

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

In re:

OLD LC, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 19-11791 (BLS)  
(Jointly Administered)

**Obj. Deadline: August 12, 2020 at 4:00 p.m. (ET)**  
**Hearing Date: August 19, 2020 at 11:00 a.m. (ET)**

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE THAT** on July 22, 2020, the Official Committee of Unsecured Creditors (the “Committee”) of Old LC, Inc. and its affiliated debtors and debtors-in-possession (the “Debtors”), by and through its undersigned counsel, filed the *Emergency Motion of the Official Committee of Unsecured Creditors for an Order, Pursuant to Section 1112(b) of the Bankruptcy Code, Converting the Debtors’ Cases to Cases Under Chapter 7* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

**PLEASE TAKE FURTHER NOTICE** that responses, if any, to the Motion must be in writing, in conformity with the Federal Rules of Bankruptcy Procedure and the Local Rules of the United States Bankruptcy Court for the District of Delaware, filed with the Bankruptcy Court and served upon, so as to be received by, the undersigned counsel on or before **August 12, 2020 at 4:00 p.m. (ET)** (the “Objection Deadline”). At the same time, you must also serve a copy of the response upon Committee’s counsel:

Jeffrey R. Waxman (DE Bar No. 4159)  
Eric J. Monzo (DE Bar No. 5214)  
Brya M. Keilson (DE Bar No. 4643)  
500 Delaware Avenue, Suite 1500  
Wilmington, Delaware 19801  
Telephone: (302) 888-6800  
Facsimile: (302) 571-1750  
Email: jwaxman@morrisjames.com  
Email: emonzo@morrisjames.com  
Email: bkeilson@morrisjames.com

**PLEASE TAKE FURTHER NOTICE THAT** a hearing on the Motion is scheduled for **August 19, 2020 at 11:00 a.m. prevailing Eastern Time** before the Honorable Brendan L.

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<sup>1</sup> The Debtors are the following four entities (the last four digits of their respective taxpayer identification number, if any, follow in parentheses): Old LC, Inc. (7119), Old LC Holdings, Inc., Old LCF, Inc., and Old LC Parent, Inc. The Debtors’ noticing address in these Chapter 11 cases is 3401 Pasadena Avenue, Los Angeles, CA 90031.

Shannon, United States Bankruptcy Court for the District of Delaware, by telephone via CourtCall and by video via Zoom.<sup>2</sup>

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

DATED: July 29, 2020

MORRIS JAMES LLP

/s/ Eric J. Monzo

Jeffrey R. Waxman (DE Bar No. 4159)

Eric J. Monzo (DE Bar No. 5214)

Brya M. Keilson (DE Bar No. 4643)

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Email: [bkeilson@morrisjames.com](mailto:bkeilson@morrisjames.com)

*Counsel to the Official Committee of  
Unsecured Creditors*

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<sup>2</sup> All parties wishing to appear must do so telephonically, and register by contacting COURTCALL, LLC at 866-582-6878.

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

In re:

OLD LC, INC., *et al.*,

Debtors.

Chapter 11

Case No. 19-11791 (BLS)  
(Jointly Administered)

**CERTIFICATE OF SERVICE**

I hereby certify that on this 29<sup>th</sup> day of July, 2020, I caused to be filed with the Court electronically, and I caused to be served a true and correct copy of the:

**NOTICE OF MOTION**

upon the parties that are registered to receive notice via the Court's CM/ECF notification system, and additional service was completed via U.S. Mail on the parties listed below.

/s/ Eric J. Monzo  
Eric J. Monzo (DE Bar No. 5214)

