

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
RC SOONER HOLDINGS, LLC, <u>et al.</u> , ¹)	Case No. 10-10528 (BLS)
)	
Debtors.)	(Jointly Administered)
)	
)	

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING ON
APRIL 19, 2010 AT 10:30 A.M. BEFORE THE HONORABLE BRENDAN LINEHAN
SHANNON AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT
OF DELAWARE, 824 N. MARKET STREET, 6TH FLOOR,
COURTROOM NO. 1, WILMINGTON, DE 19801**

RESOLVED MATTERS:

1. Motion for Entry of Interim and Final Orders (A) Authorizing Debtors in Possession to Use Cash Collateral, (B) Granting Replacement Liens to Fannie Mae, (C) Granting Adequate Protection, and (D) Scheduling a Final Hearing Thereon (Filed February 22, 2010) (Docket No. 7).

Related Documents:

- A. Interim and Agreed Order (A) Authorizing Debtors in Possession to Use Cash Collateral, (B) Granting Replacement Liens to Lender, (C) Granting Adequate Protection, and (D) Scheduling a Final Hearing (Entered on February 24, 2010) (Docket No. 20)
- B. Notice of Entry of Interim and Agreed Order (A) Authorizing Debtors in Possession to Use Cash Collateral, (B) Granting Replacement Liens to Lender, (C) Granting Adequate Protection,

¹ The Debtors and the last four digits of their taxpayer identification numbers are: RC Sooner Holdings, LLC (7904); RC Brixton Square Owner, LLC (8002); RC Cedar Crest Owner, LLC (7914); RC Fulton Plaza Owner, LLC (8011); RC Magnolia Owner, LLC (7998); RC Pomeroy Park Owner, LLC (7939); RC Salida Owner, LLC (7947); RC Savannah South Owner, LLC (7983); RC Southern Hills Owner, LLC (7958); Brixton Square Apartments, LLC (1844); CC Apartments, LLC (1798); Fulton Plaza Apartments, LLC (4344); Magnolia Manor Apartments, LLC (4486); Pomeroy Park Apartments, LLC (1649); Salida Apartments, LLC (1915); Savannah South Apartments, LLC (8586); and Southern Hills Villa Apartments, LLC (1721). The business address for each of the Debtors where notices should be sent is 1515 Broadway, 11th Floor, New York, New York 10036-8901.

and (D) Scheduling a Final Hearing (Filed February 24, 2010)
(Docket No. 25)

- C. Certification of Counsel Regarding Second Interim Agreed Order (A) Authorizing Debtors in Possession to Use Cash Collateral, (B) Granting Replacement Liens to Lender, (C) Granting Adequate Protection, and (D) Scheduling a Final Hearing (Filed on March 9, 2010) (Docket No. 48)
- D. Notice of Rescheduled Hearing on Interim Agreed Order (A) Authorizing Debtor in Possession to Use Cash Collateral, (B) Granting Replacement Liens to Lender, (C) Granting Adequate Protection, and (D) Scheduling a Final Hearing Thereon (Filed on March 9, 2010) (Docket No. 49)
- E. Second Interim Agreed Order (A) Authorizing Debtors in Possession to Use Cash Collateral, (B) Granting Replacement Liens to Lender, (C) Granting Adequate Protection, and (D) Scheduling a Final Hearing (Entered on March 11, 2010) (Docket No. 55)
- F. Notice of Entry Second Interim Agreed Order (A) Authorizing Debtors in Possession to Use Cash Collateral, (B) Granting Replacement Liens to Lender, (C) Granting Adequate Protection, and (D) Scheduling a Final Hearing (Filed on March 11, 2010) (Docket No. 56)
- G. Certification of Counsel Regarding Third Interim Agreed Order (A) Authorizing Debtors in Possession to Use Cash Collateral, (B) Granting Replacement Liens to Lender, (C) Granting Adequate Protection, and (D) Scheduling a Final Hearing (Filed on March 18, 2010) (Docket No. 71)
- H. Third Interim Agreed Order (A) Authorizing Debtors in Possession to Use Cash Collateral, (B) Granting Replacement Liens to Lender, (C) Granting Adequate Protection, and (D) Scheduling a Final Hearing (Filed on March 19, 2010) (Docket No. 75)
- I. Certification of Counsel Regarding Fourth Interim Agreed Order (A) Authorizing Debtors in Possession to Use Cash Collateral, (B) Granting Replacement Liens to Lender, (C) Granting Adequate Protection, and (D) Scheduling a Final Hearing (Filed on March 25, 2010) (Docket No. 91)
- J. Fourth Interim Agreed Order (A) Authorizing Debtors in Possession to Use Cash Collateral, (B) Granting Replacement

Liens to Lender, (C) Granting Adequate Protection, and (D) Scheduling a Final Hearing (Filed on March 26, 2010) (Docket No. 96)

Response Deadline: March 8, 2010 at 4:30 p.m. (prevailing Eastern Time), extended to March 15, 2010 at 4:30 p.m. (prevailing Eastern Time) as to Federal National Mortgage Association only.

