

J. Mark Chevallier, State Bar No. 04189170
James G. Rea, State Bar No. 24051234
McGUIRE, CRADDOCK & STROTHER, P.C.
2501 N. Harwood, Ste. 1800
Dallas, TX 75201
(214) 954-6800 Telephone
(214) 954-6850 Facsimile
Email: mchevallier@mcsllaw.com
Email: jrea@mcsllaw.com

and

Martin T. Fletcher, MD Bar No. 07608
Stephen F. Fruin, MD Bar No. 08456
Thomas J. Francella, Jr., DE Bar No 3835
WHITEFORD, TAYLOR AND PRESTON L.L.P.
Seven Saint Paul Street
Baltimore, MD 21202
(410) 347-8700 Telephone
(410) 752-7092 Facsimile
Email: mfletcher@wtplaw.com
Email: sfruin@wtplaw.com
Email: tfrancella@wtplaw.com

PROPOSED ATTORNEYS FOR SEDGEBROOK, INC.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

In re:	§	CASE NO. 10-34178-SGJ
	§	
SEDGEBROOK, INC.,	§	CHAPTER 11
	§	(Joint Administration Pending)
Debtor.	§	

REQUEST FOR EMERGENCY CONSIDERATION
OF CERTAIN "FIRST DAY" MATTERS

On June 15, 2010, Sedgebrook, Inc. (the "Debtor") filed a petition for relief under chapter 11 of title 11 of the United States Code. Counsel for the Debtor believes this case qualifies as a complex chapter 11 case. The Debtor needs emergency consideration of the following initial case matters:

- (a) Debtor's Motion to Extend Time to File Schedules and Statements of Financial Affairs;

- (b) Debtor's Emergency Motion to Approve Interim and Final Orders (I) Authorizing the Use of Cash Collateral (II) Granting Adequate Protection To Secured Creditors and (II) Scheduling Final Hearing;
- (c) Debtor's Motion for Authorization to Pay Certain Prepetition: (i) Wages, Salaries and Other Compensation; (ii) Employee Medical and Similar Benefits; and (iii) Other Miscellaneous Employee Expenses and Benefits;
- (d) Debtor's Motion for Entry of Interim and Final Orders: (i) Prohibiting Utility Companies From Altering, Refusing or Discontinuing Service to the Debtor; (ii) Deeming the Utility Companies Adequately Assured of Future Performance by the Debtor; (iii) Authorizing the Debtor to pay the Utilities a one Month Deposit; and (iv) Establishing Procedures for Determining Requests to the Debtor for Additional Adequate Assurance
- (e) Debtor's Motion for an Order Pursuant to Sections 345, 363(c)(1), 364(a) and 503(b)(1): (i) Approving the Continued Use of its Cash Management System, Bank Accounts and Business Forms; (ii) Granting Approval of Investment Guidelines; and (iii) Authorizing Banks to Honor Certain Transfers and Charge Certain Fees and Other Amounts;
- (f) Debtor's Motion for an Order Pursuant to 11 U.S.C. § 105(a) and Bankruptcy Rule 2002 Establishing Notice Procedures;
- (g) Debtor's Motion for an Order Authorizing Debtors to Escrow Initial Entrance Deposits;
- (h) Notice of Designation as Complex Chapter 11 Bankruptcy Case.

Dated: June 18, 2010
Dallas, Texas

Respectfully Submitted,

MCGUIRE, CRADDOCK & STROTHER, P.C.

By: /s/ J. Mark Chevallier
J. Mark Chevallier, Texas Bar No.04189170
James G. Rea, Texas Bar No. 24051234
2501 N. Harwood, Ste. 1800
Dallas, TX 75201
(214) 954-6800 Telephone
(214) 954-6850 Facsimile
Email: mchevallier@mcsllaw.com
Email: jrea@mcsllaw.com

and

Martin T. Fletcher, MD Bar No. 07608
Stephen F. Fruin, MD Bar No. 08456
Thomas J. Francella, Jr., DE Bar. No. 03835
Whiteford Taylor & Preston L.L.P.
Seven Saint Paul Street
Baltimore, MD 21202
(410) 347-8700 Telephone
(410) 752-7092 Facsimile
Email: mfletcher@wtplaw.com
Email: sfruin@wtplaw.com
Email: tfrancella@wtplaw.com

Proposed Attorneys for Sedgebrook, Inc.

