

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

In re:	Chapter 11
MIG, LLC and ITC Cellular, LLC, ¹	Case No. 14-11605 (KG)
Debtors.	(Jointly Administered)
MIG, LLC and ITC Cellular, LLC,	
Plaintiffs,	Adv. No. 15-51115 (KG)
v.	
SHENTON PARK COMPANY, INC.,	
Defendant.	

**NOTICE OF AGENDA FOR HEARING ON
MATTERS SCHEDULED FOR DECEMBER 3, 2015 AT 10:00 A.M.
Location: Before the Honorable Kevin Gross, 6th Floor, Courtroom No. 3**

UNCONTESTED MATTERS WITH CNOS:

1. Motion for Order Authorizing the Debtors to File Under Seal Portions of (I) Debtors' Motion for (I) an Order Enforcing the Automatic Pursuant to 11 U.S.C. Section 362; and (II) a Temporary Restraining Order and Preliminary Injunction Pursuant to 11 U.S.C. Section 105(a), Fed.R.Bankr.P. 7001(7) and 7065, and Fed.R.Civ.P. 65; and (II) Declaration of Natalia Alexeeva in Support [Adv. Docket No. 7, Filed August 19, 2015]

Responses Received: None.

Related Documents:

- A. [SEALED²] Motion for (I) an Order Enforcing the Automatic Stay or, in the Alternative, Extending the Automatic Stay Pursuant to 11 U.S.C. Section 362; and (II) a Temporary Restraining Order and Preliminary Injunction Pursuant to 11 U.S.C. Section 105(a), Fed.R.Bankr.P. 7001(7) and 7065, and Fed.R.Civ.P. 65 Filed by ITC Cellular, LLC, MIG, LLC [Adv. Docket No. 3, Filed August 19, 2015]
- B. [SEALED] Declaration of Natalia Alexeeva in Support of the Debtors' Motion for (I) an Order Enforcing the

¹ The Debtors in these chapter 11 cases, along with the last four (4) digits of each Debtor's federal tax identification number, are: MIG, LLC (5301) and ITC Cellular, LLC (4611).

² Documents filed under seal will be included in the hearing binders with this Agenda.

Automatic Stay or, in the Alternative, Extending the Automatic Stay Pursuant to 11 U.S.C. Section 362; and (II) a Temporary Restraining Order and Preliminary Injunction Pursuant to 11 U.S.C. Section 105(a), Fed.R.Bankr.P. 7001(7) and 7065, and Fed.R.Civ.P. 65 [Adv. Docket No. 5, Filed August 19, 2015]

- C. Certification of No Objection to Motion [Adv. Docket No. 60, Filed December 1, 2015]

Status: A certificate of no objection has been filed and counsel respectfully requests entry of the proposed form of order at the Court's convenience.

- 2. Motion to File Under Seal Its Brief in Support of Its Motion for Summary Judgment Filed by Shenton Park Company, Inc. [Adv. Docket No. 43, Filed November 5, 2015]

Responses Received: None.

Related Documents:

- A. [SEALED] Brief of Shenton Park Company, Inc. Filed by Shenton Park Company, Inc. [Adv. Docket No. 45, Filed November 5, 2015]
- B. Certification of No Objection to Motion [Adv. Docket No. 59, Filed December 1, 2015]

Status: A certificate of no objection has been filed and counsel respectfully requests entry of the proposed form of order at the Court's convenience.

- 3. Debtors' Motion for an Order Authorizing the Debtors to File Under Seal Joint Memorandum of Points and Authorities of the Debtors and the Indenture Trustee in Support of Debtors' Request for an Order (A) Enforcing the Automatic Stay, or, in the Alternative, Extending the Automatic Stay and (B) Enjoining the Action by Shenton Park Company, Inc. to Have a Liquidator Appointed Over Caucuscom Ventures L.P. [Adv. Docket No. 47, Filed November 5, 2015]

Response Deadline: November 25, 2015

Responses Received: None.

