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10
 11 **UNITED STATES BANKRUPTCY COURT**
 12 **DISTRICT OF NEVADA**

13 In re 14 CASH CLOUD, INC., dba COIN CLOUD, 15 16 Debtor.	Case No. BK-23-10423-mkn Chapter 11 NOTICE OF COMBINED HEARING RE: (I) FINAL APPROVAL OF DISCLOSURE STATEMENT; AND (II) CONFIRMATION OF CHAPTER 11 PLAN OF REORGANIZATION DATED MAY 8, 2023 Hearing Date: June 28, 2023 Hearing Time: 10:30 a.m.
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 22 **PLEASE TAKE NOTICE** that on May 8, 2023, Cash Cloud, Inc. dba Coin Cloud
 23 (“Debtor”), debtor and debtor in possession in the above-captioned case (the “Chapter 11 Case”),
 24 filed an *Ex Parte Motion for Order Pursuant to 11 U.S.C. 105(d)(2)(B)(VI), Fed. R. Bankr. P. 3017.1*
 25 *and Local Rule 3017 Implementing Expedited Solicitation and Confirmation Procedures Including:*
 26 *(I) Conditionally Approving Disclosure Statement; (II) Setting Combined Hearing on Final Approval*
 27 *of Disclosure Statement and Plan Confirmation; (III) Approving (A) Form and Scope of Combined*
 28 *Hearing Notice, and (B) Form of Ballots; (IV) Scheduling Voting and Objection Deadlines; and*

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1 (V) *Granting Related Relief* [Docket No. 530] (the “Motion”),¹ seeking, among other things,
2 conditional approval of the adequacy of Debtor’s *Disclosure Statement in Connection with Debtor’s*
3 *Chapter 11 Plan of Reorganization Dated May 8, 2023* [Docket No. 529] (the “Disclosure
4 Statement”).

5 **PLEASE TAKE FURTHER NOTICE** that on May 12, 2023, the United States Bankruptcy
6 Court for the District of Nevada (the “Bankruptcy Court”) entered an *Order* granting the Motion
7 [Docket No. 554] (the “Solicitation Order”) which, among other things, conditionally approved the
8 Disclosure Statement and directed the Debtor to solicit votes with regard to the approval or rejection
9 of the *Debtor’s Chapter 11 Plan of Reorganization Dated May 8, 2023* [Docket No. 528] (the “Plan”).

10 **PLEASE TAKE FURTHER NOTICE** that a combined hearing to consider the final
11 approval of the Disclosure Statement, as well as confirmation of the Plan (the “Combined Hearing”)
12 will commence at **10:30 a.m. prevailing Pacific Time on June 28, 2023**, before the Honorable Mike
13 K. Nakagawa, United States Bankruptcy Judge, the Foley Federal Building, 300 Las Vegas Boulevard
14 South, Courtroom No. 2, Las Vegas, Nevada. The Combined Hearing may be continued from time
15 to time by announcing such continuance in open court or otherwise, without further notice to parties
16 in interest. The Bankruptcy Court, in its discretion, may impose certain procedural rules governing
17 the Combined Hearing.

18 **NOTICE IS FURTHER GIVEN** that the hearing will be held remotely. Parties are
19 permitted to appear telephonically by dialing (669) 254-5252 and entering meeting ID 161 062 2560
20 and entering access code or passcode 029066#.

28 ¹ Capitalized terms not defined herein shall the meanings assigned to them in the Motion.

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1 **NOTICE IS FURTHER GIVEN** that if you do not want the court to grant the relief sought,
2 or if you want the court to consider your views on the Plan and Disclosure Statement, then you must
3 file an opposition with the Bankruptcy Court, and serve a copy as instructed below.

4 If you object to the relief requested, you *must* file a **WRITTEN** response to this pleading
5 with the court. You *must* also serve your written response on the person who sent you this notice.

6 If you do not file a written response with the court, or if you do not serve your written
7 response on the person who sent you this notice, then:

- 8 • The court may *refuse to allow you to speak* at the scheduled hearing; and
- 9 • The court may *rule against you* without formally calling the matter at the hearing.

