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COUNSEL FOR THE DEBTORS
AND DEBTORS-IN-POSSESSION

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

In re:	§	**Chapter 11**
	§	
SPHERATURE INVESTMENTS LLC, *et al.*	§	**Case No.: 20-42492**
	§	
	§	
Debtors.[1]	§	**Jointly Administered**

AGENDA FOR MATTERS SCHEDULED FOR HEARING ON OCTOBER 21, 2021

MATTERS GOING FORWARD:

1. **Pleading:** *Emergency Motion for Interim and Final Orders Granting Use of Cash Collateral and Scheduling Final Hearing* (the "**Cash Collateral Motion**") [Docket No. 18]

Moving Party: Debtors

Responses/Objections Received:

a. *Montgomery Capital Advisers, LLC's Objection to Debtors' Emergency Motion for Interim and Final Orders Granting Use of Cash Collateral and Scheduling Final Hearing* [Docket No. 216]

b. *Montgomery Capital Advisers, LLC's Amended Objection to Debtors' Emergency Motion for Interim and Final Orders Granting Use of Cash Collateral and Scheduling Final Hearing* [Docket No. 218]

Related Document(s):

a. *First Interim Order Authorizing Debtors' Use of Cash Collateral and*

[1] The "**Debtors**" in the above-captioned jointly administered chapter 11 bankruptcy cases ("**Cases**") are: Spherature Investments LLC EIN#5471; Rovia, LLC EIN#7705; WorldVentures Marketing Holdings, LLC EIN#3846; WorldVentures Marketplace, LLC EIN#6264; WorldVentures Marketing, LLC EIN#3255; WorldVentures Services, LLC EIN#2220.

Granting Adequate Protection and Related Relief [Docket No. 55]

b. *Second Interim Order Authorizing Debtors' Use of Cash Collateral and Granting Adequate Protection and Related Relief* [Docket No. 97]

c. *Third Interim Order Authorizing Debtors' Use of Cash Collateral and Granting Adequate Protection and Related Relief* [Docket No. 136]

d. *Fourth Interim Order Authorizing Debtors' Use of Cash Collateral and Granting Adequate Protection and Related Relief* [Docket No. 241]

e. *Fifth Interim Order Authorizing Debtors' Use of Cash Collateral and Granting Adequate Protection and Related Relief* [Docket No. 308]

f. *Sixth Interim Order Authorizing Debtors' Use of Cash Collateral and Granting Adequate Protection and Related Relief* [Docket No. 356]

g. *Seventh Interim Order Authorizing Debtors' Use of Cash Collateral and Granting Adequate Protection and Related Relief* [Docket No. 382]

h. *Eighth Interim Order Authorizing Debtors' Use of Cash Collateral and Granting Adequate Protection and Related Relief* [Docket No. 425]

i. *Notice of Revised Proposed Order [Docket No. 481]*

j. *Amended Notice of Hearing filed by Spherature Investments LLC* [Docket No. 147]

k. *Agreed Motion to Continue March 16, 2021 Hearing* [Docket No. 171]

l. *Order Granting Motion to Continue March 16, 2021 Hearing* [Docket No. 174]

m. *Amended Notice of Hearing filed by Spherature Investments LLC* [Docket No. 175]

n. *Exhibit and/or Witness List filed by Montgomery Capital Advisers, LLC* [Docket No. 191]

o. *Exhibit and/or Witness List filed by Official Committee of Unsecured Creditors* [Docket No. 193]

p. *Exhibit and/or Witness List filed by Spherature Investments LLC* [Docket No. 195]

q. *Agreed Motion to Continue March 25, 2021 Hearing* [Docket No. 197]

r. *Order Granting Motion to Continue March 25, 2021 Hearing* [Docket No. 202]

s. *Amended Notice of Hearing filed by Spherature Investments LLC* [Docket No. 203]

t. *Exhibit and/or Witness List filed by Official Committee of Unsecured Creditors* [Docket No. 210]

u. *Exhibit and/or Witness List filed by Montgomery Capital Advisers, LLC* [Docket No. 211]

v. *Exhibit and/or Witness List filed by Spherature Investments LLC* [Docket No. 213]

w. *Amended Exhibit and/or Witness List filed by Spherature Investments LLC* [Docket No. 215]

