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UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA

SAN FERNANDO VALLEY DIVISION

In re GLOSTATION USA, INC., a Delaware corporation, Debtor. Federal EIN: 37-1875688	Case No. 1:20-bk-11435-MB Chapter 11 **EMERGENCY MOTION FOR ORDER DIRECTING JOINT ADMINISTRATION OF RELATED CASES; MEMORANDUM OF POINTS AND AUTHORITIES** [Omnibus Declaration of Steven Zhao filed concurrently herewith] Date: [To Be Determined By Court] Time: [To Be Determined By Court] Place: U.S. Bankruptcy Court Courtroom 303 21041 Burbank Blvd. Woodland Hills, CA 90012

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TO THE HONORABLE MARTIN R. BARASH, UNITED STATES BANKRUPTCY JUDGE; THE OFFICE OF THE UNITED STATES TRUSTEE; AND ALL OTHER INTERESTED PARTIES:

EMERGENCY MOTION AND NEED FOR EMERGENCY RELIEF

Glostation USA, Inc., a Delaware corporation, the debtor and debtor in possession in the above-captioned case ("Glostation"), respectfully requests an order directing this case to be jointly administered with the chapter 11 cases of (1) its wholly-owned subsidiary Glostation Core USA, Inc., a Delaware corporation, and (2) nine subsidiaries of Glostation Core USA, Inc., all of whom are in Chapter 11 cases pending before this Court. Each of the following entities has filed an identical motion in its bankruptcy case, as identified below:

Entity	Bankruptcy Case No.
Glostation USA, Inc., a Delaware corporation	1:20-bk-11435-MB
Glostation Core USA, Inc., a Delaware corporation	1:20-bk-11436-VK
Sandbox VR Mission Valley, LLC, a Delaware limited liability company	1:20-bk-11437-MB
Sandbox VR San Mateo, LLC, a Delaware limited liability company	1:20-bk-11438-VK
Sandbox VR Cerritos, LLC, a Delaware limited liability company	1:20-bk-11439-VK
Sandbox VR Topanga, LLC, a Delaware limited liability company	1:20-bk-11434-MB
Sandbox VR Ridge Hill, LLC, a Delaware limited liability company	1:20-bk-11440-MB
Sandbox VR Austin, LLC, a Delaware limited liability company	1:20-bk-11441-MB
Sandbox VR Colony, LLC, a Delaware limited liability company	1:20-bk-11442-VK
Sandbox VR Oakbrook, LLC, a Delaware limited liability company	1:20-bk-11443-MB
Sandbox VR Pop-up, LLC, a Delaware limited liability company	1:20-bk-11444-VK

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The above entities are collectively referred to as the "Debtors". A chart of the Debtors' corporate structure is attached hereto as **Exhibit 1**. Glostation requests that the Debtors' cases be treated as a single case for administrative purposes only, and does not request substantive consolidation of the Debtors' cases at this time.

Glostation requests this relief on an emergency basis because keeping the bankruptcy cases of the Debtors separately administered for the time it would take for this Motion to be heard on regular notice likely would result in the Debtors filing numerous duplicative pleadings in the Debtors' various bankruptcy cases, thereby resulting in unnecessary and avoidable, yet potentially significant, administrative costs.

Moreover, Glostation concurrently is filing several other emergency motions, many of which relate to certain of the other Debtors and, if the Motion is granted prior to hearing those other emergency motions, relief can be obtained efficiently in all 11 of the Debtors' cases without the need for the filing of nearly-identical emergency motions in each. The one emergency motion that *is* separately filed in each of the Debtors' eleven cases is a motion for joint administration, as an order granting that motion will direct interested parties in that bankruptcy case to *this* bankruptcy case, where further information can be obtained. For that reason, Glostation submits that a hearing on this motion should be scheduled on the same date and time as the other emergency motions filed by Glostation.

Glostation respectfully requests that joint administration of the Debtors' estates include:

(a) the use of joint pleadings docket (i.e., the docket established for this case, Case No. 1:20-bk-11435-MB) for the filing of pleadings and the lodging and entry of orders, judgments, and related documents (but excluding schedules of assets and liabilities, statements of financial affairs, Proofs of Claim, requests for payment of administrative expenses, and the notice of joint administration);

(b) the use of a joint pleadings caption;

(c) combined notices to creditors and other parties in interest.

