## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:	) Chapter 11	
ANAGRAM HOLDINGS, LLC, et al.,1	) Case No. 23-90901 (MI)	
Debtors.	) (Joint Administration Requested) _ ) (Emergency Hearing Requested)	
NOTICE OF DESIGNATION AS COMPLEX CHAPTER 11 BANKRUPTCY CASE		
On November 8, 2023 (the "Petition	n Date"), Anagram Holdings, LLC and its debtor	
subsidiaries, as debtors and debtors in possession (collectively, the "Debtors") in the above-		
captioned chapter 11 cases (the "Chapter 11 Cases") filed voluntary petitions for relief under		
title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court		
for the Southern District of Texas (the "Court").	The undersigned proposed counsel believes that	
these chapter 11 cases qualify as complex chapter 11 cases because:		

The Debtors have total debt of more than \$10 million;

There are more than 50 parties in interest in this case;

Claims against the Debtors are publicly traded; and/or

X

X

Other (Substantial explanation is required. Attach additional sheets if necessary.)

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Anagram Holdings, LLC (8535); Anagram International, Inc. (2523) and Anagram International Holdings, Inc. (5837). The location of the Debtors' service address for purposes of these chapter 11 cases is: 7700 Anagram Drive, Eden Prairie, MN 55344. For the avoidance of doubt, the Debtors' chapter 11 cases are not proposed to be consolidated with the Party City (as defined herein) debtors which emerged from chapter 11 cases in this Court on October 12, 2023. *See In re Party City Holdco Inc.*, et. al., Case No. 23-90005 (MI) (Bankr. S.D. Tex). Any reference herein to the Debtors does not include the debtor-entities that were administered in the Party City chapter 11 cases.

WHEREFORE, the Debtors respectfully request that the Court enter an order granting the relief requested herein and granting such other and further relief as the Court deems appropriate under the circumstances.

Dated: November 8, 2023

Houston, Texas

Respectfully submitted,

By: /s/ Tom A. Howley

### HOWLEY LAW PLLC

Tom A. Howley (Texas Bar No. 24010115) Eric Terry (Texas Bar No. 00794729) Pennzoil Place – South Tower 711 Louisiana St., Suite 1850 Houston, Texas 77002

Telephone: 713-333-9125

Email: tom@howley-law.com

eric@howley-law.com

- and -

### SIMPSON THACHER & BARTLETT LLP

Sunny Singh (*pro hac vice* pending) Nicholas E. Baker (*pro hac vice* pending) Moshe A. Fink (*pro hac vice* pending) Ashley M. Gherlone (*pro hac vice* pending) 425 Lexington Avenue New York, NY 10017

Tel: (212) 455-2000 Fax: (212) 455-2502

Email: Sunny.Singh@stblaw.com

NBaker@stblaw.com Moshe.Fink@stblaw.com Ashley.Gherlone@stblaw.com

Proposed Counsel to the Debtors and the Debtors in Possession

## **Certificate of Accuracy**

I certify that the facts and circumstances described in the above pleading giving rise to the emergency request for relief are true and correct to the best of my knowledge, information, and belief. This statement is made pursuant to Bankruptcy Local Rule 9013-1(i).

/s/ Tom A. Howley
Tom A. Howley

## **Certificate of Service**

I certify that on November 8, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Tom A. Howley
Tom A. Howley

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

	)
In re:	) Chapter 11
	)
ANAGRAM HOLDINGS, LLC, et al., <sup>1</sup>	) Case No. 23-90901 (MI
	)
Debtors.	) (Jointly Administered)
	)

### ORDER GRANTING COMPLEX CHAPTER 11 BANKRUPTCY CASE TREATMENT

These jointly administered cases were filed on November 8, 2023. A *Notice of Designation* as Complex Chapter 11 Bankruptcy Case was filed. Based on its review of the initial pleadings, the United States Bankruptcy Court for the Southern District of Texas (the "Court") concludes that the complex case designation is appropriate. Accordingly, the Court orders:

- 1. The Procedures for Complex Cases in the Southern District of Texas apply to these cases. The procedures are posted on the Court's website. Compliance with the procedures is required.
- 2. The Debtors must give notice of this Order to all parties in interest within seven days. If a party in interest objects to the provisions of this Order, that party may file an appropriate motion within 14 days after service of the Order.
- 3. The Bankruptcy Local Rules of the Southern District of Texas (the "Bankruptcy Local Rules") apply to this case, subject to the following modifications:

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Anagram Holdings, LLC (8535); Anagram International, Inc. (2523) and Anagram International Holdings, Inc. (5837). The location of the Debtors' service address for purposes of these chapter 11 cases is: 7700 Anagram Drive, Eden Prairie, MN 55344. For the avoidance of doubt, the Debtors' chapter 11 cases are not proposed to be consolidated with the Party City debtors which emerged from chapter 11 cases in this Court on October 12, 2023. See In re Party City Holdco Inc., et. al., Case No. 23-90005 (MI). Any reference herein to the Debtors does not include the debtor-entities that were administered in the Party City chapter 11 cases.

- i. Bankruptcy Local Rule 1001-1(b) does not apply.
- ii. Local District Court Civil Rule 83.1 applies.
- iii. Appendix A to the Bankruptcy Local Rules of the District Court applies.
- iv. If a conflict exists between the Bankruptcy Local Rules and the Procedures for Complex Cases in the Southern District of Texas, the Procedures for Complex Cases in the Southern District of Texas govern.

Dated:	
	UNITED STATES BANKRUPTCY HIDGE