| Creditor Name                                                                                                        | Address 1                                                   | Address 2                                                  | Address 3                        | Address 4                       | City              | State | Zip        | Country   |
|----------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|------------------------------------------------------------|----------------------------------|---------------------------------|-------------------|-------|------------|-----------|
| BAYARD P.A                                                                                                           | ATTN: ERIN R. FAY                                           | 600 N. KING STREET                                         |                                  |                                 | WILMINGTON        | DE    | 19806      |           |
| BENSUSSEN DEUTSCH & ASSOCIATES                                                                                       | PO BOX 31001-2214                                           |                                                            |                                  |                                 | PASADENA          | CA    | 91110-2214 |           |
| BIO WORLD MERCHANDISING INC.                                                                                         | 1159 COTTONWOOD LN                                          | ATTN : PETER C. LEWIS AND CHRISTIAN COWART                 |                                  |                                 | IRVING            | TX    | 75038-6107 |           |
| BIO WORLD MERCHANDISING, INC.                                                                                        | C/O SCHEEF & STONE, L.L.P.                                  | ATTN: RICARDO PALACIO                                      | 500 NORTH AKARD                  | STE. 2700                       | DALLAS            | TX    | 75201      |           |
| BREAKWATER CREDIT OPPORTUNITIES FUND, LP, SAIF MANSOUR, AAMIR AMADANI, DARRICK GEANT, ERIC BECKMAN & JOE KACZOROWSKI | C/O ASHBY & GEDDES, P.A.                                    |                                                            | 500 DELAWARE AVE, 8TH FLOOR      | PO BOX 1150                     | WILMINGTON        | DE    | 19899-1150 |           |
| BREAKWATER CREDIT OPPORTUNITIES FUND, LP, SAIF MANSOUR, AAMIR AMADANI, DARRICK GEANT, ERIC BECKMAN & JOE KACZOROWSKI | C/O MORGAN LEWIS & BOCKIUS LLP                              | ATTN: JOHN V. GORMON, JODY C. BARILLARE & KELSEY A. BOMAR  | NEMOURS BUILDING                 | 1007 NORTH ORANGE ST, SUITE 501 | WILMINGTON        | DE    | 19801      |           |
| BRIAN LAIBOW                                                                                                         | C/O MORGAN LEWIS & BOCKIUS LLP                              | ATTN: CRAIG A. WOLFE & JASON R. ALDERSON                   | 101 PARK AVENUE                  |                                 | NEW YORK          | NY    | 10178      |           |
| BUNGIE, INC.                                                                                                         | 573 CHAPALA DRIVE                                           |                                                            |                                  |                                 | PACIFIC PALISADES | CA    | 90272      |           |
| CLEAR FINANCE TECHNOLOGY CORPORATION                                                                                 | C/O MILLER NASH GRAHAM & DUNN LLP                           | ATTN: JOHN R. KNAPP, JR.                                   | PIER 70, 2801 ALASKAN WAY        | SUITE 300                       | SEATTLE           | WA    | 98121      |           |
| DANA NESSEL, ATTORNEY GENERAL & KATHERINE C. KERWIN, ASSISTANT ATTORNEY GENERAL                                      | ATTN: ANDREW D'SOUZA                                        | ATTN: ANDREW D'SOUZA                                       | 548 MARKET STREET                |                                 | SAN FRANCISCO     | CA    | 94104      |           |
| DELAWARE STATE TREASURY                                                                                              | ATTORNEYS FOR THE STATE OF MICHIGAN, DEPARTMENT OF TREASURY | CADILLAC PLACE                                             | STE 10-200                       | 3030 W. GRAND BLVD              | DETROIT           | MI    | 48202      |           |
| DESING INTERNATIONAL GROUP, INC.                                                                                     | 820 SILVER LAKE BOULEVARD                                   | SUITE 100                                                  |                                  |                                 | DOVER             | DE    | 19904      |           |
| FACEBOOK                                                                                                             | C/O DCN HOLDINGS, INC.                                      | 1806 33RD STREET                                           | SUITE 180                        |                                 | ORLANDO           | FL    | 32839      |           |
| FEDEX                                                                                                                | ATTN: ACCOUNTS RECEIVABLE                                   | 15161 COLLECTIONS CENTER DRIVE                             |                                  |                                 | CHICAGO           | IL    | 60693      |           |
|                                                                                                                      | C/O FEDEX CORPORATE SERVICES INC.                           | 3965 AIRWAYS BLVD., MODULE G                               | 3RD FLOOR                        |                                 | MEMPHIS           | TN    | 38116-5017 |           |
| FUNKO, LLC                                                                                                           | C/O MONZACK MERSKY MCLAUGHLIN AND BROWDER, P.A.             | ATTN: RACHEL B. MERSKY                                     | 1201 N. ORANGE ST.               | STE. 400                        | WILMINGTON        | DE    | 19801      |           |
| GEOFFREY ARENS                                                                                                       | C/O DENDERA ADVISORY                                        | 747 THIRD AVENUE                                           | 26TH FLOOR                       |                                 | NEW YORK          | NY    | 10017      |           |
| GLOBAL ONE ACCESSORIES LLC                                                                                           | ATTN: BRANDON MICHAELS                                      | 7 SHAKER HOLLOW ROAD                                       |                                  |                                 | EAST SETAUKET     | NY    | 11733      |           |
| GOLD WING TOYS PRODUCTS LIMITED                                                                                      | ATTN: CHING LAU                                             | 232 DES VOEUX ROAD                                         |                                  |                                 | CENTRAL HONG KONG |       |            | HONG KONG |