With respect to the joint pleadings docket, Glostation proposes that the docket be maintained in this bankruptcy case. With respect to the joint pleadings caption, Glostation

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proposes, and requests authority, to use the case caption substantially in the form attached hereto as **Exhibit 2**. Glostation further respectfully requests that the Court direct the Clerk of the Court to place a notation in the docket maintained for each of the Debtors' cases to reflect that their cases are being jointly administered.

This motion is brought in accordance with Federal Rule of Bankruptcy Procedure 1015(b) and Local Bankruptcy Rules 1015-1(b) and 9075-1(a), and is made on the grounds that joint administration of the Debtors' cases is appropriate because it will alleviate the necessity for duplicate papers, notices and proceedings before the Court, and thereby minimize costs and ease the administrative burden for the estates, the Court, and interested parties. The Debtors comprise a single business enterprise, are co-obligors on multiple debts, and anticipate that any plan of reorganization will be a joint plan among them.

This motion is based on the attached Memorandum of Points and Authorities, the supporting exhibit(s) attached hereto, the separately filed "Omnibus Declaration of Steven Zhao In Support Of Debtors' "First-Day" Emergency Motions" (the "Omnibus Declaration"), and the arguments of counsel to be made at the hearing on the Motion.

FOR THESE REASONS, Glostation respectfully requests that the Court enter an order:

1. Granting the Motion;

2. Directing the joint administration of the Debtors' Chapter 11 cases as requested herein; and

3. Granting such other relief as the Court deems just and proper.

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DATED: August 13, 2020

Respectfully submitted,

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MEMORANDUM OF POINTS AND AUTHORITIES

I.

BACKGROUND

Glostation incorporates by reference the statements contained in the Omnibus Declaration.

The Debtors are all part of a single business enterprise established to develop, operate, and franchise facilities offering full-body tracking, free roaming, virtual reality experiences for private groups (meaning no strangers can play together), operating under the name "Sandbox VR ™" (the "Business"). The website for the Business is www.sandboxvr.com.

The virtual reality experience the Business provides includes placing customers in enclosed rooms--referred to as a holodeck or "deck"--after outfitting each customer with a virtual reality headset, or “HMD” (head-mounted display), and equipment which transmit information to, and can be read by, various electronic devices that surround the deck. The electronic system can read the customer's position on the deck, and also transmits to the customer a virtual image of the other persons on the deck, as well as a virtual image of what that customer can “see” as that customer moves about the deck. There are no cords, so customers can move around the deck freely.

Currently, customers can choose one of five different "experiences"--a digital gaming experience with a narrative centered around the group of customers. These experiences are either horror-themed, science fiction-themed, or pirate-themed. Because virtual reality technology is still at its inception, there is no limit to the type of experiences that customers could potentially experience using the Debtors' system.

Similar to laser tag or escape rooms, the Debtors provide team-oriented, physical entertainment where teams collaborate to achieve a joint goal. Because these events are social and collaborative, they are ideal for families, small groups, and team outings. Prior to the COVID-19 crisis, the Debtors' locations had seen strong traction as venues for corporate team-building events.

On August 13, 2020 (the "Petition Date"), each of the Debtors filed voluntary petitions under Chapter 11 of the United States Bankruptcy Code. The Debtors' corporate structure

required each of the Debtors to commence an individual bankruptcy case, due to the following:

- Each of the Debtors is a borrower under a $4 million loan issued by Silicon Valley Bank.
- Each of the Debtors is a borrower under an approximately $7 million loan issued by TriplePoint Capital LLC.
- Numerous of the Debtors are parties to leases, and Glostation is a guarantor of each of those leases.
- The Debtors' employees are all employed by the following three Debtor entities: (i) Sandbox VR San Mateo, LLC employs its own retail store staff; (ii) Sandbox VR Pop-Up, LLC employs its own retail store staff, as well as the retail store staff for all other Debtors except San Mateo; and (iii) Glostation employs all non-retail staff.

The Debtors together form a single enterprise. Glostation is the primary operating entity, which indirectly controls, through Glostation Core USA, Inc., the remaining nine debtor entities. Further, Glostation is the licensee of two patents (from a related entity) that the Debtors require in order to operate their business. As such, the Debtors form a single enterprise, share many of the same creditors, and utilize all of the same intellectual property licensed by Glostation, and that makes joint administration of the Debtors' cases appropriate here.

II.

