

STATE OF MINNESOTA  
COUNTY OF HENNEPIN

DISTRICT COURT  
FOURTH JUDICIAL DISTRICT  
Case Type: Other/Civil

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In re:

Assignment for the Benefit of Creditors of  
Young America, LLC

Court File No. 27-CV-20-11191  
Hon. Joseph R. Klein

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**NOTICE OF MOTION AND MOTION REGARDING  
PROCEDURAL ISSUES**

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To: All parties on Master Service List

**PLEASE TAKE NOTICE** that on Thursday, November 5, 2020, via video conference before the Honorable Joseph R. Klein, Judge of the District Court, at 9:00 a.m., or as soon thereafter as counsel may be heard, YA ABC, LLC, the assignee in the above-captioned matter (the “Assignee”), will request an order of the Court (1) establishing a creditor claims procedure, (2) determining the sum and conditions of the Assignee bond, if any, (3) authorizing the terms of the Assignee’s compensation, (4) authorizing the abandonment of property, (5) extending the statutory stay for an additional ninety (90) days to allow the Assignee to conduct its work, and (6) granting such other relief as the Court may deem just and proper. This motion is supported by a memorandum of law and a proposed order filed concurrently herewith.

**PLEASE TAKE FURTHER NOTICE** that the hearing on this motion will be conducted by Zoom videoconference. Information for attending the hearing by Zoom videoconference is as follows:

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**PLEASE TAKE FURTHER NOTICE** that, pursuant to Minn. Gen. R. Prac. 115.03, any response to this motion must be filed and served at least fourteen (14) days prior to the hearing. **UNLESS A RESPONSE OPPOSING THE MOTION IS TIMELY FILED, THE COURT MAY GRANT THE MOTION AND PROPOSED ORDER WITHOUT A HEARING PURSUANT TO MINN. STAT §576.35.**

Dated: September 23, 2020

**STINSON LLP**

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