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*Proposed Attorneys for the Debtors and
Debtors in Possession*

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

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In re:	: Chapter 11
	: :
LEGEND PARENT, INC., <i>et al.</i> ,	: Case No. 14-10701 (REG)
	: :
Debtors. ¹	: Joint Administration Requested
	: :
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PROPOSED AGENDA FOR FIRST DAY HEARING

Time and Date of Hearing: March 20, 2014 at 2:30 pm (Prevailing Eastern Time)

Location of Hearing: The Honorable Robert E. Gerber, Bankruptcy Judge
United States Bankruptcy Court for the
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green, Courtroom No. 523
New York, New York 10004

Copies of Motions: A copy of each pleading can be viewed on the Court’s website at
www.ecf.uscourts.gov and the website of the Debtors’ proposed
notice and claims agent, Prime Clerk LLC, at
<http://cases.primeclerk.com/mmodal>

¹ The Debtors in these cases along with the last four digits of their federal tax identification number are: Legend Parent, Inc. (8624); MModal Holdings, Inc. (7380); MModal Inc. (6666); Multimodal Technologies, LLC (2076); MModal CB Inc. (5948); Poiesis Informatics, Inc. (0978); MModal MQ Inc. (1298); MModal Systems & Services Inc. (3443); Mirrus Systems Inc. (5862); MedQuist of Delaware, Inc. (3311); MModal IP LLC (0512); MModal Services, Ltd. (0433); MedQuist CM LLC (5362); and All Type Medical Transcription Services, Inc. (0722). The Debtors’ corporate headquarters is located at 5000 Meridian Boulevard, Suite 200, Franklin, TN 37067.

I. Introduction

1. **First Day Declaration.** Declaration of David Woodworth in Accordance With Local Rule 1007-2 in Support of First Day Motions [Docket No. 3]
2. **Joint Administration.** Debtors' Motion for Order Directing Joint Administration of Related Chapter 11 Cases [Docket No. 2]

II. First Day Matters

A. Administrative and Procedural Motions

1. **Creditor Matrix Motion.** Debtors' Motion for Order Authorizing the Debtors to (I) Prepare a List of Creditors in Lieu of Submitting a Formatted Mailing Matrix, (II) File a Consolidated List of 30 Largest Unsecured Creditors and (III) Mail a Form of Notice to Creditors Notifying Them of Commencement of Chapter 11 Cases [Docket No. 4]
2. **503(b)(9) Motion.** Debtors' Motion for Order (I) Establishing Bar Date for Filing Requests for Payment of Administrative Expense Claims Arising Under Section 503(b)(9) of the Bankruptcy Code, (II) Approving Procedures for Filing Requests for Payment, and (III) Approving the Form, Manner, and Sufficiency of Notice Thereof [Docket No. 7]
3. **Case Management Motion.** Debtors' Motion for Authority to Limit Notice and to Establish Case Management Procedures [Docket No. 5]
4. **Schedules and Statements Motion.** Debtors' Motion for Order Extending the Time to File Schedules and Statements and Reports of Financial Information [Docket No. 6]
5. **Claims Agent Retention.** Debtors' Application for Appointment of Prime Clerk LLC as Claims and Noticing Agent [Docket No. 14]

B. Operational Motions

1. **Cash Management.** Debtors' Motion for Entry of Interim and Final Orders Approving (I) the Debtors' Continued Use of Their Cash Management System, (II) the Continuation of the Intercompany Transactions, (III) Administrative Expense Status for Postpetition Intercompany Claims, and (IV) the Debtors' Continued Use of Existing Bank Accounts, Checks, and Business Forms [Docket No. 10]
2. **Wages and Benefits.** Debtors' Motion for Interim and Final Orders Authorizing (I) the Payment Of Prepetition Wages and Salaries, (II) the

Payment and Honoring of Prepetition Employee Policies and Benefits, and
(III) the Continuation of Workers' Compensation Insurance Programs
[Docket No. 12]

3. **Insurance.** Debtors' Motion for Interim and Final Orders Authorizing the Debtors to (I) Maintain, Continue, and Renew Their Property, Casualty, Liability and Other Insurance Policies And Agreements, and (II) Honor All Obligations in Respect Thereof [Docket No. 13]
4. **Customer Programs.** Debtors' Motion for Entry of Interim and Final Orders Authorizing the Debtors to Perform and to Honor Certain Prepetition Customer Programs in the Ordinary Course of Business [Docket No. 11]
5. **Taxes.** Debtors' Motion for Entry of Interim and Final Orders Authorizing the Payment of Certain Prepetition Taxes [Docket No. 8]

C. Finance Motion

1. **Cash Collateral.** Debtors' Motion for Interim and Final Orders (I) Authorizing Debtors to Utilize Cash Collateral Pursuant to 11 U.S.C. § 363, (II) Granting Adequate Protection to Prepetition Secured Parties Pursuant to 11 U.S.C. §§ 361, 362, and 363, and (III) Scheduling Final Hearing Pursuant to Bankruptcy Rule 4001(b) [Docket No. 9]

Dated: New York, New York
March 20, 2014

DECHERT LLP

/s/ Shmuel Vasser

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