

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

	x	Chapter 11
	:	
In re:	:	Case No. 01-0706 (MFW)
	:	
ETOYS, INC. <i>et. al.</i> ,	:	Jointly Administered
	:	
Debtors.	:	<b>Hearing Date: March 11, 2014 at 2:00 p.m. ET</b>
	:	<b>Obj. Deadline: February 28, 2014 at 4:00 p.m.</b>
	x	<b>ET</b>

**NOTICE OF MOTION OF BARRY GOLD AS PLAN ADMINISTRATOR OF THE  
SUBSTANTIVELY CONSOLIDATED POST-CONFIRMATION ESTATE OF  
EBC I, INC. F/K/A ETOYS, INC., AND AFFILIATED DEBTORS, FOR (I) A  
FINAL DECREE AND ORDER CLOSING THE REMAINING CHAPTER 11  
CASE, AND (II) AN ORDER (A) APPROVING PROCEDURES RELATING TO  
FINAL DISTRIBUTIONS, (B) AUTHORIZING PLAN ADMINISTRATOR TO  
ABANDON OR DESTROY CERTAIN BOOKS, RECORDS AND FILES, (C)  
TERMINATING THE SERVICES OF THE CLAIMS AND NOTICING  
AGENT APPOINTED IN THE CHAPTER 11 CASES, AND  
(D) GRANTING RELATED RELIEF**

**TO: All Parties Identified on the Attached Service List.**

PLEASE TAKE NOTICE that Barry Gold, as Plan Administrator for the substantively consolidated post-confirmation estate (the "Post-Confirmation Estate") of EBC I, Inc., f/k/a eToys, Inc., have today filed the attached **Motion of Barry Gold as Plan Administrator of the Substantively Consolidated Post-Confirmation Estate of EBC I, Inc. f/k/a eToys, Inc., and Affiliated Debtors, for (I) a Final Decree and Order Closing the Remaining Chapter 11 Case, and (II) an Order (A) Approving Procedures Relating to Final Distributions, (B) Authorizing Plan Administrator to Abandon or Destroy Certain Books, Records and Files, (C) Terminating the Services of the Claims and Noticing Agent Appointed in the Chapter 11 Cases, and (D) Granting Related Relief** (the "Motion").

PLEASE TAKE FURTHER NOTICE that any party wishing to oppose the entry of an order approving the Motion must file a response or objection ("Objection") if any, to the Motion with the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801 on or before the objection deadline of **February 28, 2014 at 4:00 p.m. (Eastern Time)** (the "Objection Deadline").

At the same time, you must serve such Objection on counsel for the Movants so as to be received by the Objection Deadline.

PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE MOTION WILL BE HELD **MARCH 11, 2014 AT 2:00 P.M. (ET)** BEFORE THE HONORABLE MARY F. WALRATH, UNITED STATES BANKRUPTCY JUDGE, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 6TH FLOOR, WILMINGTON, DELAWARE 19801.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: February 7, 2014  
Wilmington, Delaware

MORRIS NICHOLS ARSHT & TUNNELL LLP

/s/ Gregory W. Werkheiser

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