This matter is going forward.

**First Day Motions Pertaining to Operations**

5. Motion for Entry of Interim and Final Orders Authorizing the Debtor to (A) Continue Operating Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Continue Company Credit Card Program and Disbursements Process, (D) Maintain Existing Business Forms, and (E) Granting Related Relief [Filed: 05/06/25] ([Docket No. 6](#)).

Status: This matter is going forward. The Debtor will seek interim relief.

6. Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Honor Certain Prepetition Obligations to Customers and (B) Otherwise Continue the Debtor's Customer Credits Program in the Ordinary Course of Business and (II) Granting Related Relief [Filed: 05/06/25] ([Docket No. 7](#)).

Status: This matter is going forward. The Debtor will seek interim relief.

7. Motion for Entry of Interim and Final Orders: (I) Authorizing the Payment of Certain Taxes; and (II) Granting Related Relief [Filed: 05/06/25] ([Docket No. 8](#)).

Status: This matter is going forward. The Debtor will seek interim relief.

8. Motion for Entry of Interim and Final Orders (I) Authorizing, but not Directing, the Debtor to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses and (B) Continue Employee Benefits Programs and (II) Granting Related Relief [Filed: 05/06/25] ([Docket No. 9](#)).

Status: This matter is going forward. The Debtor will seek interim relief.

9. Motion for Entry of Interim and Final Orders (I) Approving Proposed Form of Adequate Assurance of Payment to Utility Companies; (II) Establishing Procedures for Resolving Objections by Utility Companies; (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service; and (IV) Granting Related Relief [Filed: 05/06/25] ([Docket No. 10](#)).

Status: This matter is going forward. The Debtor will seek interim relief.

**Motion Pertaining to Financing**

10. Motion of the Debtor for Entry of Interim and Final Orders (I) Authorizing the Debtor to Obtain Post-Petition Secured Financing, (II) Authorizing the Use of Cash Collateral, (III) Granting Liens and Superpriority Administrative Expense Status, (IV) Granting Adequate Protection, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed: 05/06/25] ([Docket No. 11](#)).

Status: This matter is going forward. The Debtor will seek interim relief.

**Motion Pertaining to Sale filed for Scheduling**

11. Motion for (I) an Order (A) Authorizing Entry Into Asset Purchase Agreement with Respect to the Sale of Substantially all of the Debtor's Assets, (B) Approving Bid Procedures for the Sale of Substantially all of the Debtor's Assets, (C) Scheduling an Auction and Sale Hearing, (D) Approving the Form and Manner of Notice Thereof, (E) Approving Certain Termination Fee and Expense Reimbursement Provisions, and (F) Granting Related Relief; and (II) an Order (A) Approving the Sale of the Debtor's Assets Free and Clear of All Encumbrances, (B) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases, and (C) Granting Related Relief [Filed: 05/06/25] ([Docket No. 12](#)).

Status: The Debtor will request scheduling of a hearing on bid procedures.

Dated: May 6, 2025

PACHULSKI STANG ZIEHL & JONES LLP

*/s/ James E. O'Neill*

Debra I. Grassgreen, (*pro hac vice* pending)

Maxim B. Litvak, (*pro hac vice* pending)

Malhar S. Pagay, (*pro hac vice* pending)

James E. O'Neill (DE Bar No. 4042)

919 North Market Street, 17th Floor

P.O. Box 8750

Wilmington, Delaware 19899-8705

Tel: 302-652-4100

Fax: 302-652-4400

Email: [dgrassgreen@pszjlaw.com](mailto:dgrassgreen@pszjlaw.com)

[mlitvak@pszjlaw.com](mailto:mlitvak@pszjlaw.com)

[mpagay@pszjlaw.com](mailto:mpagay@pszjlaw.com)

[joneill@pszjlaw.com](mailto:joneill@pszjlaw.com)

*Proposed Counsel to the  
Debtor and Debtor in Possession*