

AKIN GUMP STRAUSS HAUER & FELD LLP
One Bryant Park
New York, NY 10036
Telephone: (212) 872-1000
David H. Botter

AKIN GUMP STRAUSS HAUER & FELD LLP
1700 Pacific Avenue, Suite 4100
Dallas, Texas 75201
Telephone: (214) 969-2800
Sarah Link Schultz (*pro hac vice* admission pending)
Travis A. McRoberts (*pro hac vice* admission pending)

Proposed Counsel to Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	
)	
)	Chapter 11
)	
INTERNATIONAL SHIPHOLDING CORPORATION, <i>et al.</i> , ¹)	Case No. 16-12220 (SMB)
)	
Debtors.)	Joint Administration Requested
)	

PROPOSED AGENDA FOR FIRST DAY HEARING

Time and Date of Hearing: August 3, 2016 at 10:00 a.m. (Prevailing Eastern Time) (the “First Day Hearing”)

Location of Hearing: Honorable Stuart M. Bernstein
United States Bankruptcy Court
Southern District of New York
Alexander Custom House
One Bowling Green, Courtroom 723
New York, New York 10004-1408

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: International Shipholding Corporation (9662); Enterprise Ship Co. (9059); Sulphur Carriers, Inc. (8965); Central Gulf Lines, Inc. (8979); Coastal Carriers, Inc. (6278); Waterman Steamship Corporation (0640); N.W. Johnsen & Co., Inc. (8006); LMS Shipmanagement, Inc. (0660); U.S. United Ocean Services, LLC (1160); Mary Ann Hudson, LLC (8478); Sheila McDevitt, LLC (8380); Tower LLC (6755); Frascati Shops, Inc. (7875); Gulf South Shipping PTE LTD (8628); LCI Shipholdings, Inc. (8094); Dry Bulk Australia LTD (5383); Dry Bulk Americas LTD (6494); and Marco Shipping Company PTE LTD (4570). The service address for each of the above Debtors is 601 Poydras Street, Pan American Building, Suite 1850, New Orleans, Louisiana 70130.

Copies of Motions A copy of each pleading can be viewed (a) for a fee on the Court's website at www.ecf.uscourts.gov, and (b) free of charge on the website of the Debtors' proposed claims and noticing agent, Prime Clerk, at <https://cases.primeclerk.com/ish>.

I. INTRODUCTION

- A. First Day Declaration. Declaration of Erik L. Johnsen, President and Chief Executive Officer, Pursuant to Local Bankruptcy Rule 1007-2 and in Support of First Day Filings [ECF No. 7]

II. MOTIONS TO BE HEARD AT THE FIRST DAY HEARING

- A. Joint Administration Motion. Debtors' Motion for Entry of an Order (I) Directing Joint Administration of Chapter 11 Cases and; (II) Authorizing the Debtors to File Consolidated Monthly Operating Reports [ECF No. 2]
- B. Prime Clerk Application. Debtors' Application for Appointment of Prime Clerk LLC as Claims and Noticing Agent [ECF No. 6]
- C. Trade Restrictions Motion. Debtors' Motion for the Entry of Interim and Final Orders Establishing Notification and Hearing Procedures for Transfers of, or Claims of Worthlessness with Respect to, Certain Equity Securities [ECF No. 5]
- D. Automatic Stay Motion. Debtors' Motion for Entry of an Order Enforcing and Restating the Automatic Stay, *Ipso Facto*, and Non-Discrimination Provisions [ECF No. 18]
- E. Wages Motion. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Pay Pre-Petition Wages, Other Compensation, and Reimbursable Expenses, (B) Continue Employee Benefit Programs, and (C) Pay Director Fees and Expenses; and (II) Authorizing Financial Institutions to Honor and Process All Checks and Electronic Payment Requests Related to Such Obligations [ECF No. 10]
- F. Critical Vendors Motion. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Payment of Certain Critical Trade Claims in the Ordinary Course of Business; and (II) Authorizing Financial Institutions to Honor All Related Checks and Electronic Payment Requests [ECF No. 14]
- G. Lien Claimants Motion. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Pre-Petition Claims (A) of Shippers and Warehousemen, (B) of Miscellaneous Lien Claimants, (C) Arising Under Bankruptcy Code Sections 503(b)(9) and (b)(1), and (D) Incurred in Connection with Post-Petition Delivery of Goods and Services; and (II) Authorizing Financial

