

HEARING DATE: October 24, 2018 at 10:00 a.m. (EST)
OBJECTION DEADLINE: October 17, 2018 at 4:00 p.m. (EST)

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: :
: Chapter 11
BICOM NY, LLC, *et al.*,¹ :
: Case No. 17-11906(MEW)
Debtors. :
: (Jointly Administrated)
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**NOTICE OF HEARING TO CONSIDER: (I) APPROVAL OF DISCLOSURE STATEMENT RELATING TO
THE FIRST AMENDED JOINT PLAN OF LIQUIDATION OF THE DEBTORS AND THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS; (II) PROCEDURES TO SOLICIT VOTES ON THE PLAN;
(III) AND RELATED RELIEF**

PLEASE TAKE NOTICE OF THE FOLLOWING:

On September 14, 2018, BICOM NY, LLC f/d/b/a Jaguar Land Rover Manhattan (“BICOM”), ISCOM NY, LLC f/d/b/a Maserati of Manhattan (“ISCOM”), and Bay Ridge Automotive Company, LLC f/d/b/a Bay Ridge Ford (“BRAC”) (collectively, as the “Debtors”), debtors and debtors-in-possession in the above Chapter 11 cases (the “Chapter 11 Cases”), and the Official Committee of Unsecured Creditors (the “Creditors’ Committee” together with the Debtors, the “Plan Proponents”) filed: (i) *The First Amended Joint Plan Of Liquidation Of The Debtors And Debtors-In-Possession And The Official Committee Of Unsecured Creditors* (the “Plan”) and the *Disclosure Statement For The First Amended Joint Plan Of Liquidation Of The Debtors And Debtors-In-Possession And The Official Committee Of Unsecured Creditors* (the “Disclosure Statement”); and (ii) the *Joint Motion For Entry Of An Order (I) Approving The Disclosure Statement, (II) Approving Solicitation Procedures, Forms Of Ballots, And Manner Of Notice, (III) Scheduling Plan Confirmation Hearing And Approving Form And Manner Of Related Notice, And (IV) Granting Related Relief* (the “Motion”).

1. Copies of the Disclosure Statement, the Plan, and the Motion are available at <http://www.jndla.com/cases/bicom>, the website of the Debtors’ balloting and claims agent, JND Corporate Restructuring (“JND”). **Creditors and other parties-in-interest receiving this notice should periodically consult JND’s website (<http://www.jndla.com/cases/bicom>) for the most current information regarding the Disclosure Statement and the Plan, including revisions, changes and/or supplements thereto.**

2. A hearing (the “Disclosure Statement Hearing”) will be held before the Honorable Michael E. Wiles, United States Bankruptcy Judge, at the United States Bankruptcy Court, One Bowling Green, Courtroom 617, New York,

¹ The last four numbers of each Debtor’s taxpayer identification number are BICOM NY, LLC (9990); ISCOM NY, LLC (1589); and Bay Ridge Automotive Company, LLC (0694).

NY 10004-1408, on **October 24, 2018 at 10:00 a.m. (prevailing Eastern Time)**, to consider the entry of an order finding, among other things, that the Disclosure Statement contains “adequate information” within the meaning of section 1125 of the Bankruptcy Code, approving the Disclosure Statement, and granting the other relief requested in the Motion related to solicitation of voting on the Plan. The Disclosure Statement Hearing may be continued from time to time without further notice other than the announcement of the adjourned date(s) at the Disclosure Statement Hearing or any continued hearing.

3. Responses or objections, if any, to approval of the proposed Disclosure Statement, or the other relief sought by the Debtors in the Motion must: (i) be in writing; (ii) conform to the Bankruptcy Rules and the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the Southern District of New York; (iii) state the name and address of the objecting party and the amount and nature of the Claim of such party; (iv) state with particularity the basis of any objection or response and include, where appropriate, proposed language to be inserted in the Disclosure Statement to resolve any such objection or response; and (v) be filed, together with proof of service, with the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Courtroom 617, New York, NY 10004-1408 and served so as to be actually received prior to **October 17, 2018 at 4:00 p.m. (prevailing Eastern Time)** by counsel for: (i) the Debtors, WILK AUSLANDER LLP, 1515 Broadway, 43rd Floor, New York, New York 10036 (Attn: Eric J. Snyder and Eloy A. Peral); (ii) the Creditors’ Committee, MOSES & SINGER LLP, 405 Lexington Avenue, New York, New York 10174 (Attn: Alan E. Gamza and Jessica K. Bonteque); and (b) William K. Harrington, United States Trustee for Region 2, 201 Varick Street, Suite 1006, New York, NY 10014 (Attn: Richard C. Morrissey, Esquire).

4. Upon approval of the Disclosure Statement by the Bankruptcy Court, you will receive a copy of the Disclosure Statement, the Plan and various documents related thereto, unless otherwise ordered by the Bankruptcy Court.

5. THIS NOTICE IS NOT A SOLICITATION OF VOTES TO ACCEPT OR REJECT THE PLAN. VOTES ON THE PLAN MAY NOT BE SOLICITED UNTIL THE DISCLOSURE STATEMENT IS APPROVED BY AN ORDER OF THE BANKRUPTCY COURT.

Dated: New York, New York
September 14, 2018

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-and-

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