x. *Amended Exhibit and/or Witness List filed by Official Committee of Unsecured Creditors* [Docket No. 219]

y. *Debtors' Witness and Exhibit List* [Docket No. 230]

z. *Montgomery Capital Advisers, LLC's Witness and Exhibit List* [Docket No. 231]

aa. *Witness and Exhibit List filed by Seacret Direct, LLC* [Docket No. 232]

bb. *Notice of Filing Witness and Exhibit List for April 16, 2021 Hearing* [Docket No. 233]

cc. *Agreed Motion to Continue April 16, 2021 Hearing* [Docket No. 234]

dd. *Notice of Hearing* [Docket No. 237]

ee. *Witness and Exhibit List filed by Seacret Direct, LLC* [Docket No. 261]

ff. *Debtors' Witness and Exhibit List* [Docket No. 262]

gg. *Montgomery Capital Advisers, LLC's Witness and Exhibit List* [Docket No. 263]

hh. *Notice of Filing Witness and Exhibit List for June 8, 2021 Hearing filed by Official Committee of Unsecured Creditors* [Docket No. 294]

ii. *Witness and Exhibit List filed by Seacret Direct, LLC* [Docket No. 295]

jj. *Montgomery Capital Advisers, LLC's Witness and Exhibit List* [Docket No. 296]

kk. *Witness and Exhibit List for Hearing on June 22, 2021 filed by the Official Committee of Unsecured Creditors* [Docket No. 314]

ll. *Witness and Exhibit List filed by Seacret Direct, LLC* [Docket No. 315]

mm. *Debtors' Witness and Exhibit List* [Docket No. 316]

nn. *Amended Debtors' Witness and Exhibit List* [Docket No. 319]

oo. *Debtors' Witness List and Exhibit List* [Docket No. 352]

pp. *Witness and Exhibit List filed by Official Committee of Unsecured Creditors* [Docket No. 353]

qq. *Agreed Motion to Continue July 28, 2021 Hearing* [Docket No. 380]

rr. *Order Granting Motion to Continue July 28, 2021 Hearing* [383]

ss. *Montgomery Capital Advisers, LLC's Witness and Exhibit List* [Docket No. 408]

tt. *Notice of Filing of Witness and Exhibit List for September 2 Hearing filed by the Official Committee of Unsecured Creditors* [Docket No. 409]

uu. *Notice of Filing of Debtors' Witness and Exhibit List for September 2, 2021 Hearing* [Docket No. 409]

vv. *Certificates of Service* [Docket Nos. 27, 29, 44, 63, 100, 156, 157, 165, 220, 246, 309, 364, 391, 431, and 505]

ww. *Witness and Exhibit List for Hearing filed by the Official Committee of Unsecured Creditors* [Docket No. 479]

xx. *Debtors' Witness List and Exhibit List* [Docket No. 479]

yy. *Notice of Revised Cash Collateral Budget* [Docket No. 486]

zz. *Ninth Interim Order Authorizing Debtors' Use of Cash Collateral and Granting Adequate Protection and Related Relief* [Docket No. 499]

Status: Debtors and Montgomery Capital Advisers, LLC have reached a settlement and are in discussions regarding this motion.

2. **Pleading:** *Motion to Compel Assumption or Rejection of Limited Solicitation Agreement filed by Seacret Direct, LLC* [Docket No. 494]

Moving Party: Seacret Direct, LLC

Responses/Objections Received:

a. *Debtors' Objection to Motion to Compel Assumption or Rejection of Limited Solicitation Agreement* [Docket No. 531]

Related Document(s):

a. *Motion for Expedited Hearing on Seacret Direct, LLC 's Expedited Motion to Compel Assumption or Rejection of Limited Solicitation Agreement* [Docket No. 495]

b. *Order Granting Seacret Direct, LLC's Motion for Expedited Hearing on Seacret Direct, LLC's Motion to Compel Assumption or Rejection of Limited Solicitation Agreement* [Docket No. 516]

c. *Notice of Hearing* [Docket No. 520]

d. *Witness and Exhibit List filed by Seacret Direct, LLC* [Docket No. 529]

e. *Notice of Hearing* [Docket No. 541]

f. *Certificates of Service* [Docket Nos. 496, 497, 521, 551 and 545]