JOINT ADMINISTRATION OF THE DEBTORS' CASES IS APPROPRIATE

Federal Rules of Bankruptcy Procedure 1015(b) authorizes the Court to order joint administration of cases involving two or more related debtors. *See* Fed. R. Bankr. P. 1015(b). Specifically, Rule 1015 provides, in relevant part, as follows:

> (b) *Cases Involving Two or More Related Debtors.* If a joint petition or two or more petitions are pending in the same court by or against (1) a husband and wife, or (2) a partnership and one or more of its general partners, or (3) two or more general partners, or (4) a debtor and an affiliate, the court may order a joint administration of the estates. Prior to entering an order the court shall give consideration to protecting creditors of different estates against potential conflicts of interest. ...
>
> (c) *Expediting and Protective Orders***.** When an order for consolidation or joint administration of a joint case or two or more

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> cases is entered pursuant to this rule, while protecting the rights of the parties under the Code, the court may enter orders as may tend to avoid unnecessary costs and delay.

Fed. R. Bankr. P. 1015(b)-(c) (emphasis added). As stated in the advisory committee notes to Rule 1015,

> Joint administration as distinguished from consolidation may include combining the estates by using a single docket for the matters occurring in the administration, including the listing of filed claims, the combining of notices to creditors of the different estates, and the joint handling of other purely administrative matters that may aid in expediting the cases and rendering the process less costly.

Fed. R. Bankr. P. 1015 Advisory Committee Note (1983).

Joint administration for procedural and administrative matters differs significantly from substantive consolidation, in which the debtors' assets and liabilities are pooled, and the creditors of the separate entities jointly share pro rata in the aggregate net value of the estates. *See In re Standard Brands Paints Co.*, 154 B.R. 563 (Bankr. C.D. Cal. 1993). Joint administration is merely procedural, and has no impact on the substantive rights of creditors. *In re N.S. Garrott & Sons*, 63 B.R. 189, 191 (Bankr. E.D. Ark. 1986). Each creditor may still file its claim against a particular debtor's estate by indicating on the proof of claim the particular debtor against which the claim is being asserted, and may, in any given contested matter, identify the particular debtor against which relief is sought. Each creditor will still maintain its rights against the particular estate which the creditor alleges owes it money.

Joint administration of the Debtors' estates is appropriate here. First, the Debtors are affiliates. Second, joint administration will promote judicial economy. Third, there is no other conflict that would hinder or interfere with joint administration.

A. <u>The Debtors are "Affiliates"</u>

Under the Bankruptcy Code, an "affiliate" includes, among other things, a

> corporation 20 percent or more of whose outstanding voting securities are directly or indirectly owned, controlled, or held with power to vote . . . by an entity that directly or indirectly owns, controls, or holds with power to vote, 20 percent or more of the outstanding voting securities of the debtor, other than an entity that holds such securities—(i) in a fiduciary or agency capacity without sole discretionary power to vote such securities; or (ii) solely to

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> secure a debt, if such entity has not in fact exercised such power to vote.

11 U.S.C. § 101(2)(B). The term "entity" includes "person." 11 U.S.C. § 101(15). As is visually represented in the attached Exhibit 1, Glostation owns 100% of Glostation Core USA, Inc. and Glostation Core USA, Inc. is the 100% owner of each of the other Debtors. None of those owners hold their securities "in a fiduciary or agency capacity without voting power or solely to secure debt." Accordingly, each of the Debtors are "affiliates" as defined by the Bankruptcy Code.

B. Joint Administration Will Promote Judicial Economy

Joint administration will promote the economic interest of the Debtors' estates and facilitate judicial administration because of the nature and relationship among the Debtors. In fact, the Debtors have prepared and filed a consolidated master mailing list and list of top 30 general unsecured creditors given there is significant overlap in the Debtors' creditor bodies.[1] Moreover, the success of their respective cases will require a joint effort among the Debtors.

Furthermore, joint administration of the Debtors' cases will promote judicial economy and render the judicial process less costly for all creditors and parties in interest by alleviating the necessity for duplicate papers, notices and proceedings before the Court. The clerk's office will be relieved of the burden of having to maintain separate pleadings' files and separate dockets with duplicative entries, while the Debtors will be relieved of duplicative noticing and excessive copying costs associated with separate service of identical pleadings in each of the Debtors' cases. Creditors will only need to review a single pleading and docket to determine the case status versus having to review pleadings and dockets in each of the two pending cases. Supervision of administrative aspects of the Debtors' Chapter 11 cases by the Office of the United States Trustee will also be simplified.

