# 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)
	)	(Joint Administration pending)
Debtors.	)	Related to Docket Nos. 2, 4, 11, 12, 13, 16, 17, 18, 19, 20, and 21

#### **NOTICE OF HEARING WITH RESPECT TO FIRST DAY MOTIONS**

PLEASE TAKE NOTICE that on July 13, 2009, the above-captioned debtors and debtors in possession herein (collectively, the "Debtors") filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") with the Clerk of the United States Bankruptcy Court for the District of Delaware. The Debtors are continuing to operate their businesses and manage their affairs as debtors and debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE that the Debtors will present the Motions set forth below at a hearing on July 14, 2009 at 1:00 p.m. prevailing Eastern Time 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.

<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**

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

#### First Day Motions Pertaining to Business Operations

- 3. 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].
- 4. 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].
- 5. 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].
- 6. 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].
- 7. 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].

- 8. 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].
- 9. 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].
- 10. 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].

## First Day Motion Pertaining to Postpetition Secured Financing

11. 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].

Copies of the afore-mentioned Motions may be obtained through the United States Bankruptcy Court's website at www.deb.uscourts.gov, referencing Case No. 09-12445, or by accessing the website of the Debtors' proposed claims, noticing and solicitation agent, BMC

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### Group, Inc., at www.bmcgroup.com/ilfrenchautomotivecastings.

Dated: July 13, 2009

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