g. *Witness and Exhibit List filed by the Official Committee of Unsecured Creditors* [Docket No. 554]

h. *Witness and Exhibit List filed by Verona International Holdings, Inc.'s for Combined Hearing on October 21, 2021* [Docket No. 557]

i. *Witness and Exhibit List filed by Janie Braun, Braun Marketing Company, Matt Morris, Rhonda Morris, Dr. Troy Brown, Kathy Brown, Kari Schneider, Lisha Schneider, Byron Schrag, and Martin Ruof* [Docket No. 561]

j. *Amended Witness and Exhibit List filed by the Official Committee of Unsecured Creditors* [Docket No. 566]

Status: The hearing regarding this Motion will be going forward.

3. Pleading: *Fourth Amended Joint Chapter 11 Pan for Spherature Investments LLC and Its Debtor Affiliates* [Docket No. 459]

Moving Party: Debtors

Responses/Objections Received:

a. *Limited Response and Reservation of Rights of Amazon Web Services to Schedule of Assumed Executory Contracts and Unexpired Leases* [Docket No. 508]

b. *Joinder in Objection of Seacret Direct, LLC to Fourth Amended Joint Chapter 11 Plan for Spherature Investments LLC and Its Debtor Affiliates and Final Approval of the Disclosure Statement for the Fourth Amended Joint Chapter 11 Plan of Spherature Investments LLC and Its Debtor Affiliates and Additional Objection to Confirmation of Debtors' Chapter 11 Plan* [Docket No. 535]

c. *Objection of Seacret Direct, LLC to Fourth Amended Joint Chapter 11 Plan for Spherature Investments LLC and Its Debtor Affiliates and Final Approval of the Disclosure Statement for the Fourth Amended Joint Chapter 11 Plan of Spherature Investments LLC and Its Debtor Affiliates* [Docket No. 536]

d. *Wayne Nugent, KGS Services, LLC and Nugent Holdings, LLC's Objection to the Debtors' Proposed Disclosure Statement and Fourth Amended Joint Chapter 11 Plan for Spherature Investments LLC and Its Debtor Affiliates* [Docket No. 537]

e. *Kenneth E. Head's Limited Objection to the Fourth Amended Joint Chapter 11 Plan* [Docket No. 538]

f. *Objection of Melody Yiru to Fourth Amended Joint Chapter 11 Plan for Spherature Investments LLC and Its Debtor Affiliates and Final Approval of the Disclosure Statement for the Fourth Amended Joint Chapter 11 Plan of Spherature Investments, LLC and Its Debtor Affiliates* [Docket No. 540]

g. *The Official Committee of Unsecured Creditors' Statement, Comments and Reservations of Rights with Respect to the Fourth Amended Joint*

Chapter 11 Plan and Disclosure Statement for Spherature Investments LLC and Its Debtor Affiliates [Docket No. 576]

h. *The Braun Creditors' Joinder in Objection of Seacret Direct, LLC to Fourth Amended Joint Chapter 11 Plan for Spherature Investments LLC and Its Debtor Affiliates and Final Approval of the Disclosure Statement for the Fourth Amended Joint Chapter 11 Plan of Spherature Investments LLC and Its Debtor Affiliates and Additional Objection to Confirmation of Debtors' Chapter 11 Plan* [Docket No. 580]

i. *Additional Creditors' Joinder in Objection of Seacret Direct, LLC to Fourth Amended Joint Chapter 11 Plan for Spherature Investments LLC and Its Debtor Affiliates and Final Approval of the Disclosure Statement for the Fourth Amended Joint Chapter 11 Plan of Spherature Investments LLC and Its Debtor Affiliates and Additional Objection to Confirmation of Debtors' Chapter 11 Plan* [Docket No. 581]

