

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re: ) Chapter 11  
)  
J.L. FRENCH AUTOMOTIVE CASTINGS, ) Case No. 09-12445 (KG)  
INC.,<sup>1</sup> )  
Debtors. ) (Jointly Administered)  
)  
**Re: Docket No. 189**

**AMENDED NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING ON  
AUGUST 17, 2009 AT 11:00 A.M. BEFORE THE HONORABLE KEVIN GROSS AT  
THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF  
DELAWARE, LOCATED AT 824 MARKET STREET, 6TH FLOOR, COURTROOM  
NO. 3, WILMINGTON, DELAWARE 19801**

**CONTINUED MATTERS:**

1. Application for Entry of an Order Authorizing the Employment and Retention of Conway Mackenzie, Inc. as Financial Advisor to the Debtors and Debtors-in-Possession Nunc Pro Tunc to the Petition Date [Filed: 7/13/09] (Docket No. 6)

Related Documents:

- a. [Proposed] Order Authorizing the Employment and Retention of Conway Mackenzie, Inc. as Financial Advisor to the Debtors and Debtors-in-Possession Nunc Pro Tunc to the Petition Date [Filed: 7/13/09] (Docket No. 6)
- b. Notice of Application for Entry of an Order Authorizing the Employment and Retention of Conway Mackenzie, Inc. as Financial Advisor to the Debtors and Debtors-in-Possession Nunc Pro Tunc to the Petition Date [Filed: 7/15/09] (Docket No. 94)

Response Deadline: August 10, 2009, at 4:00 p.m., and extended for the Office of the United States Trustee (the "U.S. Trustee") through August 31, 2009 at 4:00 p.m.

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1 The Debtors in these cases along with the last four digits of each of the Debtors' federal tax identification numbers are: J.L. French Automotive Castings, Inc., (3670); French Holdings LLC, (0518); Nelson Metal Products LLC (4939); Allotech International LLC (5832); J.L. French LLC (8901); J.L. French Automotive, LLC (7075); Central Die, LLC (7793). The Debtors' headquarters and mailing address is: 3101 South Taylor Drive, Sheboygan, WI 53082.

Responses Received: None as of the date of this Notice of Agenda.

Status: This matter is continued until September 3, 2009, at 10:00 a.m.

2. Motion of the Debtors for an Order Providing That Any Creditors Committee Appointed in These Cases is Not Required to Provide Access to Confidential Information of the Debtors or to Privileged Information [Filed: 7/13/09] (Docket No. 10)

Related Documents:

- a. [Proposed] Order Providing That Any Creditors Committee Appointed in These Cases is Not Required to Provide Access to Confidential Information of the Debtors or to Privileged Information [Filed: 7/13/09] (Docket No. 10)
- b. Notice of Motion of the Debtors for an Order Providing That Any Creditors Committee Appointed in These Cases is Not Required to Provide Access to Confidential Information of the Debtors or to Privileged Information [Filed: 7/15/09] (Docket No. 92)

Response Deadline: August 10, 2009, at 4:00 p.m.

Responses Received: None as of the date of this Notice of Agenda.

Status: This matter is continued in light of the fact that no Committee has been appointed. The Debtors reserve the right to proceed with the Motion if a Committee is subsequently appointed.

**UNCONTESTED MATTERS FOR WHICH CNOS HAVE BEEN FILED:**

3. Application for an Entry of an Order Authorizing Retention and Employment of Varnum LLP Nunc Pro Tunc to the Petition Date as Special Counsel for the Debtors Under Sections 327(e) and 328(a) of the Bankruptcy Code [Filed: 7/13/09] (Docket No. 5)

Related Documents:

- a. [Proposed] Order Authorizing Retention and Employment of Varnum LLP Nunc Pro Tunc to the Petition Date as Special Counsel for the Debtors Under Sections 327(e) and 328(a) of the Bankruptcy Code [Filed: 7/13/09] (Docket No. 5, Exhibit A)
- b. Notice of Application for Entry of an Order Authorizing Retention and Employment of Varnum LLP Nunc Pro Tunc to the Petition Date as Special Counsel for the Debtors Under Sections 327(e) and 328(a) of the Bankruptcy Code [Filed: 7/15/09] (Docket No. 95)