For the same reasons set forth above, joint administration of the Debtors' estates is also consistent with Rule 1001, which provides, in relevant part, that "[t]hese rules shall be construed to secure the just, speedy and inexpensive determination of every case and proceeding." Fed. R.

[1] Concurrently, the Debtors are filing a motion to file a consolidated master mailing list and list of top 30 general unsecured creditors in the proposed lead case.

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Bankr. P. 1001.

C. Other Considerations

The Debtors are unaware of any present existing actual conflicts among their estates that would hinder or interfere with joint administration or prejudice creditors of their estates by reason of joint administration. The Debtors operate a single business enterprise. They are each owned by a single ultimate interest holder, Sandbox VR, Inc., which has a 100% direct or indirect interest in each of the Debtors. While certain of the Debtors may have intercompany claims against other Debtors, that is a result of the enterprise's cash management system and not reflective of conflicting interests among various debtor parties. Further, the relief sought is purely procedural and is not intended to affect substantive rights. In the event that a conflict arises in the future by reason of joint administration, the Court can fashion an appropriate remedy at that time, pursuant to Rule 1015(c), to protect creditors and interest holders.

In fact, joint administration may actually serve to protect the interests of parties who are creditors of one or more of the Debtors. Due to the close relationship among the Debtors, any actions taken by or against one of the Debtors likely will affect the other Debtors, at least indirectly. Thus, a party who is an "interested party" with respect to one of the Debtors likely will be an "interested party" with respect to the other Debtors. Joint administration of the cases will permit interested parties to monitor a single docket, and will increase the likelihood that all interested parties will receive notices of all matters that may affect them either directly or indirectly.

III.

PROPOSED PROCEDURE

Glostation respectfully requests that joint administration of the Debtors' estates include:

(a) the use of joint pleadings docket (i.e., the docket established for the case of Glostation, case no. 1:20-bk-11435-MB) for the filing of pleadings and the lodging and entry of orders, judgments, and related documents (but excluding schedules of assets and liabilities, statements of financial affairs, Proofs of Claim, requests for payment of administrative expenses, and the notice of joint administration);

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(b) the use of a joint pleadings caption; and

(c) combined notices to creditors and other parties in interest.

With respect to the joint pleadings docket, Glostation proposes that the docket be maintained in the bankruptcy case of Glostation USA, Inc. With respect to the joint pleadings caption, the Glostation proposes, and requests authority, to use the case caption substantially in the form attached hereto as **Exhibit 2**.

If the Court grants this motion, Glostation will file and serve a notice substantially identical to that attached hereto as **Exhibit 3** (or other form ordered by the Court) to all creditors advising them of the joint administration. Glostation further requests that the Court direct the Clerk of the Court to place a notation, such as the following notation, in the docket maintained for each of the Debtors' cases to reflect that their cases are being jointly administered:

> An order has been entered in this case directing the joint administration of the Chapter 11 cases of Glostation USA, Inc. (case no. 1:20-bk-11435-MB), Glostation Core USA, Inc. (case no. 1:20-bk-11436-VK), Sandbox VR Mission Valley, LLC (case no. 1:20-bk-11437-MB), Sandbox VR San Mateo, LLC (case no. 1:20-bk-11438-VK), Sandbox VR Cerritos, LLC (case no. 1:20-bk-11439-VK), Sandbox VR Topanga, LLC (case no. 1:20-bk-11434-MB), Sandbox VR Ridge Hill, LLC (case no. 1:20-bk-11440-MB), Sandbox VR Austin, LLC (case no. 1:20-bk-11441-MB), Sandbox VR Colony, LLC (case no. 1:20-bk-11442-VK), Sandbox VR Oakbrook, LLC (case no. 1:20-bk-11443-MB), and Sandbox Pop-Up, LLC (case no. 1:20-bk-11444-VK) for procedural/ administrative purposes only. The docket in the case of Glostation USA, Inc., case no. 1:20-bk-11435-MB, should be consulted for all matters affecting all such cases, except that the clerk of the Court shall maintain a separate claims register for each case, and parties shall file any Proofs of Claim and/or requests for payment of administrative expenses in the case of the particular debtor from whom payment is sought.

IV.

