

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

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| IN RE: | § | |
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| DEEPROOT CAPITAL MANAGEMENT, LLC, ET AL., ¹ | § | BANKRUPTCY No. 21-51523-MMP |
| | § | LEAD CASE |
| DEBTORS. | § | JOINTLY ADMINISTERED |

TRUSTEE’S NOTICE OF EXPEDITED HEARINGS ON:
(1) TRUSTEE’S MOTION TO APPROVE
(A) SALE OF PINBALL PROPERTY, (B) SALE PROCEDURES, STALKING HORSE AGREEMENT
AND BID PROTECTIONS IN CONNECTION WITH THE SALE OF PINBALL PROPERTY
FREE AND CLEAR OF LIENS AND INTERESTS PURSUANT TO 11 USC §363(B) AND (F), AND
(C) THE FORM OF NOTICE FOR THE SALE OF PINBALL PROPERTY [ECF No. 181];
AND
(2) TRUSTEE’S RULE 9019 MOTION TO APPROVE COMPROMISE AND
SETTLEMENT WITH DRAPER 5, LLC [ECF No. 182].

PLEASE TAKE NOTICE that the Court has set expedited hearings for **November 1, 2022 at 9:30am** before the Honorable Michael M. Parker, U.S. Bankruptcy Judge, Courtroom No. 1, Third Floor, 615 E. Houston St., San Antonio, Texas 78205 on the following matters:

- *Trustee’s Motion to Approve (A) Sale of Pinball Property, (B) Sale Procedures, Stalking Horse Agreement and Bid Protections in Connection with the Sale of Pinball Property Free and Clear of Liens and Interests Pursuant to 11 U.S.C. §363(b) and (f), and (C) the Form of Notice for the Sale of Pinball Property; and (2) Trustee’s Rule 9019 Motion to Approve*

¹ The jointly administered chapter 7 cases, along with their respective case numbers and the last four digits of each Debtor’s federal tax identification number, are: In Re: Policy Services, Inc. 21-51513 (2864), In Re: Wizard Mode Media, LLC, 21-51514 (3205), In Re: deeproot Pinball LLC, 21-51515 (0320), In Re: deeproot Growth Runs Deep Fund, LLC, 21-51516 (8046), In Re: deeproot 575 Fund, LLC, 21-51517 (9404), In Re: deeproot 3 Year Bonus Income Debenture Fund, LLC, 21-51518 (7731), In Re: deeproot Bonus Growth 5 Year Debenture Fund, LLC, 21-51519 (9661), In Re: deeproot Tech LLC, 21-51520 (9043), In Re: deeproot Funds LLC, 21-51521 (9404), In Re: deeproot Studios LLC, 21-51522 (6283), and In Re: deeproot Capital Management, LLC, 21-51523 (2638), each a “**Bankruptcy Estate**” or “**Estate**” and collectively, the “**Bankruptcy Estates**” or “**Estates**”.

Compromise and Settlement with Draper 5, LLC, seeking an expedited hearing on the *Trustee’s Motion to Approve (A) Sale of Pinball Property, (B) Sale Procedures, Stalking Horse Agreement and Bid Protections in Connection with the Sale of Pinball Property Free and Clear of Liens and Interests Pursuant to 11 U.S.C. §363(b) and (f), and (C) the Form of Notice for the Sale of Pinball Property* [ECF No. 181] (the “**Sale and Procedure Motion**”); and

- *Trustee’s Rule 9019 Motion to Approve Compromise and Settlement with Draper 5, LLC* [ECF No. 182] (the “**9019 Motion**”)

IF PARTIES DO NOT WISH TO APPEAR IN PERSON, CONTACT THE COURTROOM DEPUTY, DEANNA CASTLEBERRY, BY TELEPHONE (210) 472-6720 EXT. 5735 OR BY E-MAIL AT deanna.castleberry@txwb.uscourts.gov to APPEAR VIA TELEPHONE OR WEBEX. IF YOU HAVE WITNESSES OR EXHIBITS YOU MUST APPEAR IN PERSON OR, IF GRANTED LEAVE OF COURT, BY WEBEX.

Respectfully submitted,

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**ATTORNEYS FOR JOHN PATRICK LOWE,
CHAPTER 7 TRUSTEE**

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of October, 2022, I electronically filed the foregoing document using the CM/ECF system, which will serve the document on the following list of parties in interest and parties requesting notice; a copy has also been mailed to the parties on the limited service list in this matter and a supplemental certificate of service will be filed to evidence that.

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