- c. Certification of No Objection Regarding Application for an Entry of an Order Authorizing Retention and Employment of Varnum LLP Nunc Pro Tunc to the Petition Date as Special Counsel for the Debtors Under Sections 327(e) and 328(a) of the Bankruptcy Code [Filed: 8/13/09] (Docket No. 177)

Response Deadline: August 10, 2009, at 4:00 p.m.

Responses Received: None as of the date of this Notice of Agenda.

Status: No parties have objected to the relief requested in the Application. Accordingly, the Debtors have filed a certificate of no objection and respectfully request the entry of the order attached to the Application.

4. Application for Order Pursuant to 11 U.S.C. §§ 327(a) and 328(a), Fed. R. Bankr. P. 2014(a) and Del. Bankr. L.R. 2014-1 Authorizing Employment and Retention of Milbank, Tweed, Hadley & McCloy LLP as Attorneys Nunc Pro Tunc to Petition Date [Filed: 7/13/09] (Docket No. 8)

Related Documents:

- a. [Proposed] Order Pursuant to 11 U.S.C. §§ 327(a) and 328(a), Fed. R. Bankr. P. 2014(a) and Del. Bankr. L.R. 2014-1 Authorizing Employment and Retention of Milbank, Tweed, Hadley & McCloy LLP as Attorneys Nunc Pro Tunc to Petition Date [Filed: 7/13/09] (Docket No. 8)
- b. Notice of Application for Order Pursuant to 11 U.S.C. §§ 327(a) and 328(a), Fed. R. Bankr. P. 2014(a) and Del. Bankr. L.R. 2014-1 Authorizing Employment and Retention of Milbank, Tweed, Hadley & McCloy LLP as Attorneys Nunc Pro Tunc to Petition Date [Filed: 7/15/09] (Docket No. 101)
- c. Certification of No Objection Regarding Application for Order Pursuant to 11 U.S.C. §§ 327(a) and 328(a), Fed. R. Bankr. P. 2014(a) and Del. Bankr. L.R. 2014-1 Authorizing Employment and Retention of Milbank, Tweed, Hadley & McCloy LLP as Attorneys Nunc Pro Tunc to Petition Date [Filed: 8/13/09] (Docket No. 178)

Response Deadline: August 10, 2009, at 4:00 p.m., and extended for the U.S. Trustee through August 12, 2009 at 4:00 p.m.

Responses Received: None as of the date of this Notice of Agenda.

Status: No parties have objected to the relief requested in the Application. Accordingly, the Debtors have filed a certificate of no objection and respectfully request the entry of the order attached to the Application.

5. Motion of the Debtors for Entry of an Order Establishing Deadline for Filing Proofs of Claim and Approving Form and Manner of Notice Thereof [Filed: 7/13/09] (Docket No. 9)

Related Documents:

- a. [Proposed] Order Establishing Deadline for Filing Proofs of Claim and Approving Form and Manner of Notice Thereof [Filed: 7/13/09] (Docket No. 9)
- b. Notice of Motion of the Debtors for Entry of an Order Establishing Deadline for Filing Proofs of Claim and Approving Form and Manner of Notice Thereof [Filed: 7/15/09] (Docket No. 91)
- c. Certification of No Objection Regarding Motion of the Debtors for Entry of an Order Establishing Deadline for Filing Proofs of Claim and Approving Form and Manner of Notice Thereof [Filed: 8/13/09] (Docket No. 176)

Response Deadline: August 10, 2009, at 4:00 p.m.

Responses Received: None as of the date of this Notice of Agenda.

Status: No parties have objected to the relief requested in the Motion. Accordingly, the Debtors have filed a certificate of no objection and respectfully request the entry of the order attached to the Motion.

