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

In re:

THE MITCHELL GOLD CO., LLC, et al.,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-11385 (LSS)

Jointly Administered

<u>Hearing Date:</u> October 2, 2023, at 2:00 p.m. (ET)

<u>Objection Deadline:</u> September 25, 2023, at 4:00 p.m. (ET)

Re: D.I. 27

## NOTICE OF DEBTORS' MOTION FOR ENTRY OF INTERIM AND FINAL ORDERS (I) AUTHORIZING THE DEBTORS TO HONOR CERTAIN CUSTOMER PRACTICES AND AUTHORIZE DEVELOPING THE MERCHANDISE RETRIEVAL PROCESS, (II) AFTER TITLE IS DETERMINED, GRANTING LIMITED RELIEF FROM THE <u>AUTOMATIC STAY, AND (III) GRANTING RELATED RELIEF</u>

**PLEASE TAKE NOTICE** that on September 12, 2023, the above-captioned debtors and debtors in possession (the "Debtors") filed the Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Honor Certain Customer Practices and Authorize Developing the Merchandise Retrieval Process, (II) After Title is Determined, Granting Limited Relief from the Automatic Stay, and (III) Granting Related Relief [D.I. 27] (the "Motion").

**PLEASE TAKE FURTHER NOTICE** that any responses or objections to the Motion must (a) be in writing; (b) be filed with the Clerk of the Bankruptcy Court, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before **September 25, 2023, at 4:00 p.m.** (ET) (the "Objection Deadline"); and (c) served so as to be received on or before the Objection Deadline by the undersigned counsel to the Debtors.

**PLEASE TAKE FURTHER NOTICE** THAT A HEARING ON THE MOTION WILL BE HELD ON <u>OCTOBER 2, 2023, AT 2:00 P.M. (ET)</u> BEFORE THE HONORABLE LAURIE SELBER SILVERSTEIN AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 6th FLOOR, WILMINGTON, DELAWARE 19801.

<sup>&</sup>lt;sup>1</sup> The Debtors in these chapter 11 cases, along with the Debtors' federal tax identification numbers are: The Mitchell Gold Co., LLC (8942) and SG-TMGC, LLC (0248). The Debtors' addresses are, respectively, 135 One Comfortable Place, Taylorsville, North Carolina 28681 and P.O. Box 3417, Little Rock, Arkansas 72203.

**PLEASE TAKE FURTHER NOTICE** THAT ONLY OBJECTIONS MADE IN WRITING AND TIMELY FILED AND RECEIVED IN ACCORDANCE WITH THE PROCEDURES ABOVE WILL BE CONSIDERED BY THE COURT AT SUCH HEARING.

# IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: September 15, 2023 Wilmington, Delaware

#### **MORRIS, NICHOLS, ARSHT & TUNNELL LLP**

<u>/s/ Evanthea Hammer</u> Robert J. Dehney (No. 3578) Andrew R. Remming (No. 5120) Daniel B. Butz (No. 4227) Evanthea Hammer (No. 7061) 1201 Market Street, 16th Floor Wilmington, Delaware 19801 Telephone: (302) 658-9200 Facsimile: (302) 658-3989 Email: rdehney@morrisnichols.com aremming@morrisnichols.com dbutz@morrisnichols.com ehammer@morrisnichols.com

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#### **RAYBURN COOPER & DURHAM, P.A.**

C. Richard Rayburn Jr. (admitted *pro hac vice*) Matthew L. Tomsic (admitted *pro hac vice*) Suite 1200, The Carillon 227 West Trade Street Charlotte, NC 28202 (704) 334-0891

Proposed Counsel to the Debtors and Debtors in Possession