CONCLUSION

For the reasons set forth above, Glostation respectfully requests that the Court enter an order (i) granting the Motion; (ii) directing the joint administration of the Debtors' Chapter 11 cases as requested herein; and (iii) granting such other relief as the Court deems just and proper.

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DATED: August 13, 2020

Respectfully submitted,

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EXHIBIT 1

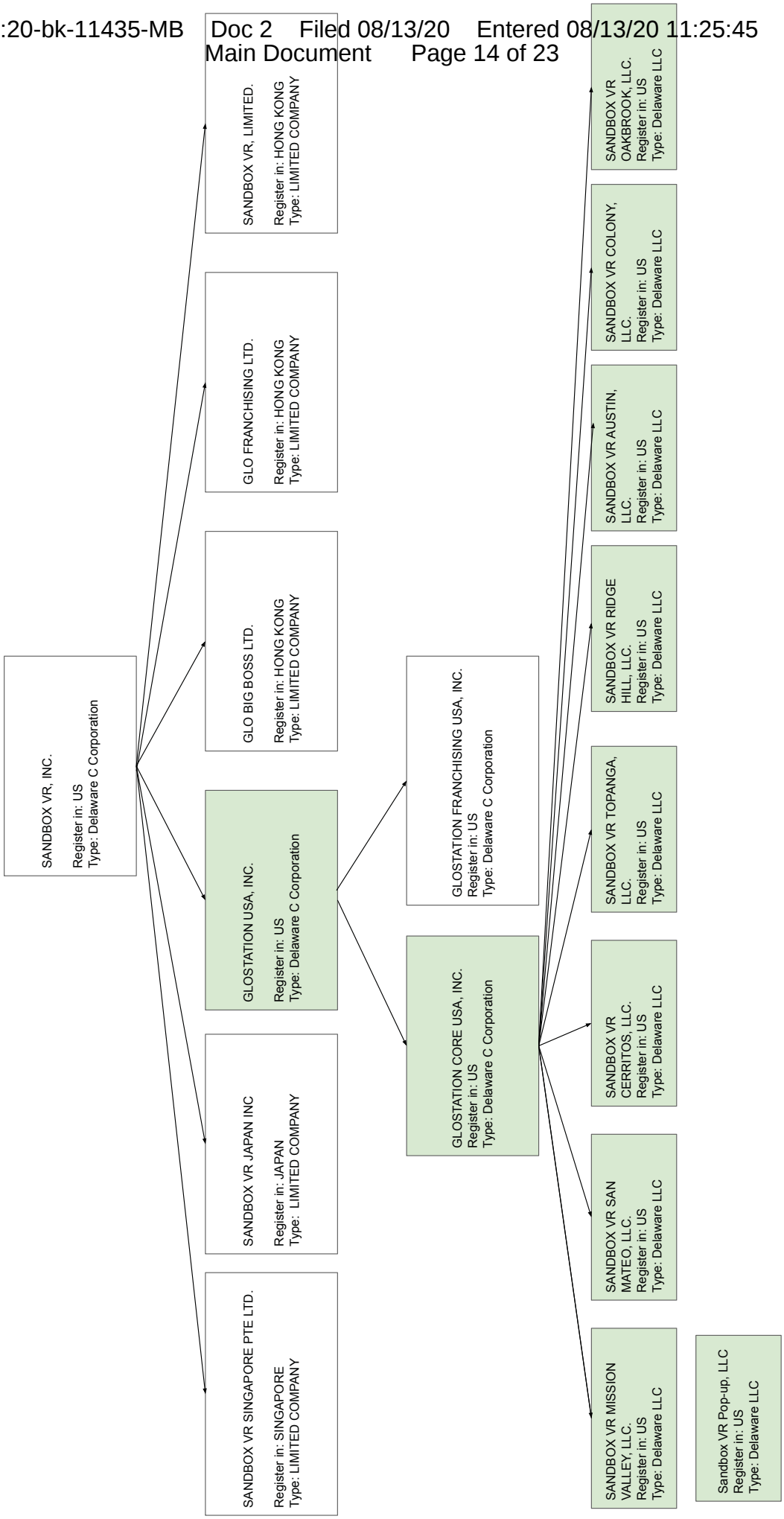

SANDBOX VR, INC.
Register in: US
Type: Delaware C Corporation
SANDBOX VR, LIMITED.
Register in: HONG KONG
Type: LIMITED COMPANY
GLO FRANCHISING LTD.
Register in: HONG KONG
Type: LIMITED COMPANY
GLO BIG BOSS LTD.
Register in: HONG KONG
Type: LIMITED COMPANY
GLOSTATION USA, INC.
Register in: US
Type: Delaware C Corporation
SANDBOX VR JAPAN INC
Register in: JAPAN
Type: LIMITED COMPANY
SANDBOX VR SINGAPORE PTE LTD.
Register in: SINGAPORE
Type: LIMITED COMPANY
GLOSTATION FRANCHISING USA, INC.
Register in: US
Type: Delaware C Corporation
GLOSTATION CORE USA, INC.
Register in: US
Type: Delaware C Corporation
SANDBOX VR OAKBROOK, LLC.
Register in: US
Type: Delaware LLC
SANDBOX VR COLONY, LLC.
Register in: US
Type: Delaware LLC
SANDBOX VR AUSTIN, LLC.
Register in: US
Type: Delaware LLC
SANDBOX VR RIDGE HILL, LLC.
Register in: US
Type: Delaware LLC
SANDBOX VR TOPANGA, LLC.
Register in: US
Type: Delaware LLC
SANDBOX VR CERRITOS, LLC.
Register in: US
Type: Delaware LLC
SANDBOX VR SAN MATEO, LLC.
Register in: US
Type: Delaware LLC
SANDBOX VR MISSION VALLEY, LLC.
Register in: US
Type: Delaware LLC
Sandbox VR Pop-up, LLC
Register in: US
Type: Delaware LLC

EXHIBIT 2

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UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA

SAN FERNANDO VALLEY DIVISION

In re GLOSTATION USA, INC., a Delaware corporation, Debtor and Debtor in Possession. Federal EIN: 37-1875688	Case No. 1:20-bk-11435-MB Chapter 11 (Jointly Administered with Case Nos. 1:20-bk-11436-VK 1:20-bk-11437-MB 1:20-bk-11438-VK 1:20-bk-11439-VK 1:20-bk-11434-MB 1:20-bk-11440-MB 1:20-bk-11441-MB 1:20-bk-11442-VK 1:20-bk-11443-MB 1:20-bk-11444-VK)