6. Motion of the Debtors for Entry of an Order Authorizing the Debtors to Employ and Compensate Certain Professionals Utilized in the Ordinary Course of the Debtors' Businesses [Filed: 7/13/09] (Docket No. 14)

Related Documents:

- a. [Proposed] Order Authorizing the Debtors to Employ and Compensate Certain Professionals Utilized in the Ordinary Course of the Debtors' Businesses [Filed: 7/13/09] (Docket No. 14)
- b. Notice of Motion of the Debtors for Entry of an Order Authorizing the Debtors to Employ and Compensate Certain Professionals Utilized in the Ordinary Course of the Debtors' Businesses [Filed: 7/15/09] (Docket No. 93)
- c. Certification of Counsel Regarding Motion of the Debtors for Entry of an Order Authorizing the Debtors to Employ and Compensate Certain Professionals Utilized in the Ordinary Course of the Debtors' Businesses [Filed: 8/13/09] (Docket No. 182)

Response Deadline: August 10, 2009, at 4:00 p.m., and extended for the U.S. Trustee

through August 12, 2009 at 4:00 p.m.

Responses Received: None as of the date of this Notice of Agenda.

Status: No parties have objected to the relief requested in the Motion. Accordingly, the Debtors have filed a certificate of no objection and respectfully request the entry of the order attached thereto.

7. Debtors' Motion for an Order Establishing Procedures for Interim Compensation Pursuant to Section 331 of the Bankruptcy Code [Filed: 7/13/09] (Docket No. 15)

Related Documents:

- a. [Proposed] Administrative Order Under 11 U.S.C. §§ 105(a) and 331 Establishing Procedures for Interim Compensation and Expense Reimbursement of Professionals and Committee Members [Filed: 7/13/09] (Docket No. 15)
- b. Notice of Debtors' Motion for an Order Establishing Procedures for Interim Compensation Pursuant to Section 331 of the Bankruptcy Code [Filed: 7/15/09] (Docket No. 85)
- c. Certification of No Objection Regarding Debtors' Motion for an Order Establishing Procedures for Interim Compensation Pursuant to Section 331 of the Bankruptcy Code [Filed: 8/13/09] (Docket No. 179)

Response Deadline: August 10, 2009, at 4:00 p.m.

Responses Received: None as of the date of this Notice of Agenda.

Status: No parties have objected to the relief requested in the Motion. Accordingly, the Debtors have filed a certificate of no objection and respectfully request the entry of the order attached to the Motion.

8. Final Hearing on Motion of the Debtors for Entry of an Order Pursuant to 11 U.S.C. § 546(c): (I) Establishing Procedures for Resolution of Reclamation Claims; and (II) Prohibiting Sellers of Goods From Reclaiming or Otherwise Interfering with Debtors' Possession of Certain Goods [Filed: 7/13/09] (Docket No. 16)

Related Documents:

- a. [Signed] Interim Order Pursuant to 11 U.S.C. § 546(c): (I) Establishing Procedures for Resolution of Reclamation Claims; and (II) Prohibiting Sellers of Goods From Reclaiming or Otherwise Interfering with Debtors' Possession of Certain Goods [Filed: 7/14/09] (Docket No. 74)

- b. Notice of Entry of Interim Order and Final Hearing on Motion of the Debtors for Entry of an Order Pursuant to 11 U.S.C. § 546(c): (I) Establishing Procedures for Resolution of Reclamation Claims; and (II) Prohibiting Sellers of Goods From Reclaiming or Otherwise Interfering with Debtors' Possession of Certain Goods [Filed: 7/15/09] (Docket No. 98)
- c. Certification of No Objection Regarding Motion of the Debtors for Entry of an Order Pursuant to 11 U.S.C. § 546(c): (I) Establishing Procedures for Resolution of Reclamation Claims; and (II) Prohibiting Sellers of Goods From Reclaiming or Otherwise Interfering with Debtors' Possession of Certain Goods [Filed: 8/13/09] (Docket No. 180)

Response Deadline: August 10, 2009, at 4:00 p.m.