| INTERNAL REVENUE SERVICE                                                                                             | PO BOX 7346                                                 |                                                            |                                  |                                 | PHILADELPHIA      | PA    | 19101      |           |
| JACK NADEL INC.                                                                                                      | 8701 BELLANCA AVENUE                                        |                                                            |                                  |                                 | LOS ANGELES       | CA    | 90045      |           |
| JPL ASSOCIATES, INC.                                                                                                 | DBA PROMOTIONAL CONCEPTS TEAM                               | 1250 HALLANDALE BCH BLVD                                   | SUITE 404                        |                                 | HALLANDALE BCH    | FL    | 33009      |           |
| JUST FUNKY, LLC                                                                                                      | 4160 HIGHLANDER PARKWAY                                     | SUITE 100                                                  |                                  |                                 | RICHFIELD         | OH    | 44286      |           |
|                                                                                                                      | C/O GELLERT SCALI BUSENKELL & BROWN, LLC                    | ATTN: RONALD S. GELLERT & AMY D. BROWN                     | 1201 N. ORANGE ST.               | STE. 300                        | WILMINGTON        | DE    | 19801      |           |
| JUST FUNKY, LLC                                                                                                      | 25526 HARDY PL                                              |                                                            |                                  |                                 | STEVENS RANCH     | CA    | 91381      |           |
| K&S SPECIALTY PRODUCTS                                                                                               | ATTN: PETE AUDE                                             | 1900 WEST UNIVERSITY DRIVE                                 | SUITE 101                        |                                 | TEMPE             | AZ    | 85281      |           |
| LANDSBERG ORORA                                                                                                      |                                                             | ATTN: WILLIAM E. CHIPMAN AND MARK D. OLIVERE               |                                  | 1313 NORTH MARKET ST. STE. 5400 | WILMINGTON        | DE    | 19801      |           |
| MAJOR LEAGUE BASEBALL PROPERTIES, INC.                                                                               | C/O CHIPMAN BROWN CICERO & COLE, LLP                        |                                                            | HERCULES PLAZA                   |                                 | BURBANK           | CA    | 91521-9600 |           |
| MLB ADVANCED MEDIA, L.P. AND THE OFFICE OF THE COMMISSIONER OF BASEBALL                                              | 500 SOUTH BUENA VISTA STREET                                |                                                            |                                  |                                 | PHILADELPHIA      | PA    | 19170-7255 |           |
| MARVEL BRANDS                                                                                                        | PO BOX 7247-7255                                            |                                                            |                                  |                                 | NEW YORK          | NY    | 10011      |           |
| MCKINSEY & COMPANY INC. UNITED STATES                                                                                | 75 NINTH AVENUE                                             | ATTN: ROBERT L. EISENBACH, III                             | 101 CALIFORNIA STREET, 5TH FLOOR |                                 | SAN FRANCISCO     | CA    | 94111      |           |
| MLB ADVANCED MEDIA, LP                                                                                               | C/O COOLEY LLP                                              | ATTN: ERIN R. FAY AND DANIEL N. BROGAN                     |                                  |                                 |                   |       |            |           |
| MONEY CHEST                                                                                                          | C/O BAYARD, P.A.                                            | ATTN: CATHY HERSHCOPF, ROBERT WINNING, AND SARAH A. CARNES | 600 N. KING STREET, SUITE 400    |                                 | WILMINGTON        | DE    | 19801      |           |
| MONEY CHEST                                                                                                          | C/O COOLEY LLP                                              |                                                            | 55 HUDSON YARDS                  |                                 | NEW YORK          | NY    | 10001-2157 |           |
| MONEY CHEST LLC                                                                                                      | 8635 WEST SAHARA AVENUE                                     | SUITE 664                                                  |                                  |                                 | LAS VEGAS         | NV    | 89117      |           |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                 |                                                              |                      |                                                                                           |                                        |                                                                  |
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| OFFICE OF THE UNITED STATES TRUSTEE<br>OFFICE OF UNEMPLOYMENT COMPENSATION<br>TAX SERVICES<br>ORACLE AMERICA, INC.<br>PACIFIC CAPITAL MANAGEMENT, LLC<br>PROTIVITI, INC.<br>RR DONNELLEY RECEIVABLES, INC.<br>SECRETARY OF STATE<br>SECURITIES & EXCHANGE COMMISSION<br>SECURITIES & EXCHANGE COMMISSION – NY<br>OFFICE<br>SHANNON HSU<br>SIDEBENCH STUDIO, LLC<br>SIX STAR (HK) LTD. DBA LUCKY GROUP<br>SOMETHING INKED /AIA CORPORATION<br>STATE OF WASHINGTON, DEPARTMENTS OF<br>REVENUE | ATTN: BEN HACKMAN                                                                                                                                                                                                                                                                                                                                                              | 844 KING STREET                                                                                                                                                                 | SUITE 2207                                                   |                      | WILMINGTON                                                                                | DE                                     | 19801                                                            |
