#### IN THE UNITED STATES BANKRUPTCY COURT

### FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
J.L. FRENCH AUTOMOTIVE CASTINGS, INC., <sup>1</sup>	) ) )	Case No. 09-12445 (KG)
	Ć	(Joint Administration pending)
	)	
Debtors.	)	

NOTICE OF AGENDA FOR HEARING ON FIRST DAY MOTIONS SCHEDULED FOR JULY 14, 2009 AT 1:00 P.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

This agenda sets forth items in the order they appear in the first day motions binders delivered to the Court. The status of each is set forth below.

- 1. Voluntary Petitions with Board Resolutions.
  - a. J.L. French Automotive Castings, Inc.
  - b. French Holdings, Inc.
  - c. Nelson Metal Products LLC
  - d. Allotech International LLC
  - e. J.L. French LLC
  - f. JL French Automotive LLC
  - g. Central Die, LLC
- 2. Affidavit of Thomas Musgrave of J.L. French Automotive Castings, Inc., in Support of First Day Motions (Filed 7/13/09) [Docket No. 3].

<u>Status</u>: The Declaration will be relied upon as evidentiary support for the first day matters listed herein.

<sup>1</sup> 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.

### **Administrative Motions**

3. Motion Of Debtors for an Order Directing Joint Administration of Related Chapter 11 Cases (Filed 7/13/09) [Docket No. 2].

Status: This matter is going forward.

4. Application of the Debtors to Employ and Retain BMC Group, Inc. as Notice, Claims and Balloting Agent to the Debtors and Debtors In Possession *Nunc Pro Tunc* to the Petition Date (Filed 7/13/09) [Docket No. 4].

Status: This matter is going forward.

### **Professional Retention Related Motions and Applications**

5. 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 & M<sup>c</sup>Cloy LLP as Attorneys *Nunc Pro Tunc* to Petition Date (Filed 7/13/09) [Docket No. 8].

<u>Status</u>: This matter will be served out on notice to be heard at a date and time to be determined.

6. 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 the 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].

Status: This matter will be served out on notice to be heard at a date and time to be determined.

7. 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 7/13/09) [Docket No. 5].

<u>Status</u>: This matter will be served out on notice to be heard at a date and time to be determined.

8. 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].

<u>Status</u>: This matter will be served out on notice to be heard at a date and time to be determined.

9. 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].

- Status: This matter will be served out on notice to be heard at a date and time to be determined.
- 10. 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].

Status: This matter will be served out on notice to be heard at a date and time to be determined.

11. 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].

Status: This matter will be served out on notice to be heard at a date and time to be determined.

# First Day Motions Pertaining to Business Operations

12. 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].

Status: This matter is going forward.

13. 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 Existing 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].

Status: This matter is going forward.

14. Motion Of The Debtors For Entry Of An Order Under 11 U.S.C. S§§ 105(A), 361, 362, 363 And 364 And Fed. R. Bankr. P. 6004(A) For An Order Authorizing: (I) Payment Of Prepetition Obligations Incurred In The Ordinary Course Of Business In Connection With Workers' Compensation, Liability, Property, And Other Insurance Programs, Including Payment Of Policy Premiums, And Brokers' Fees; And (II) Continuation Of Insurance Premium Financing Programs (Filed 7/13/09) [Docket No. 11].

15. Motion of the Debtors for Entry of an Order: (I) Authorizing the Debtors to Pay Prepetition (A) Wages, Salaries, and Other Compensation, (B) Employee Medical and Similar Benefits, and (C) Reimbursable Employee Expenses; and (II) Authorizing and Requiring Banks and Other Financial Institutions to Pay All Checks and Electronic Payment Requests Made by the Debtors Relating to the Foregoing (Filed 7/13/09) [Docket No. 17].

Status: This matter is going forward.

16. Motion of the Debtors for Entry of an Order (I) Authorizing the Debtors to Pay in the Ordinary Course of Business Prepetition Claims of Shippers and Other Lien Claimants and (II) Authorizing Financial Institutions to Pay All Checks and Electronic Payment Requests Made by the Debtors Relating to the Foregoing. (Filed 7/13/09) [Docket No. 12].

Status: This matter is going forward.

17. Motion of the Debtors for Entry of an Order Authorizing, but Not Requiring, the Debtors to Pay in the Ordinary Course of Business the Prepetition Claims of Essential Trade Creditors (Filed 7/13/09) [Docket No. 20].

Status: This matter is going forward.

18. 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].

Status: This matter will be served out on notice to be heard at a date and time to be determined.

19. Motion of the Debtors for Entry of an Order (I) Authorizing the Debtors to Remit and Pay Prepetition Sales, Use, and Franchise Taxes and Certain Other Government Charges and (II) Authorizing Banks and Other Financial Institutions to Receive, Process, Honor, and Pay Checks Issued and Electronic Payment Requests Made Relating to the Foregoing (Filed 7/13/09) [Docket No. 13].

Status: This matter is going forward.

20. Motion of the Debtors for Entry of an 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].

Status: The Debtors will present an interim order, and then seek scheduling of a final hearing on the Motion.

21. 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].

<u>Status</u>: This matter will be served out on notice to be heard at a date and time to be determined.

# First Day Motion Pertaining to Postpetition Secured Financing

22. 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].

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Status: The Debtors will present an interim order, and then seek scheduling of a final hearing on the Motion.

Dated: July 13, 2009

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