Responses Received: None as of the date of this Notice of Agenda.

Status: No parties have objected to the relief requested in the Motion. Accordingly, the Debtors have filed a certificate of no objection and respectfully request the entry of the order attached thereto.

- 9. Final Hearing on Motion of the Debtors for Entry of an Order Under 11 U.S.C. §§ 363, 364, 1107 and 1108 (I) Authorizing (A) Continued Use of Cash Management System, (B) Maintenance of Existing Bank Accounts, (C) Continued Use of Existing Business Forms and (D) Continued Use of Existing Investment Guidelines; (II) Granting Superpriority Administrative Priority Status to Postpetition Intercompany Claims; and (III) Authorizing Continued Performance Under Intercompany Arrangements and Historical Practices [Filed: 7/13/09] (Docket No. 19)

Related Documents:

- a. [Signed] Order Under 11 U.S.C. §§ 363, 364, 1107 and 1108 (I) Authorizing (A) Continued Use of Cash Management System, (B) Maintenance of Existing Bank Accounts, (C) Continued Use of Existing Business Forms and (D) Continued Use of Existing Investment Guidelines; (II) Granting Superpriority Administrative Priority Status to Postpetition Intercompany Claims; and (III) Authorizing Continued Performance Under Intercompany Arrangements and Historical Practices [Filed: 7/14/09] (Docket No. 66)
- b. Notice of (1) Entry of Order Granting Motion of the Debtors for Entry of an Order Under 11 U.S.C. §§ 363, 364, 1107 and 1108 (I) Authorizing (A) Continued Use of Cash Management System, (B) Maintenance of Existing Bank Accounts, (C) Continued Use of Existing Business Forms and (D) Continued Use of Existing Investment Guidelines; (II) Granting Superpriority Administrative Priority Status to Postpetition Intercompany Claims; and (III) Authorizing Continued Performance Under Intercompany Arrangements and Historical

Practices, and (2) Scheduling of Final Hearing on Debtors' Request for a Limited Waiver of Section 354(b) of the Bankruptcy Code, and the Debtors' Request for Superpriority Status to be Granted to Postpetition Intercompany Claims [Filed: 7/14/09] (Docket No. 78)

- c. Certification of No Objection Regarding Final Relief Sought on the Motion of the Debtors for Entry of an Order Under 11 U.S.C. §§ 363, 364, 1107 and 1108 (I) Authorizing (A) Continued Use of Cash Management System, (B) Maintenance of Existing Bank Accounts, (C) Continued Use of Existing Business Forms and (D) Continued Use of Existing Investment Guidelines; (II) Granting Superpriority Administrative Priority Status to Postpetition Intercompany Claims; and (III) Authorizing Continued Performance Under Intercompany Arrangements and Historical Practices [Filed: 8/13/09] (Docket No. 185)

Response Deadline: August 10, 2009, at 4:00 p.m.

Responses Received: None as of the date of this Notice of Agenda.

Status: No parties have objected to the relief requested in the Motion. Accordingly, the Debtors have filed a certificate of no objection and respectfully request the entry of the order attached thereto.

10. Final Hearing on Motion of the Debtors for Entry of an Order Pursuant to 11 U.S.C. §§ 105, 361, 362, 363 and 364 and Federal Rule of Bankruptcy Procedure 4001: (I) Authorizing Debtors to Obtain Postpetition Financing on a Secured, Superpriority Priming Basis; (II) Authorizing Debtors' Use of Cash Collateral; (III) Granting Adequate Protection to Prepetition Secured Parties; and (IV) Scheduling a Final Hearing [Filed: 7/13/09] (Docket No. 21)

Related Documents:

- a. Notice of Filing Budget Related to Motion of the Debtors for Entry of an Order Pursuant to 11 U.S.C. §§ 105, 361, 362, 363 and 364 and Federal Rule of Bankruptcy Procedure 4001: (I) Authorizing Debtors to Obtain Postpetition Financing on a Secured, Superpriority Priming Basis; (II) Authorizing Debtors' Use of Cash Collateral; (III) Granting Adequate Protection to Prepetition Secured Parties; and (IV) Scheduling a Final Hearing [Filed: 7/14/09] (Docket No. 48)
- b. [Signed] Interim Order Pursuant to Sections 361, 362, 363 and 364 of the Bankruptcy Code and Rule 4001 of the Federal Rules of Bankruptcy Procedure (A) Authorizing the Debtors to (I) Use Cash Collateral, (II) Obtain Postpetition Financing and (III) Provide Adequate Protection, and (B) Providing Notice and Scheduling of Final Hearing [Filed: 7/14/09] (Docket No. 69)

- c. Certification of No Objection Regarding Motion of the Debtors for Entry of an Order Pursuant to 11 U.S.C. §§ 105, 361, 362, 363 and 364 and Federal Rule of Bankruptcy Procedure 4001: (I) Authorizing Debtors to Obtain Postpetition Financing on a Secured, Superpriority Priming Basis; (II) Authorizing Debtors' Use of Cash Collateral; (III) Granting Adequate Protection to Prepetition Secured Parties; and (IV) Scheduling a Final Hearing [Filed: 8/13/09] (Docket No. 188)

Response Deadline: August 10, 2009, at 4:00 p.m.

Responses Received: None as of the date of this Notice of Agenda.

Status: No parties have objected to the relief requested in the Motion. Accordingly, the Debtors have filed a certificate of no objection and respectfully request the entry of the final order attached thereto.

11. Application of the Debtors Pursuant to Section 327(a) of the Bankruptcy Code, Rule 2014 of the Federal Rules of Bankruptcy Procedure and Local Rule 2014-1 for Authorization to Employ and Retain Pachulski Stang Ziehl & Jones LLP as Counsel for the Debtors and Debtors in Possession Nunc Pro Tunc to the Petition Date [Filed: 7/13/09] (Docket No. 23)

Related Documents:

- a. [Proposed] Order Under Section 327(a) of the Bankruptcy Code, Rule 2014 of the Federal Rules of Bankruptcy Procedure and Local Rule 2014-1 for Authorization to Employ and Retain Pachulski Stang Ziehl & Jones LLP as Counsel for the Debtors and Debtors in Possession Nunc Pro Tunc to the Petition Date [Filed: 7/13/09] (Docket No. 23)
- b. Notice of Application of the Debtors Pursuant to Section 327(a) of the Bankruptcy Code, Rule 2014 of the Federal Rules of Bankruptcy Procedure and Local Rule 2014-1 for Authorization to Employ and Retain Pachulski Stang Ziehl & Jones LLP as Counsel for the Debtors and Debtors in Possession Nunc Pro Tunc to the Petition Date [Filed: 7/15/09] (Docket No. 99)
- c. Certification of No Objection Regarding Application of the Debtors Pursuant to Section 327(a) of the Bankruptcy Code, Rule 2014 of the Federal Rules of Bankruptcy Procedure and Local Rule 2014-1 for Authorization to Employ and Retain Pachulski Stang Ziehl & Jones LLP as Counsel for the Debtors and Debtors in Possession Nunc Pro Tunc to the Petition Date [Filed: 8/13/09] (Docket No. 183)

Response Deadline: August 10, 2009, at 4:00 p.m., and extended for the U.S. Trustee through August 12, 2009 at 4:00 p.m.

Responses Received: None as of the date of this Notice of Agenda.



Status: No parties have objected to the relief requested in the Application. Accordingly, the Debtors have filed a certificate of no objection and respectfully request the entry of the order attached to the Application.