Related Documents:

- A. [SEALED] Joint Memorandum of Points and Authorities of the Debtors and the Indenture Trustee in Support of Debtors' Request for an Order (A) Enforcing the Automatic Stay, or, in the Alternative, Extending the Automatic Stay and (B) Enjoining the Action by Shenton Park Company, Inc. to Have a Liquidator Appointed Over Caucuscom

Ventures L.P. Filed by MIG, LLC. [Adv. Docket No. 46, Filed November 5, 2015]

- B. Certification of No Objection to Motion [Adv. Docket No. 61, Filed December 1, 2015]

Status: A certificate of no objection has been filed and counsel respectfully requests entry of the proposed form of order at the Court's convenience.

- 4. Debtors' Motion For Order Authorizing the Debtors to File Under Seal Joint Response of the Debtors and the Indenture Trustee in Support of the Request for Ruling That No ITC Cellular Change of Control Has Occurred Filed by Bank of New York Mellon as indenture trustee, ITC Cellular, LLC, MIG, LLC [Adv. Docket No. 54, Filed November 24, 2015]

Responses Received: None.

Related Documents:

- A. [SEALED] Joint Response of the Debtors and the Indenture Trustee in Support of the Request for Ruling That No ITC Cellular Change of Control Has Occurred Filed by Bank of New York Mellon as indenture trustee, ITC Cellular, LLC, MIG, LLC [Adv. Docket No. 50, Filed November 24, 2015]
- B. Certification of No Objection to Motion [Adv. Docket No. 62, Filed December 1, 2015]

Status: A certificate of no objection has been filed and counsel respectfully requests entry of the proposed form of order at the Court's convenience.

UNCONTESTED MATTER GOING FORWARD:

- 5. Shenton Park Company Inc.'s Motion for an Order Authorizing Shenton to File Under Seal Its Answering Brief in Support of Its Motion for Summary Judgment Filed by Shenton Park Company, Inc. [Adv. Docket No. 51, Filed November 24, 2015]

Responses Received: None.

Related Documents:

- A. [SEALED] Answering Brief of Shenton Park Company, Inc. [Adv. Docket No. 52, Filed November 24, 2015]
- B. Shenton Park Company Inc.'s Motion to Shorten Notice with respect to the Motion for an Order Authorizing Shenton to File Under Seal Its Answering Brief in Support

of Its Motion for Summary Judgment Filed by Shenton Park Company, Inc. [Adv. Docket No. 53, Filed November 24, 2015]

Status: This matter will be going forward as uncontested.

CONTESTED MATTER GOING FORWARD:

6. Determination if an “ITC Cellular Change of Control” has occurred with respect to Adv. Proc. No. 15-51115, *MIG, LLC and ITC Cellular, LLC v. Shenton Park Company, Inc.*

Related Documents:

- A. Complaint for Declaratory and Injunctive Relief by MIG, LLC and ITC Cellular, LLC against Shenton Park Company, Inc. [Adv. Docket No. 1, Filed August 19, 2015]
- B. [SEALED] Motion for (I) an Order Enforcing the Automatic Stay or, in the Alternative, Extending the Automatic Stay Pursuant to 11 U.S.C. Section 362; and (II) a Temporary Restraining Order and Preliminary Injunction Pursuant to 11 U.S.C. Section 105(a), Fed.R.Bankr.P. 7001(7) and 7065, and Fed.R.Civ.P. 65 Filed by ITC Cellular, LLC, MIG, LLC [Adv. Docket No. 3, Filed August 19, 2015] (the “TRO Motion”)
- C. [SEALED] Declaration of Natalia Alexeeva in Support of the Debtors' Motion for (I) an Order Enforcing the Automatic Stay or, in the Alternative, Extending the Automatic Stay Pursuant to 11 U.S.C. Section 362; and (II) a Temporary Restraining Order and Preliminary Injunction Pursuant to 11 U.S.C. Section 105(a), Fed.R.Bankr.P. 7001(7) and 7065, and Fed.R.Civ.P. 65 [Adv. Docket No. 5, Filed August 19, 2015]
- D. Motion of The Bank of New York Mellon for an Order, Pursuant to Fed.R.Bankr.P. 2004 and Local Rule 2004-1, Authorizing Discovery From Shenton Park Company Inc. [Docket No. 472, Filed August 19, 2015]
- E. Objection to Motion of The Bank of New York Mellon for an Order, Pursuant to Fed.R.Bankr.P. 2004 and Local Rule 2004-1, Authorizing Discovery From Shenton Park Company Inc. Filed by Shenton Park Company, Inc. [Docket No. 478, Filed August 26, 2015]