| TEXAS COMPTROLLER OF PUBLIC ACCOUNTS<br>TREND SETTERS, LTD.<br>TWENTIETH CENTURY FOX LICENSING AND<br>MERCHANDISING AND MARVEL BRANDS LLC<br>TWENTIETH CENTURY FOX LICENSING AND<br>MERCHANDISING AND MARVEL BRANDS LLC<br>US ATTORNEY'S OFFICE<br>VANTIV, LLC<br>WELLS FARGO                                                                                                                                                                                                               | ATTN: DEB SECREST<br>C/O BUCHALTER<br>ATTN: JONATHAN GLASER<br>12269 COLLECTIONS CENTER DRIVE<br>PO BOX 932721<br>ATTN: DIVISION OF CORPORATIONS<br>SECRETARY OF THE TREASURY<br>ATTN: ANDREW CALAMARI, REGIONAL<br>DIRECTOR<br>C/O DEHSU LLC<br>330 S BARRINGTON AVE<br>ATTN: JENNIFER CAREY<br>222 W COLLEGE AVE FL 9<br>ATTN: DINA L. YUNKER, ASSISTANT<br>ATTORNEY GENERAL | COLLECTIONS SUPPORT UNIT<br>ATTN: SHAWN M. CHRISTIANSON<br>11601 WILSHIRE BLVD.                                                                                                 | 651 BOAS ST, ROOM 925<br>55 SECOND STREET<br>SUITE 2180      | 17TH FL              | HARRISBURG<br>SAN FRANCISCO<br>LOS ANGELES<br>CHICAGO<br>CLEVELAND<br>DOVER<br>WASHINGTON | PA<br>CA<br>CA<br>IL<br>OH<br>DE<br>DC | 17121<br>94105-3493<br>90025<br>60693<br>44193<br>19903<br>20549 |
| NEW YORK<br>NEW YORK<br>LOS ANGELES<br>KOWLOON<br>APPLETON                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                | FRANCHISE TAX<br>100 F STREET, NE                                                                                                                                               | PO BOX 898                                                   |                      |                                                                                           |                                        |                                                                  |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                | 200 VESEY STREET<br>219 GRAND STREET<br>APT 210<br>94 GRANVILLE RAOD                                                                                                            | SUITE 400<br>APT #303                                        |                      | NEW YORK<br>NEW YORK<br>LOS ANGELES                                                       | NY<br>NY<br>CA                         | 10581-1022<br>10013<br>90049-6419                                |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                | 800 FIFTH AVENUE                                                                                                                                                                | TSIM SHA TSUI EAST, SUITE 508                                | INTERNATIONAL PLAZA  |                                                                                           | WI                                     | 54911-5863                                                       |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                 | SUITE 2000<br>BANKRUPTCY & COLLECTIONS<br>DIVISION           |                      | SEATTLE                                                                                   | WA                                     | 98104-3188                                                       |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                | ATTN: CHRISTOPHER S. MURPHY                                                                                                                                                     |                                                              | PO BOX 12548         | AUSTIN<br>TREMONT                                                                         | TX<br>IL                               | 78711-2548<br>61568                                              |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                | ATTN: A. GOLDMAN AND N. MANZER                                                                                                                                                  | 7 WORLD TRADE CENTER<br>1313 NORTH MARKET STREET, 6TH<br>FL. | 250 GREENWICH STREET | NEWYORK                                                                                   | NY                                     | 10007                                                            |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                | ATTN: J. RYAN, R. MCEIL, D. SLAUGH<br>1313 NORTH MARKET STREET<br>8500 GOVERNORS HILL DRIVE<br>5TH FLOOR<br>ATTN: JENNIFER R. HOOVER, KEVIN M.<br>CAPUZZI, AND MATTHEW D. BEEBE | MAIL CODE D1053-05G                                          | PO BOX 951           | WILMINGTON<br>WILMINGTON<br>SYMMES TOWNSHIP<br>CHARLOTTE                                  | DE<br>DE<br>OH<br>NC                   | 19899<br>19801<br>45249-1384<br>28202                            |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                | ANDREW J. SHOULDER, MARK I.<br>DUEDELL, & LEAH FIORENZA MCNEILL<br>NATALIE D. RAMSEY, MARK A. FINK, JAMIE<br>L. EDMONSON                                                        | 222 DELAWARE AVENUE                                          | SUITE 801            | WILMINGTON<br>SPOKANE                                                                     | DE<br>WA                               | 19801<br>99219-9188                                              |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                 | 1201 W. PEACHTREE STREET, NW,<br>14TH FLOOR                  |                      | ATLANTA                                                                                   | GA                                     | 30309-3471                                                       |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                 | 1201 NORTH MARKET STREET SUITE<br>1406                       |                      | WILMINGTON                                                                                | DE                                     | 19801                                                            |
| COUNSEL TO THE DEBTORS                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | BRYAN CAVE LEIGHTON PAISNER                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                 |                                                              |                      |                                                                                           |                                        |                                                                  |
| COUNSEL TO THE DEBTORS                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | ROBINSON & COLE LLC                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                 |                                                              |                      |                                                                                           |                                        |                                                                  |