12. Application for Entry of an Order Authorizing the Employment and Retention of Ernst & Young LLP as Tax Service Providers and Tax Consultants to the Debtors and Debtors-in-Possession Nunc Pro Tunc to the Petition Date [Filed: 7/30/09] (Docket No. 160)

Related Documents:

- a. [Proposed] Order Authorizing the Employment and Retention of Ernst & Young LLP as Tax Service Providers and Tax Consultants to the Debtors and Debtors-in-Possession [Filed: 7/30/09] (Docket No. 160, Exhibit 2)
- b. Notice of Application for Entry of an Order Authorizing the Employment and Retention of Ernst & Young LLP as Tax Service Providers and Tax Consultants to the Debtors and Debtors-in-Possession Nunc Pro Tunc to the Petition Date [Filed: 7/30/09] (Docket No. 160)
- c. Certification of No Objection Regarding Application for Entry of an Order Authorizing the Employment and Retention of Ernst & Young LLP as Tax Service Providers and Tax Consultants to the Debtors and Debtors-in-Possession Nunc Pro Tunc to the Petition Date [Filed: 8/13/09] (Docket No. 184)

Response Deadline: August 10, 2009, at 4:00 p.m., and extended for the U.S. Trustee through August 12, 2009 at 4:00 p.m.

Responses Received: None as of the date of this Notice of Agenda.

Status: No parties have objected to the relief requested in the Application. Accordingly, the Debtors have filed a certificate of no objection and respectfully request the entry of the order attached to the Application.

13. Debtors' Motion for an Order Approving Voting Procedures with Respect to Debtors' First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Filed: 7/30/09] (Docket No. 159)

Related Documents:

- a. [Proposed] Order (I) Approving Disclosure Statement for the Debtors' First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code; and (II) Approving Voting Procedures [Filed: 7/30/09] (Docket No. 159)

- b. Notice of Hearing on Debtors' Motion for an Order Approving Voting Procedures with Respect to Debtors' First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Filed: 7/30/09] (Docket No. 159)
- c. Certification of No Objection Regarding Debtors' Motion for an Order Approving Voting Procedures with Respect to Debtors' First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Filed: 8/13/09] (Docket No. 186)

Response Deadline: August 12, 2009, at 4:00 p.m.

Responses Received: None as of the date of this Notice of Agenda.

Status: No parties have objected to the relief requested in the Motion. Accordingly, the Debtors have filed a certificate of no objection and respectfully request the entry of the order attached to the Motion.

#### **UNCONTESTED MATTERS:**

- 14. Final Hearing on Motion of the Debtors for Entry of Interim and Final Orders Under 11 U.S.C. §§ 105(a) and 366: (I) Prohibiting Utilities From Discontinuing, Altering or Refusing Service: (II) Establishing Procedures for Determining Adequate Assurances of Payment: and (III) Establishing Procedures for the Utilities to Opt Out of the Debtors' Proposed Procedures for Adequate Assurance [Filed: 7/13/09] (Docket No. 18)

#### Related Documents:

- a. [Proposed] Final Order Under 11 U.S.C. §§ 105(a) and 366: (I) Prohibiting Utilities From Discontinuing, Altering or Refusing Service: (II) Establishing Procedures for Determining Adequate Assurances of Payment: and (III) Establishing Procedures for the Utilities to Opt Out of the Debtors' Proposed Procedures for Adequate Assurance [Filed: 7/13/09] (Docket No. 18)
- b. [Signed] Interim Order Under 11 U.S.C. §§ 105(a) and 366: (I) Prohibiting Utilities From Discontinuing, Altering or Refusing Service: (II) Establishing Procedures for Determining Adequate Assurances of Payment: and (III) Establishing Procedures for the Utilities to Opt Out of the Debtors' Proposed Procedures for Adequate Assurance [Filed: 7/14/09] (Docket No. 76)
- c. Notice of Entry of Interim Order and Final Hearing on Motion of the Debtors for Entry of Interim and Final Orders Under 11 U.S.C. §§ 105(a) and 366: (I) Prohibiting Utilities From Discontinuing, Altering or Refusing Service: (II) Establishing Procedures for Determining Adequate Assurances of Payment: and (III) Establishing Procedures for the Utilities to Opt Out of the Debtors' Proposed Procedures for Adequate Assurance [Filed: 7/15/09] (Docket No. 97)

Response Deadline: August 10, 2009, at 4:00 p.m., and extended through August 14, 2009 at 4:00 p.m. for Integrys Energy Services, Inc. (“Integrys”), and extended on an open basis for Farmers Rural Electric Cooperative Corporation (“Farmers”)

Responses Received: None as of the date of this Notice of Agenda.

