

COLE SCHOTZ P.C.

Court Plaza North
25 Main Street
P.O. Box 800
Hackensack, New Jersey 07602-0800
(201) 489-3000
(201) 489-1536 Facsimile
Warren A. Usatine, Esq.
wusatine@coleschotz.com
Felice R. Yudkin, Esq.
fyudkin@coleschotz.com
Rebecca W. Hollander, Esq.
rhollander@coleschotz.com

*Proposed Counsel to the Debtor
and Debtor in Possession*

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re

CONGOLEUM CORPORATION,

Debtor.¹

Chapter 11

Case No. 20-18488 (MBK)

**DEBTOR’S APPLICATION FOR
EXPEDITED CONSIDERATION OF FIRST DAY MATTERS**

Congoleum Corporation, as debtor and debtor in possession in the above-captioned chapter 11 case (the “**Debtor**”), by and through their undersigned proposed counsel, submits this application for expedited consideration of first day matters pursuant to Rule 9013-5 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey and respectfully request that a hearing on the following applications and motions be provided on an expedited basis:

¹ The last four digits of the Debtor’s federal tax identification number are 8678. The Debtor’s corporate headquarters is located at 3500 Quakerbridge Road, Mercerville, New Jersey 08619.

1. Debtor's Motion Pursuant to 11 U.S.C. §§ 105 and 361 for Interim and Final Orders (I) Approving Cash Management System and (II) Authorizing the Debtor to Continue Using Existing Bank Accounts and Business Forms [Docket No. 3]
2. Debtor's Motion Pursuant to 11 U.S.C. §§ 105(a), 363, and 507(a) for Interim and Final Authority to (I) Pay Certain Pre-Petition Wages and Reimbursable Employee Expenses, (II) Pay and Honor Employee Medical and Other Benefits, and (III) Continue Employee Benefits Programs [Docket No. 6]
3. Debtor's Motion Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 503(b) for Interim And final Authority to (I) Maintain, Renew, and Continue Its Insurance Policies and Programs and (II) Honor All Insurance Obligations [Docket No. 7]
4. Debtor's Motion Pursuant to 11 U.S.C. §§ 105(a), 363(b), 507(a), and 541 for Entry of an Order Authorizing, But Not Directing, the Debtor to Pay Certain Pre-Petition Taxes and Fees [Docket No. 8]
5. Debtor's Motion for Entry of Interim and Final Orders Authorizing the Debtor to Pay Certain Customs and Regulatory Charges [Docket No. 9]
6. Debtor's Motion Pursuant to 11 U.S.C. §§ 105(a) and 366 for Interim and Final Orders (I) Approving Debtor's Proposed Form of Adequate Assurance of Payment to Utility Providers, (II) Establishing Procedures for Determining Adequate Assurance of Payment for Future Utility Services, and (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Service [Docket No. 10]
7. Debtor's Motion for Entry of Interim and Final Order Authorizing the Debtor to Pay Certain Pre-Petition Claims of Critical Vendors, Shipper and Miscellaneous Lien Claimants [Docket No. 11]
8. Debtor's Motion Pursuant to 11 U.S.C. §§ 105(a) and 363(b) for Interim and Final Authority to Maintain and Administer Pre-Petition Customer Programs and Pay and Honor Related Obligations [Docket No. 12]
9. Debtor's Motion Pursuant to 11 U.S.C. §§ 105(a) and 521(a)(1)(b) and Fed. R. Bankr. P. 1007(c) for Entry of an Order Extending Time to File Its Schedules of Assets and Liabilities and Statements of Financial Affairs [Docket No. 13]
10. Debtor's Application Pursuant to 28 U.S.C. § 156(c) and 11 U.S.C. § 105(a) for Entry of an Order Authorizing the Appointment of Prime Clerk LLC as Claims and Noticing Agent Nunc Pro Tunc to the Petition Date [Docket No. 14]
11. Debtor's Motion for an Interim and Final Order: (I) Authorizing the Debtor to Obtain Post-Petition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 364(c) and 364(e); (II) Authorizing Use of Cash Collateral; (III) Scheduling a Final Hearing Pursuant to Fed. R. Bankr. P. 4001; and (IV) Granting Other Related Relief [Docket No. 17]

WHEREFORE the Debtor respectfully requests entry of an Order granting the relief requested herein and such other and further relief as the Court may deem just and appropriate.

Dated: July 13, 2020

Respectfully submitted,

COLE SCHOTZ P.C.
*Proposed Counsel to the Debtor
and Debtor in Possession*

/s/ Warren A. Usatine

Warren A. Usatine
Felice R. Yudkin
Rebecca W. Hollander
Court Plaza North
25 Main Street
Hackensack, NJ 07601
Telephone: (201) 489-3000
Facsimile: (201) 489-1536
Email: wusatine@coleschotz.com
fyudkin@coleschotz.com
rhollander@coleschotz.com

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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25 Main Street
P.O. Box 800
Hackensack, New Jersey 07602-0800
Warren A. Usatine, Esq.
wusatine@coleschotz.com
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Rebecca W. Hollander, Esq.
rhollander@coleschotz.com
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*Proposed Counsel to the Debtor
and Debtor in Possession*

In re

CONGOLEUM CORPORATION,

Debtor.¹

Chapter 11
Case No. 20-18488 (MBK)

Hearing Date and Time:
_____, 2020, at __: __.m. (EST)

**ORDER REGARDING DEBTOR'S APPLICATION FOR
EXPEDITED CONSIDERATION OF FIRST DAY MATTERS**

The relief set forth on the following pages, numbered two (2) through five (5), is hereby
ORDERED.

¹ The last four digits of the Debtor's federal tax identification number are 8678. The Debtor's corporate headquarters is located at 3500 Quakerbridge Road, Mercerville, New Jersey 08619.