Related Document(s):

a. *Third Amended Joint Chapter 11 Pan for Spherature Investments LLC and Its Debtor Affiliates* [Docket No. 445]

b. *Disclosure Statement for Third Amended Joint Chapter 11 Plan of Spherature Investments LLC and Its Debtor Affiliates* [Docket No. 446]

c. *Notice of Filing of Third Amended Joint Chapter 11 Plan and Disclosure Statement for Third Amended Joint Chapter 11 Plan for Spherature Investments LLC and Its Debtor Affiliates* [Docket No. 447]

d. *Order: (I) Conditionally Approving Disclosure Statement; (II) Establishing Procedures for Solicitation and Tabulation of Votes on Plan; (III) Establishing Procedures for Submission of Topping Bids; (IV) Approving Certain Forms and Notices; (V) Scheduling a Combined Hearing on Final Approval of Disclosure Statement and Confirmation of Plan; and (VI) Granting Related Relief* [Docket No. 448]

e. *Affidavit of Publication of the Notice of Combined Hearing and Deadline to Debtors' Plan Filed in Direct Selling News* [Docket No. 455]

f. *Affidavit of Publication of the Notice of Combined Hearing and Deadline to Debtors' Plan filed in USA Today* [Docket No. 456]

g. *Fourth Amended Joint Chapter 11 Pan for Spherature Investments LLC and Its Debtor Affiliates* [Docket No. 459]

h. *Disclosure Statement for Fourth Amended Joint Chapter 11 Pan for Spherature Investments LLC and Its Debtor Affiliates* [Docket No. 460]

i. *Notice of Filing of Fourth Amended Joint Chapter 11 Plan and Disclosure Statement for Fourth Amended Joint Chapter 11 Plan for Spherature Investments LLC and Its Debtor Affiliates* [Docket No. 461]

j. *Notice of Plan Supplement* [Docket No. 483]

k. *Notice to Contract Counterparties of Assumption, or Assumption and Assignment of Executory Contracts and Unexpired Leases* [Docket No. 484]

l. *Notice of No Auction with Respect to the Sale of Substantially All of the Debtors' Assets* [Docket No. 485]

m. *Notice of Supplement to Plan Supplement* [Docket No. 501]

n. *Notice of Filing of Amended Redline of Disclosure Statement for Fourth Amended Joint Chapter 11 Plan for Spherature Investments LLC and Its Debtor Affiliates* [Docket No. 528]

o. *Amended Notice to Contract Counterparties of Assumption, or Assumption and Assignment of Executory Contracts and Unexpired Leases* [Docket No. 550]

p. *Witness and Exhibit List filed by the Official Committee of Unsecured Creditors* [Docket No. 554]

q. *Witness and Exhibit List filed by Seacret Direct, LLC* [Docket No. 555]

r. *Montgomery Capital Advisers, LLC's Witness and Exhibit List* [Docket No. 556]

s. *Witness and Exhibit List of Verona International Holdings, Inc.'s for Combined Hearing on October 21, 2021* [Docket No. 557]

t. *Debtors' Witness and Exhibit List* [Docket No. 559]

u. *Witness and Exhibit List filed by Wayne Nugent, KGS Services, LLC and Nugent Holdings, LLC* [Docket No. 560]

v. *Certificates of Service* [Docket Nos. 451, 465, 469, 487, 488, 489, 498, 503, 511, 533, 542, and 545]

w. *Voting Declaration of Stretto Regarding Tabulation of Votes in Connection with the Plan for Spherature Investments LLC and Its Debtor Affiliates* [Docket No. 562]

x. *Amended Witness and Exhibit List filed by the Official Committee of Unsecured Creditors* [Docket No. 566]

y. *Second Amended Notice to Contract Counterparties of Assumption, or Assumption and Assignment of Executory Contracts and Unexpired Leases* [Docket No. 570]

z. *Notice of Supplement to Plan Supplement* [Docket No. 571]

aa. *Microsoft's Response to Notices to Contract Counterparties of Assumption (Documents No. 570, 550, 484, 483)* [Docket No. 582]

bb. *Debtors' Amended Witness and Exhibit List* [Docket No. 585]

cc. *Seacret Direct, LLC's Confirmation Brief* [Docket No. 587]

Status: The hearing regarding this matter will be going forward.