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11 **PLEASE TAKE FURTHER NOTICE** that the deadline to file and serve objections to the
12 final approval of the Disclosure Statement and confirmation of the Plan is **June 12, 2023 at 5:00 p.m.**
13 **(Pacific Time)** (the “Objection Deadline”). Creditors and parties in interest may object to the
14 conditionally approved Disclosure Statement as permitted by Bankruptcy Rule 3017.1 and Local
15 Rule 3017. Any objection to the Disclosure Statement and/or to the Plan must:

- 16 (i) be in writing;
- 17 (ii) conform to the Bankruptcy Rules and the Local Rules;
- 18 (iii) set forth the name of the objector, the nature and amount of claims or interests
19 held or asserted by the objector against the Debtor’s estate or property, the
20 basis for the objection and the specific grounds therefor, set forth all relevant
21 facts and legal authority, and be supported by affidavits or declarations that
22 conform to Local Rule 9014(c);
- 23 (iv) be served via electronic mail, personal service or overnight delivery upon:
24 (a) counsel to Debtor, Fox Rothschild LLP, 1980 Festival Plaza Drive, Suite
25 700, Las Vegas, Nevada 89135, Attn: Brett Axelrod; (b) counsel to DIP
26 Lender, (i) Berger Singerman LLP, 1450 Brickell Avenue, Suite 1900, Miami,
27 FL 33131, Attn: Jordi Guso, and (ii) Sylvester & Polednak Ltd., 1731 Village
28 Center Circle, Las Vegas, NV 89134, Attn: Jeffrey R. Sylvester; (c) counsel to

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1 Genesis Global Holdco, LLC, Cleary Gottlieb Steen & Hamilton LLP, One
2 Liberty Plaza, New York, NY 10006, Attn: Sean A. O’Neal and Jane VanLare;
3 (d) counsel to Enigma Securities Limited, (i) Morrison & Foerster LLP, 250
4 West 55th Street, New York, NY 10019, Attn: Gary S. Lee and Andrew
5 Kissner, and (ii) Shea Larsen, 1731 Village Center Circle, Suite 150, Las
6 Vegas, NV 89134, Attn: James Patrick Shea; (e) counsel to the Committee of
7 Unsecured Creditors (the “Committee”), (i) Seward & Kissel LLP, One Battery
8 Park Plaza, New York, New York 10004, Attn: John R. Ashmead and Robert
9 J. Gayda, and (ii) McDonald Carano Wilson LLP, 2300 W. Sahara Ave., Suite
10 1200, Las Vegas, NV 89102 Attn: Ryan J. Works, and (f) the Office of the
11 United States Trustee, 300 Las Vegas Boulevard S., Suite 4300, Las Vegas,
12 NV 89101, Attn: Jared A. Day; and

13 (v) be filed with the Clerk of the United States Bankruptcy Court for the District
14 of Nevada,

15 in each case so as to be received no later than 5:00 p.m. (Pacific Time) on the Objection
16 Deadline.

17 Any party-in-interest who fails to (a) object to the approval of the Disclosure Statement,
18 and/or confirmation of the Plan in writing, (b) timely file such objection in compliance with the Local
19 Rules, and (c) timely serve such objection as set forth above, shall be deemed to have waived any
20 objection to the approval of the Disclosure Statement and/or the confirmation of the Plan.

21 **PLEASE TAKE FURTHER NOTICE** that pursuant to the Solicitation Order, the
22 Bankruptcy Court approved the Solicitation Procedures attached as Exhibit “A” to the Solicitation
23 Order. The Solicitation Procedures govern various important aspects of the means by which the
24 Debtor will solicit votes on and seek confirmation of the Plan.

25 **PLEASE TAKE FURTHER NOTICE** that copies of the Plan, the Disclosure Statement, the
26 Solicitation Order and other documents are available: (a) electronically through the Court’s CM/ECF
27 system at <http://ecf.nvb.uscourts.gov> (PACER account required); (b) electronically on the following
28 website: <https://cases.stretto.com/CashCloud>; or (c) by contacting Debtor’s counsel, Fox Rothschild,

1 LLP, 1980 Festival Plaza Drive, Suite 700, Las Vegas, Nevada 89135; telephone: (702) 262-6899;
2 Attn: Patricia Chlum, Paralegal, email: pchlum@foxrothschild.com.

3 Dated this 12th day of May, 2023.

4 **FOX ROTHSCHILD LLP**

5 By /s/Brett A. Axelrod
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