- F. Answer, Affirmative Defenses, Counterclaims and Third Party Complaint of Shenton Park Company, Inc. [Adv. Docket No. 15, Filed August 26, 2015]
- G. Order Approving Stipulation Regarding Scheduling of Discovery and Hearing on (1) Debtors' Motion for (I)an Order Enforcing the Automatic Stay or in the Alternative Extending the Automatic Stay and (II) a Temporary Restraining Order and Preliminary Injunction and (2) Counterclaim of Shenton Park Company, Inc. [Adv. Docket No. 29, Filed September 25, 2015]
- H. Motion For Summary Judgment Filed by Shenton Park Company, Inc. [Adv. Docket No. 44, Filed November 5, 2015]
- I. [SEALED] Brief of Shenton Park Company, Inc. Filed by Shenton Park Company, Inc. [Adv. Docket No. 45, Filed November 5, 2015]
- J. [SEALED] Joint Memorandum of Points and Authorities of the Debtors and the Indenture Trustee in Support of Debtors' Request for an Order (A) Enforcing the Automatic Stay, or, in the Alternative, Extending the Automatic Stay and (B) Enjoining the Action by Shenton Park Company, Inc. to Have a Liquidator Appointed Over Caucuscom Ventures L.P. Filed by MIG, LLC. [Adv. Docket No. 46, Filed November 5, 2015]
- K. [SEALED] Joint Response of the Debtors and the Indenture Trustee in Support of the Request for Ruling That No ITC Cellular Change of Control Has Occurred Filed by Bank of New York Mellon as indenture trustee, ITC Cellular, LLC, MIG, LLC [Adv. Docket No. 50, Filed November 24, 2015]
- L. [SEALED] Answering Brief of Shenton Park Company, Inc. [Adv. Docket No. 52, Filed November 24, 2015]
- M. Certification of Counsel Requesting Entry of Order Approving Stipulation Regarding Issues Remaining in Connection with the Hearing on (1) Debtors Motion for (I) and Order Enforcing the Automatic Stay or, in the Alternative, Extending the Automatic Stay Pursuant to 11 U.S.C. Section 362; and (II) a Temporary Restraining Order and Preliminary Injunction Pursuant to 11 U.S.C. Section 105(a), Fed. R. Bankr. P. 7001(7) and 7065, and Fed. R. Civ. P. 65; and (2) Counterclaims of Shenton Park

Company, Inc. [Adv. Docket No. 58, Filed November 30, 2015]

Status: This matter will be going forward. The parties have agreed to limit the issues before the Court to the question as to whether a change of control (an “ITC Cellular Change of Control”) occurred under Section 8.1 of the Second Amended and Restated Limited Liability Company Agreement of International Telcell Cellular, LLC, dated January 15, 2009, as a result of the expiration of the fixed term of the Caucuscom Ventures L.P. partnership on April 15, 2014. Counsel has also filed a certification of counsel submitting a proposed form of order on the remaining issues in connection with the hearing on the TRO Motion for the Court’s consideration.

Dated: December 1, 2015

GREENBERG TRAURIG, LLP

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SEC
2002 Notice Parties
Counsel to BONY Mellon
Counsel to Indenture Trustee to the MIG Notes
Counsel to the Official Committee of Unsecured Creditors
Counsel to Shenton Park Company Inc.