

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

In re:

AN GLOBAL, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 23-11294 (JKS)

(Jointly Administered)

Hearing Date: October 4, 2023 at 2:00 p.m. (ET)

Objection Deadline: September 14, 2023 at 4:00 p.m. (ET)

**OMNIBUS NOTICE OF SECOND DAY HEARING
TO BE HELD ON OCTOBER 4, 2023 AT 2:00 P.M. (ET)**

PLEASE TAKE NOTICE that, on August 28, 2023 (the “Petition Date”), the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed voluntary petitions (the “Petitions”) for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”).

PLEASE TAKE FURTHER NOTICE that, the following motions (collectively, the “First Day Motions”) were approved on an interim basis [Docket Nos. 48, 56, 57, 61, 62, 63 and 69] and will be heard on a final basis at a hearing scheduled for **October 4, 2023 at 2:00 p.m. (ET)** (the “Second Day Hearing”) before the Honorable J. Kate Stickles, Bankruptcy Judge, at the

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number or registration number in the applicable jurisdiction, are: AN Global LLC (5504); AgileThought, Inc. (2509); 4th Source Holding Corp. (9629); 4th Source Mexico, LLC (7552); 4th Source, LLC (7626); AgileThought Brasil-Consultoria, Em Tecnologia LTDA (01-42); AgileThought Brasil Servicos de Consultoria Em Software (01-20); AgileThought Costa Rica S.A. (6822); AgileThought Digital Solutions, S.A.P.I. de C.V. (3KR0); AgileThought México S.A. de C.V. (7E46); AgileThought, LLC (7076); AgileThought Servicios Administrativos, S.A. de C.V. (4AG1); AgileThought Servicios México S.A. de C.V. (8MY5); AgileThought, S.A.P.I. de C.V. (No Tax ID); AGS Alpama Global Services USA, LLC (0487); AN Data Intelligence, S.A. de C.V. (8I73); AN Extend, S.A. de C.V. (1D80); AN Evolution, S. de R.L. de C.V. (7973); AN USA (5502); AN UX, S.A. de C.V. (7A42); Cuarto Origen, S. de R.L. de C.V. (0IQ9); Entrepids México, S.A. de C.V. (OCYA); Entrepids Technology Inc. (No Tax ID); Facultas Analytics, S.A.P.I. de C.V. (6G37); Faktos Inc., S.A.P.I. de C.V. (3LLA); IT Global Holding LLC (8776); and QMX Investment Holdings USA, Inc. (9707). The Debtors’ headquarters are located at 222 W. Las Colinas Boulevard, Suite 1650E, Irving, Texas 75039.



Bankruptcy Court, 824 North Market Street, 5th Floor, Courtroom No. 6, Wilmington, Delaware
19801 (the “Court”):

1. **Utilities:** Debtors’ Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105(a) and 366 (I) Prohibiting Utilities from Altering, Refusing, or Discontinuing Services on Account of Prepetition Invoices, (II) Deeming Utilities Adequately Assured of Future Performance, and (III) Establishing Procedures for Determining Adequate Assurance of Payment [[Docket No. 4](#) - filed August 28, 2023]
2. **Tax:** Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Taxes in the Ordinary Course of Business and (II) Authorizing Banks and Financial Institutions to Honor and Process Checks and Transfers Related Thereto [[Docket No. 5](#) - filed August 28, 2023]
3. **Wage:** Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay (I) Prepetition Employee Obligations, (II) Prepetition Withholding Obligations, and (III) Postpetition Employee Obligations in the Ordinary Course, and (B) Authorizing Banks to Honor Related Transfers [[Docket No. 6](#) - filed August 28, 2023]
4. **Critical Vendor:** Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Prepetition Claims of (A) Domestic Critical Vendors, (B) Lienholders, and (C) Foreign Vendors; (II) Authorizing Banks to Honor and Process Related Checks and Electronic Transfers; and (III) Granting Related Relief [[Docket No. 7](#) - filed August 28, 2023]
5. **Insurance:** Debtors’ Motion for an Order (I) Authorizing the Debtors to (A) Continue Their Insurance Programs and (B) Pay Certain Obligations in Respect Thereof, and (II) Authorizing the Debtors’ Financial Institutions to Honor and Process Checks and Transfers Related to Such Obligations [[Docket No. 8](#) - filed August 28, 2023]
6. **Cash Management:** Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Continue to Maintain Their Existing Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, and (C) Continue to Perform Ordinary Course Intercompany Transactions; (II) Granting Administrative Expense Status to Ordinary Course Postpetition Intercompany Claims; and (III) Granting Related Relief [[Docket No. 9](#) - filed August 28, 2023]
7. **NOL:** Debtors’ Motion Pursuant to 11 U.S.C. §§ 362 & 105(A) For Entry of Interim and Final Orders Establishing Notification and Hearing Procedures and Approving Restrictions on Certain Transfers of Interests in the Debtors’ Estates [[Docket No. 11](#) - filed August 28, 2023]