In re GLOSTATION CORE USA, INC., a Delaware corporation, Debtor and Debtor in Possession. Federal EIN: 37-1878675	**[TITLE OF PLEADING]** Date: Time: Place: U.S. Bankruptcy Court Courtroom 21041 Burbank Blvd. Woodland Hills, CA 91367
In re SANDBOX VR MISSION VALLEY, LLC, a Delaware limited liability company, Debtor and Debtor in Possession. Federal EIN: 83-2058276	

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In re

SANDBOX VR SAN MATEO, LLC, a Delaware limited liability company,

Debtor and Debtor in Possession.

Federal EIN: 83-2027702

In re

SANDBOX VR CERRITOS, LLC, a Delaware limited liability company,

Debtor and Debtor in Possession.

Federal EIN: 83-2558471

In re

SANDBOX VR TOPANGA, LLC, a Delaware limited liability company,

Debtor and Debtor in Possession.

Federal EIN: 83-2063050

In re

SANDBOX VR RIDGE HILL, LLC, a Delaware limited liability company,

Debtor and Debtor in Possession.

Federal EIN: 83-2686743

In re

SANDBOX VR AUSTIN, LLC, a Delaware limited liability company,

Debtor and Debtor in Possession.

Federal EIN: 83-3226478

In re

SANDBOX VR COLONY, LLC, a Delaware limited liability company,

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Debtor and Debtor in Possession. Federal EIN: 83-3904100
In re SANDBOX VR OAKBROOK, LLC, a Delaware limited liability company, Debtor and Debtor in Possession. Federal EIN: 83-3918848
In re SANDBOX VR POP-UP, LLC, a Delaware limited liability company, Debtor and Debtor in Possession. Federal EIN: 84-2673638
☐ Affects all Debtors ☐ Affects Glostation USA, Inc. only ☐ Affects Glostation Core USA, Inc. only ☐ Affects Sandbox VR Mission Valley, LLC only ☐ Affects Sandbox VR San Mateo, LLC only ☐ Affects Sandbox VR Cerritos, LLC only ☐ Affects Sandbox VR Topanga, LLC only ☐ Affects Sandbox VR Ridge Hill, LLC only ☐ Affects Sandbox VR Austin, LLC only ☐ Affects Sandbox VR Colony, LLC only ☐ Affects Sandbox VR Oakbrook, LLC only ☐ Affects Sandbox VR Pop-Up, LLC only