Responses Received:

- A. Limited Objection of Fannie Mae to Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing Debtors in Possession to Use Cash Collateral, (B) Granting Replacement Liens to Fannie Mae, and (C) Granting Adequate Protection [Related to Docket Nos. 7, 20 and 55] (Filed on March 15, 2010) (Docket No. 60)

Status: The Debtors believe they have reached an agreement in principle to resolve this matter and expect to present a consensual for of order at the hearing.

2. Motion of Fannie Mae for Relief From Automatic Stay Pursuant to 11 U.S.C. § 362(d) and Rule 4001 of the Federal Rules of Bankruptcy Procedure (Filed on March 30, 2010) (Docket No. 105)

Response Deadline: April 12, 2010 at 4:00 p.m., extended to April 15, 2010 as to the Debtors (prevailing Eastern Time)

Responses Received: None.

Status: The Debtors believe they have reached an agreement in principle to resolve this matter and expect to present a consensual form of order at the hearing.

CONTESTED MATTERS GOING FORWARD

3. Motion of the Debtors for an Order Authorizing Production of Documents and Examination of a Representative Pursuant to Bankruptcy Rule 2004 (Filed on March 8, 2010) (Docket No. 44)

Response Deadline: March 15, 2010 at 4:00 p.m. (prevailing Eastern Time), extended by the Court to March 25, 2010 at 4:00 p.m. (prevailing Eastern Time) for the RemyCo Entities.

Related Documents:

- A. Motion to Continue Objection Deadline and Hearing Date on Debtors' 2004 Motion (Filed on March 15, 2010) (Docket No. 59)
- B. Certification of Counsel Regarding Motion of the Debtors for an Order Authorizing Production of Documents and Examination of a Representative Pursuant to Bankruptcy Rule 2004 (Docket No. 100)
- C. Notice of Service of Supplemental Response to debtor's Request for Production of documents (Filed on April 7, 2010) (Docket No. 131)

Responses Received:

- A. Response to Motion of the Debtors for an Order Authorizing Production of Documents and Examination of a Representative Pursuant to bankruptcy Rule 2004 (Filed on March 25, 2010) (Docket No. 85)

Status: This matter is going forward.

ADVERSARY PRETRIAL CONFERENCES

- 4. Complaint [RC Sooner Holdings, LLC, *et al.* v. Bank of the West, *et al.*, Adv. No. 10-50719] (Filed on February 23, 2010) (Docket No. 1)

Response Deadline: April 7, 2010 at 4:00 p.m. (prevailing Eastern Time).
Extended to April 15, 2010 at 4:00 p.m. (prevailing Eastern Time) for the RemyCo Entities.

Related Documents:

- A. Summons and Notice of Pre-Trial Conference (Filed on March 8, 2010) (Docket No. 3)

Responses Received: None.

Status: This matter is going forward.

- 5. Complaint [RC Sooner Holdings, LLC, *et al.* v. RemyCo., *et al.*, Adv. No. 10-50723] (Filed on February 24, 2010, 2010) (Docket No. 1)

Response Deadline: April 7, 2010 at 4:00 p.m. (prevailing Eastern Time). A stipulation was signed by the Debtors and the RemyCo.

Entities extending the Response Deadline to April 15, 2010
at 4:00 p.m. (prevailing Eastern Time)

Related Documents:

- A. Summons and Notice of Pre-Trial Conference (Filed on March 8, 2010) (Docket No. 3)
- B. Amended Complaint (Filed on March 17, 2010) (Docket No. 5)
- C. Certification of Counsel Regarding Motion to Extend Time to Answer, Move or Otherwise Plead to the Complaint (Filed on April 13, 2010) (Docket No. 10)
- D. Order Approving Motion to Extend RemyCo., Inc., *et al.*'s Time to Answer, Move or Otherwise Plead to the Complaint (Filed on April 14, 2010) (Docket No. 12)

Responses Received: None.

Status: This matter is going forward.

Dated: April 15, 2010
Wilmington, Delaware

Respectfully Submitted,

BALLARD SPAHR LLP

By: /s/ Tobey M. Daluz
Tobey M. Daluz, Esquire (No. 3939)
Sean J. Bellew, Esquire (No. 4072)
Christopher S. Chow, Esquire (No. 4172)
919 N. Market Street, 12th Floor
Wilmington, DE 19801
Telephone: (302) 252-4465
Facsimile: (302) 252-4466
Email: daluzt@ballardspahr.com
bellews@ballardspahr.com
chowc@ballardspahr.com

- and -

Matthew G. Summers, Esquire²
300 East Lombard Street, 18th Floor
Baltimore, MD 21202-3268
Telephone: (410) 528-5600
Facsimile: (410) 528-5650
Email: summersm@ballardspahr.com

Counsel for the Debtors and Debtors in Possession

² Admitted *pro hac vice*.