CERTIFICATE OF SERVICE

I certify that on the 18th day of June, 2010, a copy of the foregoing was sent by electronic mail or First Class U.S. Mail, postage prepaid, on all parties on the attached service list.

/s/J. Mark Chevallier _____

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724087

Alpha Baking Company
36230 Treasury Center
Chicago, IL 60694

Architerra
239 US Hwy 45
Indian Creek, IL 60061

Becker Electrical Group Inc.
4210 43rd Avenue
Kenosha, WI 53144

Direct Supply Systems Inc.
PO Box 88201
Milwaukee, WI 53288-0201

Get Fresh Produce
1441 Brewer Creek Blvd
Bartlett, IL 60103

Gulf South Medical Supply
Attn Melanie Brewer
4345 South Point Blvd
Jacksonville, FL 32216

Healthcare Cosmetology Services Inc
PO Box 850243
Braintree, MA 02185

Hershey Creamery Company
301 S. Cameron Street
PO Box 1821
Harrisburg, PA 17105-1821

IKON Financial Services
Attn Donna Tanner Spec Assets Dept
PO Box 6338
Macon, GA 31208-6338

Koeckritz International, Inc.
1400 Hicks Road
Rolling Meadows, IL 60008

Lencioni Wholesale Meats Inc.
1000 Brown Street
Wauconda, IL 60084

Linda Roberts & Associates Inc.
104 East Roosevelt Rd. Suite 201
Wheaton, IL 60187

Phase 2 Services
143 Briarwood North
Oak Brook, IL 60523

Richard H. Moche [Email]
Mintz, Levin, Cohn, Ferris, Glovsky
and Popeo P.C.
1 Financial Center
Boston, MA 02111-2657

Sovereign Bank
Attn Brian Moran
3 Friends Lane, 2nd Floor
Newtown, PA 18940

Sun Office Products
15508 E. 19th Avenue
Aurora, CO 80011

Supreme Lobster
200 E. North Ave
Villa Park, IL 60181-1221

Sysco Food Services - Chicago
PO Box 5037
Des Plaines, IL 60017-5037

Universal Fleetcard
PO Box 70997
Charlotte, NC 28272-0997

U.S. Bank National Association
Corporate Trust Services [Email]
Attn James E. Murphy
100 Wall Street
NY, NY 10005

Vigil Health Solutions
2102-4464 Markham St.
Victoria, BC V8Z 7X8
Canada

Waste Management
PO Box 4648
Carol Stream, IL 60197-4648

William W. Kannel [Email]
Mintz, Levin, Cohn, Ferris, Glovsky
and Popeo, P.C.
1 Financial Center
Boston, MA 02111-2657

Sedgebrook, Inc.
701 Maiden Choice Lane
Baltimore, MD 21228

Office of the U. S. Trustee [ECF mail]
1100 Commerce Street Rm 976
Dallas, TX 75242

Office of the Attorney General
c/o Cara Smith, Esq. [Email]
100 West Randolph St.
Chicago, IL 60601

Illinois Department of Public Health
c/o Marc Gibbs [Email]
535 W. Jefferson St.
Springfield, IL 62761

Vincent P. Slusher
DLA Piper LLP (US)
1717 Main Street, Suite 4600
Dallas, Texas 75201

Thomas R. Califano/Jeremy R. Johnson
DLA Piper LLP (US)
1251 Avenue of the Americas
New York, NY 10020-1104

Erickson Retirement Communities, LLC
701 Maiden Choice Lane
Catonsville, MD 21228

Fifth Third Bank As Agent
424 Church St., Suite 500
Nashville, TN 37219

Wells Fargo, Trustee
9062 Old Annapolis Road
Columbia, MD 21045