

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS**

In re:

SAKS GLOBAL ENTERPRISES LLC, *et al.*,¹

Debtors.

)
) Chapter 11
)

) Case No. 26-90103 (ARP)
)

) (Jointly Administered)
)

) (Emergency Relief Requested)

**AMAZON’S EMERGENCY MOTION FOR ADJOURNMENT OF THE
GLOBAL DEBTORS’ DIP MOTION AND CASH MANAGEMENT MOTION**

Emergency relief has been requested. Relief is requested not later than 2:00 p.m. (prevailing Central Time) on January 14, 2026.

If you object to the relief requested or you believe that emergency consideration is not warranted, you must appear at the hearing, if one is set, or file a written response prior to the date that relief is requested in the preceding paragraph. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

Amazon.com Services LLC and its affiliates (collectively, “*Amazon*”) respectfully request the Court adjourn the “first day” hearing currently scheduled for 4:00 p.m. (CT) today, January 14, 2026, with respect to the Global Debtors’ DIP financing [Docket No. 49] and cash management relief [Docket No. 13]:

1. As set forth in the DIP motion, the Global Debtors seek approval of three separate DIP facilities that includes:

- (i) an ABL DIP facility that would provide \$1.5 billion of availability under a new DIP ABL facility (*an increase in \$240 million of availability, all approved upon entry of the interim DIP*) with a “creeping” rollup of amounts loaned in the interim

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://cases.stretto.com/Saks>. The location of Debtor Saks Global Enterprises LLC’s corporate headquarters and the Debtors’ service address in these chapter 11 cases is 225 Liberty Street, 31st Floor, New York, NY 10281. Bradley Arant Boult Cummings LLP is proposed counsel for the following Debtors: Saks OFF 5TH Holdings LLC, Saks OFF 5TH LLC, Saks OFF 5TH Midco Partner Inc., and Luxury Outlets USA, LLC (collectively, the “*SO5 Digital Debtors*”). Haynes and Boone, LLP and Willkie Farr & Gallagher LLP are proposed counsel for the remaining Debtors (collectively, the “*Global Debtors*”).

period plus \$56 million in letters of credit (*all approved upon entry of the interim DIP order*);

- (ii) an approximately \$2.5 billion DIP facility that would include \$1.0 billion of new-money DIP term loan commitments (*with \$400 million to be approved upon entry of the interim DIP order*), a rollup of approximately \$808 million of prepetition notes (*\$359 million to be approved upon entry of the interim DIP order*), and an additional \$751 million to effectively roll up other prepetition notes (*all \$751 million to be approved on an interim basis*); and
- (iii) an approximately \$1.75 billion intercompany DIP facility consisting of \$1 billion in new-money financing (*\$400 million to be approved on an interim basis*) and approximately \$750 million in rolled up prepetition loans (*all \$750 million to be approved on an interim basis*).

2. Amazon intends to object to such interim and final relief. The Global Debtors filed the DIP motion, proposed DIP order, and DIP declarations (but no DIP credit agreements, which have still not been filed) at approximately 10:30 a.m. (CT)—just 5.5 hours before the hearing scheduled at 4:00 p.m. (CT). *First*, that kind of notice is insufficient and not consistent with due process. Amazon (and all other parties in interest) deserves more than 5.5 hours to evaluate the requested relief (which includes three complicated DIP facilities and interim rollups), which will significantly affect their rights, so that the Court can consider the requested relief in a full and fair manner. *Second*, any emergency hearing today is unnecessary as even if the DIP is approved, the DIP lenders will not be able to fund the DIP today anyway given the time of day.

3. Amazon thus requests that any hearing on such interim relief be adjourned at least 24 hours. Amazon will submit its objection no later than two hours before the rescheduled hearing. Amazon requested such adjournment from the Debtors, and the Debtors declined without any explanation.

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Respectfully submitted,

Date: January 14, 2026

/s/ Caroline A. Reckler

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served by electronic mail via the Court's ECF system to all parties authorized to receive electronic notice in this case on January 14, 2026.

/s/ Caroline A. Reckler
Caroline A. Reckler