Status: No formal objections to the entry of a final order granting the relief sought in the Motion have been filed. The Debtors have, however, been contacted by Integrys and Farmers regarding the final relief sought in the Motion, and are in the process of discussions with such parties, and have extended the objection deadline for such parties, as set forth above. The Debtors anticipate that the concerns raised by Integrys and Farmers will be resolved on a consensual basis prior to the hearing. This matter will go forward.

15. Motion for Entry of an Order Pursuant to 11 U.S.C. §§ 105 and 363 Authorizing Debtors to (I) Make Payments to Potential Exit Facility Lenders for Diligence, Negotiation, Preparation and Documentation of an Exit Financing Facility and (II) Engage Asset Appraiser and/or Collateral Auditor in Connection Therewith [Filed: 8/10/09] (Docket No. 169)

Related Documents:

- a. [Proposed] Order Granting Motion for Entry of an Order Pursuant to 11 U.S.C. §§ 105 and 363 Authorizing Debtors to (I) Make Payments to Potential Exit Facility Lenders for Diligence, Negotiation, Preparation and Documentation of an Exit Financing Facility and (II) Engage Asset Appraiser and/or Collateral Auditor in Connection Therewith [Filed: 8/10/09] (Docket No. 169)
- b. [Signed] Order Granting Motion to Fix Hearing Date on and Shorten Time to Object or Respond to Debtors’ Motion for Entry of an Order Pursuant to 11 U.S.C. §§ 105 and 363 Authorizing Debtors to (I) Make Payments to Potential Exit Facility Lenders for Diligence, Negotiation, Preparation and Documentation of an Exit Financing Facility and (II) Engage Asset Appraiser and/or Collateral Auditor in Connection Therewith [Filed: 8/10/09] (Docket No. 170)
- c. Notice of Hearing on Motion for Entry of an Order Pursuant to 11 U.S.C. §§ 105 and 363 Authorizing Debtors to (I) Make Payments to Potential Exit Facility Lenders for Diligence, Negotiation, Preparation and Documentation of an Exit Financing Facility and (II) Engage Asset Appraiser and/or Collateral Auditor in Connection Therewith [Filed: 8/10/09] (Docket No. 174)
- d. **Certification of No Objection Regarding Motion for Entry of an Order Pursuant to 11 U.S.C. §§ 105 and 363 Authorizing Debtors to (I) Make Payments to Potential Exit Facility Lenders for Diligence, Negotiation, Preparation and Documentation of an Exit Financing Facility and (II)**

**Engage Asset Appraiser and/or Collateral Auditor in Connection Therewith  
[Filed: 8/14/09] (Docket No. 209)**

Response Deadline: August 14, 2009, at 12:00 p.m.

Responses Received: None as of the date of this Notice of Agenda.

Status: No parties have objected to the relief requested in the Motion. Accordingly, the Debtors have filed a certificate of no objection and respectfully request the entry of the order attached to the Motion.

