

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

In re:) Chapter 11
)
TWG CAPITAL, INC.,) Case No. 12-11019-BHL-11
)
Debtor.)

**NOTICE OF MOTION FOR APPROVAL OF COMPROMISE,
OBJECTION DEADLINE AND HEARING**

A Motion For Approval Of Compromise With Imagine International Reinsurance Limited And The Lion 2004 Receivables Trust Pursuant To Rule 9019 ("Motion") [Docket No. 295] was filed on July 23, 2013 by TWG Capital, Inc., the debtor and debtor-in-possession in the above-captioned chapter 11 case ("Debtor"). A brief summary of the Motion is as follows:

1. The Debtor, Imagine International Reinsurance Limited ("Imagine"), and The Lion 2004 Receivables Trust ("Lion Trust") are parties to a Settlement Agreement dated November 20, 2012 (the "Settlement Agreement"), whereby the parties agreed, in relevant part, that the Debtor would convey, transfer, assign and deliver the Materials (as defined in paragraph 2 of the Settlement Agreement), including the Policytracker database, to Lion Trust for the sum of \$60,000 (the "Settlement Payment").
2. As of the date of the Motion, \$30,000 of the Settlement Payment remains due to the Debtor (the "Remaining Payment"). Lion Trust and Imagine have refused to pay the Remaining Payment due to a dispute between the parties as to whether the Policytracker database has been delivered in a satisfactory form.
3. The Debtor seeks approval of a compromise and settlement by and between the Debtor, Lion Trust and Imagine whereby Lion Trust and/or Imagine will pay \$25,000 in full and complete settlement of the Remaining Payment, which shall be payable in two installments: (i) \$15,000 will be paid to the Debtor immediately upon execution of the Amendment to the Settlement Agreement ("Amendment") by all parties thereto, and (ii) \$10,000 (the "Escrow Payment") will be paid into an escrow account (the "Escrow Account") on the Execution Date
4. The Escrow Payment will be released from the Escrow Account on or before September 30, 2013, provided that (i) the Court enters an order approving the Motion, and such order becomes a final, nonappealable order, and (ii) the "Access Agreement," substantially in the form of Exhibit A to the Amendment, is executed by the required, non-Debtor parties.

NOTICE IS HEREBY GIVEN that any objection to the proposed compromise or the relief requested in the Motion must be filed in writing in accordance with Local Rule S.D. Ind. B-9013-1 with the Clerk's Office and served on the undersigned attorney no later than **August 13, 2013**. Those not required or not permitted to file electronically must deliver any objection by U.S. mail, courier, overnight/express mail, or in person at:

Clerk, U.S. Bankruptcy Court
116 U.S. Courthouse
46 E. Ohio Street
Indianapolis, IN 46204

The objecting party must ensure delivery of the objection to the party filing the Motion. **If an objection is NOT timely filed, the requested relief may be granted.**

If any objections are timely filed, the Court will hold a hearing on the Motion on:

Date: September 4, 2013
Time: 9:30 a.m. EDT
Place: 46 E. Ohio Street, Room 310, Indianapolis, Indiana 46204

The dial-in telephone number for interested parties to participate in the hearing by conference call is 1-888-399-7768; passcode 787195, followed by the pound ("#") key.

Motions for continuances must be filed as soon as the cause for continuance or delay is discovered by the party requesting the continuance and no later than seven (7) days before the date of the hearing. Motions for continuances filed less than seven (7) days before the hearing date will be granted **only** upon a showing of good cause. Every motion for continuance shall denominate whether opposing counsel objects to the continuance or what efforts were made to contact opposing counsel regarding such request for continuance.

A copy of the Motion is available on the Court's PACER site at <http://pacer.insb.uscourts.gov>, or on the noticing agent's website at www.bmcgroup.com/twgcapital, or by contacting Kayla D. Britton, counsel to the Debtor, at kayla.britton@faegrebd.com or via telephone 317-237-1155.

Dated: July 23, 2013

/s/ Kayla D. Britton

Jay Jaffe (#5037-98)
Wendy W. Ponader (#14633-49)
Kayla D. Britton (#29177-06)
600 E. 96th Street, Suite 600
Indianapolis, IN 46240
Telephone: (317) 569-9600
Facsimile: (317) 569-4800
jay.jaffe@faegrebd.com
wendy.ponader@faegrebd.com
kayla.britton@faegrebd.com

Counsel for the Debtor and Debtor-in-Possession