PLEASE TAKE FURTHER NOTICE that objections, if any, to the First Day Motions must comply with the Federal Rules of Bankruptcy Procedure and the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware. Objections, if any, to the First Day Motions must be filed with the Court and served upon each of the parties set forth below on or before **September 14, 2023 at 4:00 p.m. (ET)**: (i) proposed counsel to the Debtors, (a) Hughes Hubbard & Reed LLP, One Battery Park Plaza New York, NY 10004-1482 (Attn: Kathryn A. Coleman (katie.coleman@hugheshubbard.com), Christopher Gartman (chris.gartman@hugheshubbard.com), Jeffrey S. Margolin (jeff.margolin@hugheshubbard.com) and Elizabeth A. Beitler (elizabeth.beitler@hugheshubbard.com)), and (b) Potter Anderson & Corroon LLP, 1313 North Market Street, 6th Floor, Wilmington, Delaware 19801 (Attn: Jeremy W. Ryan (jryan@potteranderson.com), R. Stephen McNeill (rmcneill@potteranderson.com and Gregory J. Flasser (gflasser@potteranderson.com)); (ii) Office of the United States Trustee, J. Caleb Boggs Federal Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801 (Attn: Benjamin Hackman (benjamin.a.hackman@usdoj.gov)); (iii) counsel to the DIP Agent, Ropes & Gray LLP, 1211 Avenue of the Americas, New York, NY 10036-8704, (Attn: Gregg Galardi, Esq. (gregg.galardi@ropesgray.com), Leonard Klingbaum, Esq. (Leonard.Klingbaum@ropesgray.com) and Lindsay Barca, Esq. (lindsay.barca@ropesgray.com)) and Chipman Brown Cicero & Cole, LLP, 1313 N. Market Street Suite 5400, Wilmington, DE 19801 (Attn: Mark L. Desgrosseilliers (desgross@chipmanbrown.com)), and (iv) if any statutory committee has been appointed in these Chapter 11 Cases, counsel to such committee (collectively, the “Notice Parties”).

PLEASE TAKE FURTHER NOTICE that copies of the First Day Motions and the interim orders entered with respect to the First Day Motions, which are served herewith, can be obtained through the Court's website at <https://ecf.deb.uscourts.gov>, referencing Case No. 23-11294 (JKS), and on the website of the Debtors' notice and claims agent, Kurtzman Carson Consultants LLC at [https:// https://www.kccllc.net/agilethought](https://www.kccllc.net/agilethought).

PLEASE TAKE FURTHER NOTICE that the Second Day Hearing may be continued or adjourned thereafter from time to time without further notice other than an announcement of the adjourned date or dates at the Second Day Hearing or at a later hearing. The Debtors will file an agenda before the Second Day Hearing, which may modify or supplement the motions and applications to be heard at the Second Day Hearing.

PLEASE TAKE FURTHER NOTICE that you need not appear at the Second Day Hearing if you do not object to the relief requested in the First Day Motions.

PLEASE TAKE FURTHER NOTICE THAT IF YOU DO NOT WANT THE COURT TO GRANT THE RELIEF REQUESTED IN THE FIRST DAY MOTIONS, OR IF YOU WANT THE COURT TO CONSIDER YOUR VIEW ON THE FIRST DAY MOTIONS, THEN YOU OR YOUR ATTORNEY MUST TIMELY FILE AND SERVE AN OBJECTION AND ATTEND THE SECOND DAY 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 FIRST DAY MOTIONS AND MAY ENTER ORDERS GRANTING THE RELIEF REQUESTED IN THE FIRST DAY MOTIONS.

Dated: August 31, 2023
Wilmington, Delaware

Respectfully submitted,

/s/ Gregory J. Flasser

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