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Debtors: CONGOLEUM CORPORATION
Case No. 20-18488 (MBK)
Caption of Order: ORDER REGARDING DEBTOR'S APPLICATION FOR EXPEDITED
CONSIDERATION OF FIRST DAY MATTERS

Upon the application (the "**Application**") of Congoleum Corporation as debtor and debtor in possession in the above-captioned chapter 11 case, pursuant to Rule 9013-5 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey, for expedited consideration of first day matters, and for good cause shown; and the Court having jurisdiction to decide the Application and the relief requested therein in accordance with 28. U.S.C. §§ 157(a)-(b) and 1334(b); and consideration of the Application and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and upon the *Declaration of Christopher O'Connor in Support of Debtors' Chapter 11 Petition and First Day Pleadings*, filed contemporaneously with the Application; and the Court having found and determined that the relief sought in the Application and granted herein is necessary to avoid immediate and irreparable harm to the Debtor and their estate as contemplated by Bankruptcy Rule 6003, and is in the best interests of the Debtor, their estate and creditors, and all parties-in-interest; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Application is **GRANTED**.
2. The following applications and motions (collectively, the "**Motions**") are scheduled for telephonic hearing before the Honorable Michael B. Kaplan on the date(s) and time(s) set forth below:

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Debtors: CONGOLEUM CORPORATION
Case No. 20-18488 (MBK)
Caption of Order: ORDER REGARDING DEBTOR'S APPLICATION FOR EXPEDITED
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Motion		Hearing Date and Time
1.	Debtor's Motion Pursuant to 11 U.S.C. §§ 105 and 361 for Interim and Final Orders (I) Approving Cash Management System and (II) Authorizing the Debtor to Continue Using Existing Bank Accounts and Business Forms [Docket No. 3]	_____, 2020 at 10:00 a.m.
2.	Debtor's Motion Pursuant to 11 U.S.C. §§ 105(a), 363, and 507(a) for Interim and Final Authority to (I) Pay Certain Pre-Petition Wages and Reimbursable Employee Expenses, (II) Pay and Honor Employee Medical and Other Benefits, and (III) Continue Employee Benefits Programs [Docket No. 6]	_____, 2020 at 10:00 a.m.
3.	Debtor's Motion Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 503(b) for Interim And final Authority to (I) Maintain, Renew, and Continue Its Insurance Policies and Programs and (II) Honor All Insurance Obligations [Docket No. 7]	_____, 2020 at 10:00 a.m.
4.	Debtor's Motion Pursuant to 11 U.S.C. §§ 105(a), 363(b), 507(a), and 541 for Entry of an Order Authorizing, But Not Directing, the Debtor to Pay Certain Pre-Petition Taxes and Fees [Docket No. 8]	_____, 2020 at 10:00 a.m.
5.	Debtor's Motion for Entry of Interim and Final Orders Authorizing the Debtor to Pay Certain Customs and Regulatory Charges [Docket No. 9]	_____, 2020 at 10:00 a.m.
6.	Debtor's Motion Pursuant to 11 U.S.C. §§ 105(a) and 366 for Interim and Final Orders (I) Approving Debtor's Proposed Form of Adequate Assurance of Payment to Utility Providers, (II) Establishing Procedures for Determining Adequate Assurance of Payment for Future Utility Services, and (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Service [Docket No. 10]	_____, 2020 at 10:00 a.m.

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Motion		Hearing Date and Time
7.	Debtor's Motion for Entry of Interim and Final Order Authorizing the Debtor to Pay Certain Pre-Petition Claims of Critical Vendors, Shipper and Miscellaneous Lien Claimants [Docket No. 11]	_____, 2020 at 10:00 a.m.
8.	Debtor's Motion Pursuant to 11 U.S.C. §§ 105(a) and 363(b) for Interim and Final Authority to Maintain and Administer Pre-Petition Customer Programs and Pay and Honor Related Obligations [Docket No. 12]	_____, 2020 at 10:00 a.m.
9.	Debtor's Motion Pursuant to 11 U.S.C. §§ 105(a) and 521(a)(1)(b) and Fed. R. Bankr. P. 1007(c) for Entry of an Order Extending Time to File Its Schedules of Assets and Liabilities and Statements of Financial Affairs [Docket No. 13]	_____, 2020 at 10:00 a.m.
10.	Debtor's Application Pursuant to 28 U.S.C. § 156(c) and 11 U.S.C. § 105(a) for Entry of an Order Authorizing the Appointment of Prime Clerk LLC as Claims and Noticing Agent Nunc Pro Tunc to the Petition Date [Docket No. 14]	_____, 2020 at 10:00 a.m.
11.	Debtor's Motion for an Interim and Final Order: (I) Authorizing the Debtor to Obtain Post-Petition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 364(c) and 364(e); (II) Authorizing Use of Cash Collateral; (III) Scheduling a Final Hearing Pursuant to Fed. R. Bankr. P. 4001; and (IV) Granting Other Related Relief [Docket No. 17]	_____, 2020 at 10:00 a.m.

3. Parties may consult the website for the United States Bankruptcy Court for the District of New Jersey, <http://www.njb.uscourts.gov/>, for instructions on how to participate in the Hearing. Parties wishing to participate in the Hearing must contact CourtSolutions to schedule an appearance no less than twenty-four hours before the Hearing.

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Debtors: CONGOLEUM CORPORATION
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4. A true copy of this Order shall be served on all required parties pursuant to D.N.J. LBR 9013-5(f).

5. Objections and/or responses to the Motions, if any, may be made at the hearing pursuant to D.N.J. LBR 9013-5(d).

6. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and/or enforcement of this Order.