Institutions to Honor and Process Checks and Electronic Payment Requests Related to the Foregoing Obligations [ECF No. 15]

- H. Cash Management Motion. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Continue in Ordinary Course (A) Using Existing Cash Management System, Bank Accounts, and Business Forms and (B) Performing Intercompany Transactions; (II) Authorizing Debtors' Banks to Honor All Related Payment Requests; (III) Waiving, or Extending the Time to Comply with, Investment Guidelines of Bankruptcy Code Section 345(b) [ECF No. 16]
- I. DIP Financing Motion. Debtors' Motion for Entry of Interim and Final Orders (1) Authorizing Debtors to (A) Obtain Postpetition Financing, (B) Use Cash Collateral, and (C) Grant Certain Protections to Prepetition Lenders, (2) Scheduling a Final Hearing, and (3) Granting Certain Related Relief [ECF No. 17]
1. *Declaration in Support.* Declaration of Laurence H. Gurley in Support of Entry of Debtors' Motion for Entry of Interim and Final Orders (1) Authorizing Debtors to (A) Obtain Postpetition Financing, (B) Use Cash Collateral, and (C) Grant Certain Protections to Prepetition Secured Lenders, (2) Scheduling a Final Hearing, and (3) Granting Certain Related Relief [ECF No. 23]

III. MOTIONS TO BE HEARD ON AUGUST 9, 2016 AT 10:00 A.M. (PREVAILING EASTERN TIME)²

- A. Creditors Matrix Motion. Debtors' Motion for Entry of an Order (I) Authorizing Debtors to Prepare and Maintain a Consolidated List of Creditors in Lieu of a Formatted Mailing Matrix; (II) Authorizing Debtors to File a Consolidated List of Top Thirty Unsecured Creditors; and (III) Waiving the Requirement to File a List of Equity Security Holders [ECF No. 4]
- B. SOFA and Schedules Extension Motion. Debtors' Motion for Entry of an Order Granting an Extension of Time to File (I) Schedules and Statements; and (II) Rule 2015.3 Financial Reports [ECF No. 8]
- C. Utilities Motion. Debtors' Motion for Entry of Interim and Final Orders (I) Determining that Utility Providers Have Been Provided with Adequate Assurance of Payment; (II) Approving the Proposed Adequate Assurance Procedures; (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Services; and (IV) Determining That Debtors Are Not Required to Provide Any Additional Assurance [ECF No. 11]

² In addition, the *Debtors' Motion for Entry of an Order Establishing Certain Notice, Case Management, and Administrative Procedures* [ECF No. 9] will be served on parties in interest and heard at the next omnibus hearing.

- D. Insurance Motion. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Maintain Existing Insurance Programs and (B) Pay All Obligations in Respect Thereof; and (II) Authorizing Financial Institutions to Honor and Process All Related Checks and Electronic Payment Requests [ECF No. 12]
- E. Tax Motion. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing, But Not Directing, Debtors to Pay Taxes and Fees; and (II) Authorizing Financial Institutions to Honor All Related Checks and Electronic Payment Requests [ECF No. 13]

Dated: New York, New York
August 1, 2016

AKIN GUMP STRAUSS HAUER & FELD LLP

By: /s/ David H. Botter

David H. Botter
One Bryant Park
New York, NY 10036
Telephone: (212) 872-1000
Facsimile: (212) 872-1002

Sarah Link Schultz (*pro hac vice* admission pending)
Travis A. McRoberts (*pro hac vice* admission pending)
1700 Pacific Avenue, Suite 4100
Dallas, Texas 75201
Telephone: (214) 969-2800
Facsimile: (214) 969-4343

Proposed Counsel to Debtors and Debtors in Possession