

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:

Chapter 11

ALOUETTE HOLDINGS, INC.,

Case No. 19-36126-KRH

Debtor.

NOTICE OF MOTION AND NOTICE OF HEARING

PLEASE TAKE NOTICE that on November 21, 2019, the above-captioned debtor and debtor in possession (the “Debtor”) filed the following with the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division (the “Court”):

(i) *Debtor’s Motion for Entry of Interim and Final Orders Authorizing the Debtor to Obtain Post-Petition Financing* (Docket No. 4)

(ii) *Debtor’s Motion for Expedited Hearing on Debtor’s Motion for Entry of Interim and Final Orders Authorizing the Debtor to Obtain Post-Petition Financing* (Docket No. 5)

PLEASE TAKE FURTHER NOTICE that the above-referenced motions have been scheduled for hearing on **November 22, 2019 at 11:00 a.m. prevailing Eastern Time, Courtroom 5000, United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division, 701 East Broad Street, Richmond, Virginia 23219.**

PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read the above-referenced motions carefully and discuss them with your attorney, if you have one in this chapter 11 case. (If you do not have an attorney, you may wish to consult one).

PLEASE TAKE FURTHER NOTICE that if you do not want the Court to grant the relief requested in the above-referenced motions, or if you want the Court to consider your views on the motions, then you or your attorney must attend the hearing. If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motions and may enter orders granting the relief requested.

Michael E. Hastings (Virginia Bar No. 36090)
Brandy M. Rapp (Virginia Bar No. 71385)
WHITEFORD, TAYLOR & PRESTON LLP
Two James Center
1021 E. Cary St., Suite 1700
Richmond, Virginia 23219
T: (804) 799-7859
F: (804) 977-3295
mhastings@wtplaw.com
brapp@wtplaw.com

*Proposed Counsel for the Debtor and
Debtor in Possession*

Dated: November 21, 2019

ALOUETTE HOLDINGS, INC.

/s/ Michael E. Hastings

Michael E. Hastings (Virginia Bar No. 36090)
Brandy M. Rapp (Virginia Bar No. 71385)
WHITEFORD, TAYLOR & PRESTON LLP
Two James Center
1021 E. Cary St., Suite 1700
Richmond, Virginia 23219
T: (804) 799-7859
F: (804) 977-3295
mhastings@wtplaw.com
brapp@wtplaw.com

*Proposed Counsel for the Debtor and
Debtor in Possession*

CERTIFICATE OF SERVICE

I hereby certify that on November 21, 2019, I caused a copy of the foregoing *Notice of Motion and Notice of Hearing* to be served via first-class mail, postage prepaid and electronically via e-mail, as noted on the following parties:

Office of the United States Trustee for the Eastern District of Virginia 701 E. Broad St., Suite 4304 Richmond, VA 23219	Office of the United States Attorney for the Eastern District of Virginia 919 E. Main St., Suite 1900 Richmond, VA 23219
Internal Revenue Service Centralized Insolvency Operation P. O. Box 7346 Philadelphia, PA 19101-7346	United States Treasury Department of Treasury P.O. Box 804522 Cincinnati, OH 45280-4522
John H. Small, Esq. Brooks Pierce P.O. Box 26000 Greensboro, NC 27420 jsmall@brookspierce.com William E. Callahan, Jr., Esq. Gentry Locke P.O. Box 40013 Roanoke, VA 24022-0013 callahan@gentrylocke.com <i>Counsel for the Lender</i>	NewTek Small Business Finance, LLC Attn: Gary Golden 1981 Marcus Ave., Suite 130 New Hyde Park, NY 11042 ggolden@newtekbusinessservices.com
Benson Howard 4512 Tweedsmuir Turn Moseley, VA 23120 benson@ameliapt.com	PIRs Capital LLC Attn: Eric Mallinger 40 Exchange Place New York, NY 10005 eric.mallinger@pirscapital.com
Michael A. Condyles, Esq. Kutak Rock 901 E. Byrd St., Suite 1000 Richmond, VA 23219-4071 michael.condyles@kutakrock.com <i>Counsel for NewTek Small Business Finance, LLC</i>	Bret and Dorathy Berneche 307 Palamino Road Buffalo Junction, VA 24529
Burnette & Sneed CPAs LLC P.O. Box 680 South Boston, VA 24592	Capital One Attn: General Correspondence P.O. Box 30285 Salt Lake City, UT 84130-0285
Cardinal Homes, Inc. 525 Barnsville Highway	Charlotte County Treasurer P.O. Box 267

Wylliesburg, VA 23976	Charlotte Court House, VA 23923
Citibank Customer Service P.O. Box 6500 Sioux Falls, SD 57117	Kituwah, LLC 1158 Seven Clans Lane Cherokee, NC 28719
Paymentus Louis L. Redding Building 800 N. French Street Wilmington, DE 19801	Raffles Insurance Ltd Kensington House, Dr Roys Drive George Town P.O. Box 10027 Grand Cayman KY1-1001 KY
Virginia State Corporation Commission 1300 E. Main Street Richmond, VA 23219	Wells Fargo Bank P.O. Box 6995 Portland, OR 97228-6995
Wells Fargo Card Services P.O. Box 51193 Los Angeles, CA 90051-5493	

/s/ Michael E. Hastings