**DISCLOSURE STATEMENT HEARING**

16. Hearing on Adequacy of Disclosure Statement for the Debtors' First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Filed: 7/26/09] (Docket No. 150)

Related Documents:

- a. The Debtors' First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Filed: 7/26/09] (Docket No. 149)
- b. [Signed] Agreed Order Scheduling Hearing on the Debtors' Disclosure Statement and the Objection Deadline Related Thereto [Filed: 7/27/09] (Docket No. 152)
- c. Notice of (I) Hearing to Approve the Adequacy of Disclosure Statement and (II) Date by Which to File and Serve Objections [Filed: 7/27/09] (Docket No. 153)
- d. **The Debtors' First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Filed: 8/13/09] (Docket No. 190)**
- e. **Blackline of The Debtors' First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Filed: 8/13/09] (Docket No. 191)**
- f. **Disclosure Statement for the Debtors' First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Filed: 8/13/09] (Docket No. 192)**
- g. **Blackline of Disclosure Statement for the Debtors' First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Filed: 8/13/09] (Docket No. 193)**
- h. **Supplement to the Debtors' First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Filed: 8/13/09] (Docket No. 194)**

- i. **Certification of No Objection Regarding Hearing on the Adequacy of Disclosure Statement for the Debtors' First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Filed: 8/14/09] (Docket No. 201)**

Response Deadline: August 13, 2009, at 4:00 p.m.

Responses Received: None as of the date of this Notice of Agenda.

**Status: This matter will go forward. A certificate of no objection has been filed and the Debtors will request approval of the Disclosure Statement at the hearing.**

**CONTESTED MATTERS:**

17. Application for Entry of an Order Authorizing Retention and Employment of Houlihan Lokey Howard & Zukin Capital, Inc. as Investment Banker to the Debtors and Debtors-In-Possession Nunc Pro Tunc to the Petition Date [Filed: 7/13/09] (Docket No. 7)

Related Documents:

- a. [Proposed] Order Authorizing the Debtors to Retain Houlihan Lokey Howard & Zukin Capital, Inc. as Investment Banker to the Debtors [Filed: 7/13/09] (Docket No. 7)
- b. Notice of Application for Entry of an Order Authorizing Retention and Employment of Houlihan Lokey Howard & Zukin Capital, Inc. as Investment Banker to the Debtors and Debtors-In-Possession Nunc Pro Tunc to the Petition Date [Filed: 7/15/09] (Docket No. 96)

Response Deadline: August 10, 2009, at 4:00 p.m., and extended for the U.S. Trustee through August 12, 2009 at 4:00 p.m.

Responses Received:

- a. Acting United States Trustee's Objection to Application for Entry of an Order Authorizing Retention and Employment of Houlihan Lokey Howard & Zukin Capital. as Investment Banker to the Debtors and Debtors-in-Possession Nunc Pro Tunc to the Petition Date [Filed: 8/12/09] (Docket No. 175)

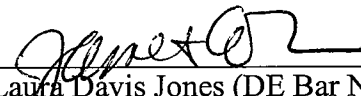
Status: This matter will go forward.

Dated: August 14, 2009

MILBANK, TWEED, HADLEY & MCCLOY LLP  
Gregory A. Bray (CA Bar No. 115367)  
Fred Neufeld (CA Bar No. 150759)  
Haig M. Maghakian (CA Bar No. 221954)  
601 South Figueroa Street, 30<sup>th</sup> Floor  
Los Angeles, CA 90017-5735  
Telephone: 213-892-4000  
Facsimile: 213-629-5063  
Email: gbray@milbank.com  
fneufeld@milbank.com  
hmaghakian@milbank.com

and

PACHULSKI STANG ZIEHL & JONES LLP

  
\_\_\_\_\_  
Laura Davis Jones (DE Bar No. 2436)  
James E. O'Neill (DE Bar No. 4042)  
Curtis A. Hehn (DE Bar No. 4264)  
Mark M. Billion (DE Bar No. 5263)  
919 North Market Street, 17<sup>th</sup> Floor  
P.O. Box 8705  
(Courier Route 19801)  
Wilmington, DE 19898  
Telephone: 302-652-4100  
Facsimile: 302-652-4400  
E-mail: ljones@pszjlaw.com  
joneill@pszjlaw.com  
chehn@pszjlaw.com  
mbillion@pszjlaw.com

[Proposed] Counsel for Debtors and Debtors in Possession