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EXHIBIT 3

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address
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☐ *Individual appearing without attorney*
☒ *Attorney for:* Glostation USA, Inc. and related entities

FOR COURT USE ONLY

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA - SAN FERNANDO VALLEY DIVISION

In re:
GLOSTATION USA, INC., a Delaware corporation,

Debtor

In re:
GLOSTATION CORE USA, INC., a Delaware corporation,

Debtor

In re:

SANDBOX VR MISSION VALLEY, LLC, a Delaware limited liability company,

Debtor

LEAD CASE NO.: 1:20-bk-11435-MB

CHAPTER: 11

JOINTLY ADMINISTERED WITH CASE NOS:

1:20-bk-11436-VK
1:20-bk-11437-MB
1:20-bk-11438-VK
1:20-bk-11439-VK
1:20-bk-11434-MB
1:20-bk-11440-MB
1:20-bk-11441-MB
1:20-bk-11442-VK
1:20-bk-11443-MB
1:20-bk-11444-VK

In re:

SANDBOX VR SAN MATEO, LLC, a Delaware limited liability company,

Debtor

In re:

SANDBOX VR CERRITOS, LLC, a Delaware limited liability company,

Debtor

In re:

SANDBOX VR TOPANGA, LLC, a Delaware limited liability company,

Debtor

In re:

SANDBOX VR RIDGE HILL, LLC, a Delaware limited liability company,

Debtor

In re:

SANDBOX VR AUSTIN, LLC, a Delaware limited liability company,

Debtor

In re:

SANDBOX VR COLONY, LLC, a Delaware limited liability company,

Debtor

In re:

SANDBOX VR OAKBROOK, LLC, a Delaware limited liability company,

Debtor

NOTICE OF JOINT ADMINISTRATION OF CASES AND REQUIREMENTS FOR FILING DOCUMENTS

[LBR 1015-1]

In re SANDBOX VR POP-UP, LLC, a Delaware limited liability company, Debtor	
☐ Affects All Debtors ☐ Affects Glostation USA, Inc. only ☐ Affects Glostation Core USA, Inc. only ☐ Affects Sandbox VR Mission Valley, LLC only ☐ Affects Sandbox VR San Mateo, LLC only ☐ Affects Sandbox VR Cerritos, LLC only ☐ Affects Sandbox VR Topanga, LLC only ☐ Affects Sandbox VR Ridge Hill, LLC only ☐ Affects Sandbox VR Austin, LLC only ☐ Affects Sandbox VR Colony, LLC only ☐ Affects Sandbox VR Oakbrook, LLC only ☐ Affects Sandbox VR Pop-Up, LLC only	[No Hearing Required]
Debtor(s)	

TO: THE U.S. TRUSTEE AND ALL PARTIES IN THESE JOINTLY ADMINISTERED CASES: An order was entered on (*date*) _____ granting a motion to approve joint administration of cases pursuant to FRBP 1015 and LBR 1015-1, under the lead case indicated in the caption of this notice.

1. **Required Caption on Documents** – All documents filed must contain a caption in substantially the same format and content as the caption of this notice.

2. **Debtors Affected by a Filed Document** – All documents filed must indicate, by checking appropriate boxes, the debtor or debtors affected by the filed document.

3. **Filing Documents on Main Case Docket** – Unless indicated below in paragraph 4, all documents must be filed on the docket of the lead case indicated on the caption of this notice.

4. **Filing Proof of Claims on Docket of Individual Case** – Notwithstanding joint administration of these cases, creditors must file their respective proofs of claim as to the specific affected and applicable debtor using the case number and claim register for the specific affected and applicable debtor.

5. **Parties to File a Request to be Added to Courtesy NEF** – To facilitate notice and service of documents via Notice of Electronic Filing, all parties who previously electronically filed documents only in cases other than the lead case must promptly file in the lead case a Request to be Added to Courtesy Notice of Electronic Filings, using the court- approved form.

6. **Other**:

Date: August , 2020

By: _____
Signature
David S. Kupetz
Steven F. Werth
Claire K. Wu
Attorneys for Glostation USA, Inc., Debtor and Debtor in Possession