

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:) Chapter 11
)
GULF PACKAGING, INC.,¹) Case No. 15-15249
)
Debtor.) Hon. Pamela S. Hollis
)
) Hearing Date: May 19, 2015 at 10:30 a.m.
)

NOTICE OF MOTION

PLEASE TAKE NOTICE that on May 19, 2015 at 10:30 a.m., the undersigned shall appear before the Honorable Pamela S. Hollis in Courtroom 644, or whomever may be sitting in her place and stead, at the United States Bankruptcy Court for the Northern District of Illinois, Eastern Division, 219 S. Dearborn Street, Chicago, Illinois and will then and there present the attached *Motion to Extend Deadline for Committee to Object to: (I) Motion to Approve Cash Management System and Related Relief; (II) Motion to Use Cash Collateral; and (III) Motion to Pay Wages, Salaries, and Other Compensation*, a copy of which are attached hereto and herewith served upon you.

Dated: May 15, 2015

**OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF GULF PACKAGING, INC.**

By: /s/ Shelly A. DeRousse
One of Its Proposed Attorneys

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¹ The last four digits of the Debtor's tax identification number are 5030.

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CERTIFICATE OF SERVICE

I, Shelly A. DeRousse, an attorney, hereby certify that on May 15, 2015, I caused a true and correct copy of the foregoing *Notice of Motion* and *Motion to Extend Deadline for Committee to Object to: (I) Motion to Approve Cash Management System and Related Relief; (II) Motion to Use Cash Collateral; and (III) Motion to Pay Wages, Salaries, and Other Compensation* to be filed electronically with the Court and served upon the following parties by the manner listed.

/s/ Shelly A. DeRousse

CM/ECF Notice

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**MOTION TO EXTEND DEADLINE FOR COMMITTEE TO OBJECT TO:
(I) MOTION TO APPROVE CASH MANAGEMENT SYSTEM AND RELATED
RELIEF; (II) MOTION TO USE CASH COLLATERAL; AND
(III) MOTION TO PAY WAGES, SALARIES AND OTHER COMPENSATION**

The Official Committee of Unsecured Creditors (the “Committee”) of Gulf Packaging, Inc. (the “Debtor”), by and through its undersigned proposed counsel, hereby moves (the “Motion”) this Court for entry of an order extending the deadline (the “Objection Deadline”) through and including May 22, 2015 for the Committee to object to several motions filed by the Debtor. In support hereof, the Committee states as follows:

1. The Committee respectfully requests the entry of an order extending the Objection Deadline for the Committee for the following motions:

- a. Debtor’s Motion for entry of interim and final orders (I) authorizing the Debtor to (A) continue using its cash management system, (B) maintain its existing bank accounts and business forms and (C) continue transactions with affiliates, and (II) granting related relief (the “Cash Management System Motion”);
- b. Motion for entry of interim and final orders (I) authorizing the Debtor to use cash collateral, and (II) granting adequate protection and providing security and other relief to FCC, LLC (the “Cash Collateral Motion”); and
- c. Debtor’s Motion (I) for interim and final orders (A) authorizing the Debtor to pay certain prepetition (1) wages, salaries and other compensation, (2) reimbursable employee expenses, and (3) obligations relating to benefits programs, or in the alternative, (II) authorizing the Debtors to pay certain prepetition claims for

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compensation and commissions related to affiliate employees and ADP as critical vendors, (B) granting related relief, and (III) scheduling a final hearing (the “*Wages Motion*” and together with the Cash Management System Motion and the Cash Collateral Motion, the “*Motions*”).

2. The Committee was appointed on May 11, 2015 and selected Freeborn & Peters LLP as its counsel on that same date.

3. Since its appointment, the Committee and its counsel have been working diligently to gain a thorough understanding of the Debtor’s history, corporate and financial structure, and the pleadings filed in this chapter 11 case. The Committee has also engaged in numerous discussions with the Debtor regarding pending motions and the overall status of this chapter 11 case.

4. The Debtor filed the Motions prior to the appointment of the Committee. Interim orders with respect to the Cash Management System Motion and the Cash Collateral Motion were entered on May 5, 2015, which was six days prior to the appointment of the Committee.

5. The Wages Motion was scheduled for presentment the morning after the Committee was appointed. Counsel for the Committee attended the hearing and an interim order was entered on that same date.

6. The interim order for each of the Motions provides that May 19, 2015 is the Objection Deadline with respect to the entry of final orders (the “*Final Orders*”).

7. The Committee respectfully requests that the Objection Deadline be extended through and including May 22, 2015 *solely for the Committee*. The Committee was only recently appointed, and the relief that may be granted in the Final Orders will have a substantial impact on this chapter 11 case. Indeed, the Final Orders seek to authorize the Debtor to, *inter alia*: (i) conduct business in the “ordinary course” with non-debtor affiliates; (ii) grant multiple forms of adequate protection to the Debtor’s pre-petition lender (including liens on chapter 5

causes of action); and (iii) pay wages and other compensation to employees of non-debtor affiliates.

8. The Committee submits that extending the Objection Deadline by three days will provide sufficient time for the Committee to complete its analysis of the potential issues in the Motions, discuss the potential issues with the Debtor and other parties-in-interest, and prepare and file objections in the event an agreement cannot be reached on any issues.

9. Additionally, the final hearing on the Motions is scheduled for May 26, 2015. Accordingly, the Committee submits that extending the Objection Deadline to May 22, 2015 will still provide the parties time to review and discuss any objection that is filed, and provide the Court with time to review any filed objection.

10. Based upon the foregoing, the Committee submits that the Objection Deadline should be extended through and including May 22, 2015 solely for the Committee.

11. The Committee has discussed the extension with the Debtor, and the Debtor has no objection to the relief requested herein.

WHEREFORE, the Committee respectfully requests that the Court: (a) extend the Objection Deadline through and including May 22, 2015 solely for the Committee; and (b) grant such other and further relief as the Court deems just and proper.

Dated: May 15, 2015

**OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF GULF PACKAGING, INC.**

By: /s/ Shelly A. DeRousse
One of Its Proposed Attorneys

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