4. Pleading: *Debtors' Motion to Approve Immaterial Modifications to the Debtors' Third Amended Chapter 11 Plan of Reorganization* [Docket No. 476]

Moving Party: Debtors

Responses/Objections Received:

a. *Objection to Debtors' Motion to Approve Immaterial Modifications to the Debtors' Third Amended Chapter 11 Plan of Reorganization* filed by Seacret Direct, LLC [Docket No. 513]

b. *Joinder in Seacret Direct, LLC's Objection to Debtors' Motion to Approve Immaterial Modifications to the Debtors' Third Amended Chapter 11 Plan of Reorganization filed by Janie Braun, Braun Marketing Company, Matt Morris, Rhonda Morris, Dr. Troy Brown, Kathy Brown, Kari Schneider, Lisha Schneider, Byron Schrag, and Martin Ruof* [Docket No. 527]

c. *Amended Joinder in Seacret Direct, LLC's Objection to Debtors' Motion to Approve Immaterial Modifications to the Debtors' Third Amended Chapter 11 Plan of Reorganization and Objection on Separate Grounds* [Docket No. 532]

d. *Wayne Nugent, KGS Services, LLC and Nugent Holdings, LLC's Joinder and Objection to Motion to Approve Immaterial Modifications to the Debtors Third Amended Chapter 11 Plan of Reorganization* [Docket No. 572]

e. *Wayne Nugent, KGS Services, LLC and Nugent Holdings, LLC's Amended Joinder and Objection to Motion to Approve Immaterial Modifications to the Debtors' Third Amended Chapter 11 Plan of Reorganization* [Docket No. 586]

Related Document(s):

a. *Motion for Expedited Hearing on Seacret Direct, LLC's Expedited Motion to Compel Assumption or Rejection of Limited Solicitation Agreement* [Docket No. 495]

b. *Debtors' Witness List and Exhibit List* [Docket No. 480]

c. *Certificate of Service* [Docket No. 502]

Status: The hearing regarding this Motion will be going forward.

5. Pleading: *Debtors' Emergency Motion for Estimation of Certain Priority Claims Pursuant to Sections 105(a) and 502(c) of the Bankruptcy Code and 28 U.S.C. § 157* [Docket No. 523]

Moving Party: Debtors

Responses/Objections Received:

a. *Objection of Nancy Lieberman Charities to the Debtors' Emergency Motion for Estimation of Certain Priority Claims* [Docket No. 583]

b. *Objection of Melody Yiru to Debtors' Emergency Motion for Estimation of Certain Priority Claims Pursuant to Sections 105(a) and 502(c) of the Bankruptcy Code and 28 U.S.C. § 157* [Docket No. 584]

Related Document(s):

a. *Motion to Set an Expedited Hearing on the Debtors' Emergency Motion for Estimation of Certain Priority Claims Pursuant to Sections 105(a) and 502(c) of the Bankruptcy Code and 28 U.S.C. § 157* [Docket No. 524]

b. *Certificate of Service* [Docket No. 545]

c. *Witness and Exhibit List filed by the Official Committee of Unsecured Creditors* [Docket No. 554]

d. *Witness and Exhibit List filed by Verona International Holdings, Inc.'s for Combined Hearing on October 21, 2021* [Docket No. 557]

e. *Debtors' Witness and Exhibit List* [Docket No. 559]

f. *Amended Witness and Exhibit List filed by the Official Committee of Unsecured Creditors* [Docket No. 566]

Status: The hearing regarding this Motion will be going forward.

6. Pleading: *Agreed Emergency Motion for Approval of Compromise and Settlement with Montgomery Capital Advisers, LLC Pursuant to Bankruptcy Rule 9019* [Docket No. 588]

Moving Party: Debtors

Responses/Objections Received: None.

Related Document(s):

a. *Declaration of Erik Toth in Support of Debtors' Agreed Emergency Motion for Approval of Compromise and Settlement with Montgomery Capital Advisers, LLC Pursuant to Bankruptcy Rule 9019* [Docket No. 589]

b. *Motion to Set the Debtors' Agreed Emergency Motion for Approval of Compromise and Settlement with Montgomery Capital Advisers, LLC Pursuant to Bankruptcy Rule 9019 for Confirmation Hearing* [Docket No. 590]

Status: The Debtors request this Motion be heard at the confirmation hearing.

Respectfully Submitted,

Dated: October 21, 2021

/s/ Jack G. Haake

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COUNSEL FOR THE DEBTORS AND DEBTORS-IN-POSSESSION

CERTIFICATE OF SERVICE

I hereby certify that, on October 21, 2021, a true and correct copy of the foregoing document was served electronically on all parties in interest to these Cases by the Court's PACER system.

/s/ Jack G. Haake
Jack G. Haake