

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 11
NORTHSHORE MAINLAND SERVICES INC., <i>et al.</i> , ¹)	Case No. 15-11402 (KJC)
Debtors.)	(Jointly Administered)
)	Related Docket No. 359

**AMENDED² NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR HEARING ON AUGUST 17, 2015, AT 11:00 A.M. (EASTERN TIME)³**

**PLEASE NOTE THAT THE HEARING WILL BE
HELD AT THE FOLLOWING LOCATION:**

**824 N. MARKET STREET
5th FLOOR, COURTROOM NO. 5
WILMINGTON, DELAWARE**

CONTINUED MATTERS:

1. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors and Debtors in Possession to Obtain Postpetition Financing, (II) Granting Liens and Super-Priority Claims, (III) Authorizing Use of Cash Collateral, (IV) Granting Adequate Protection to Prepetition Secured Lenders, (V) Scheduling Hearing to Consider Entry of Final Order, and (VI) Granting Related Relief [Filed: 6/29/15] (Docket No. 9)

Original Response Deadline: July 27, 2015, at 5:00 p.m.

New Response Deadline: August 10, 2015, at 4:00 p.m.; extended by agreement to August 13, 2015, at 4:00 p.m. for the Official Committee of Unsecured Creditors

Responses Received:

- A. Limited Opposition of PDS Gaming-International, LLC to Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors and Debtors in

¹ The Debtors in these chapter 11 cases, along with the last four digits of the lead Debtor's federal tax identification number, are as follows: Northshore Mainland Services Inc. (9087); Baha Mar Enterprises Ltd.; Baha Mar Entertainment Ltd.; Baha Mar Land Holdings Ltd.; Baha Mar Leasing Company Ltd.; Baha Mar Ltd.; Baha Mar Operating Company Ltd.; Baha Mar Properties Ltd.; Baha Mar Sales Company Ltd.; Baha Mar Support Services Ltd.; BML Properties Ltd.; BMP Golf Ltd.; BMP Three Ltd.; Cable Beach Resorts Ltd.; and Riviera Golf Ventures Ltd.

² **Amended items are noted in bold.**

³ Any party who wishes to attend telephonically is required to make arrangements through CourtCall by telephone (866-582-6878) or by facsimile (866-533-2946), no later than 12:00 p.m. one business day prior to the hearing.

Possession to Obtain Postpetition Financing, (II) Granting Liens and Super-Priority Claims, (III) Authorizing Use of Cash Collateral, (IV) Granting Adequate Protection to Prepetition Secured Lenders, (V) Scheduling Hearing to Consider Entry of Final Order, and (VI) Granting Related Relief [Filed: 7/27/15] (Docket No. 243)

Related Documents:

- A. Declaration of Lawrence Y. Kwon in Support of Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors and Debtors in Possession to Obtain Postpetition Financing, (II) Granting Liens and Super-Priority Claims, (III) Authorizing Use of Cash Collateral, (IV) Granting Adequate Protection to Prepetition Secured Lenders, (V) Scheduling Hearing to Consider Entry of Final Order, and (VI) Granting Related Relief [Filed: 6/29/15] (Docket No. 10)
- B. Notice of Filing of Updated DIP Budget in Connection with Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors and Debtors in Possession to Obtain Postpetition Financing, (II) Granting Liens and Super-Priority Claims, (III) Authorizing Use of Cash Collateral, (IV) Granting Adequate Protection to Prepetition Secured Lenders, (V) Scheduling Hearing to Consider Entry of Final Order, and (VI) Granting Related Relief [Filed: 7/1/15] (Docket No. 43)
- C. [Signed] Interim Order Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364 and 507, Fed. R. Bankr. P. 2002, 4001, 6004 and 9014 and Del. L.R. Bankr. P. 4001-2 (I) Authorizing Debtors and Debtors in Possession to Obtain Postpetition Financing, (II) Authorizing Use of Cash Collateral, (III) Granting Liens and Super-Priority Claims, (IV) Granting Adequate Protection to Prepetition Secured Lenders, (V) Scheduling a Final Hearing, and (VI) Granting Related Relief [Filed: 7/1/15] (Docket No. 52)
- D. Notice of Entry of Interim Order and Final Hearing Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors and Debtors in Possession to Obtain Postpetition Financing, (II) Granting Liens and Super-Priority Claims, (III) Authorizing Use of Cash Collateral, (IV) Granting Adequate Protection to Prepetition Secured Lenders, (V) Scheduling Hearing to Consider Entry of Final Order, and (VI) Granting Related Relief [Filed: 7/1/15] (Docket No. 66)
- E. Amended Notice of Entry of Interim Order and Final Hearing Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors and Debtors in Possession to Obtain Postpetition Financing, (II) Granting Liens and Super-Priority Claims, (III) Authorizing Use of Cash Collateral, (IV) Granting Adequate Protection to Prepetition Secured Lenders, (V) Scheduling Hearing to Consider Entry of Final Order, and (VI) Granting Related Relief [Filed: 7/28/15] (Docket No. 261)

F. Status Report and Supplement in Support of Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors and Debtors in Possession to Obtain Postpetition Financing, (II) Granting Liens and Super-Priority Claims, (III) Authorizing Use of Cash Collateral, (IV) Granting Adequate Protection to Prepetition Secured Lenders, (V) Scheduling Hearing to Consider Entry of Final Order, and (VI) Granting Related Relief [Filed: 8/14/15] (Docket No. 387)

Status: This matter has been continued to a date and time to be determined.

2. Debtors' Motion for Entry of Order (I) Authorizing and Approving Debtors' Key Employee Incentive Program and (II) Granting Related Relief [Filed: 7/10/15] (Docket No. 117)

Original Response Deadline: July 16, 2015, at 12:00 noon; extended by agreement for the Official Committee of Unsecured Creditors to July 17, 2015, at 5:00 p.m.

New Response Deadline: August 10, 2015, at 4:00 p.m.; extended by agreement to August 13, 2015, at 4:00 p.m. for the Official Committee of Unsecured Creditors

Responses Received: Informal comments from the Office of the United States Trustee.

Related Documents:

- A. Notice of Hearing Regarding Debtors' Motion for Entry of Order (I) Authorizing and Approving Debtors' Key Employee Incentive Program and (II) Granting Related Relief [Filed: 7/13/15] (Docket No. 126)
- B. [FILED UNDER SEAL] Unredacted Exhibit B to Debtors' Motion for Entry of Order (I) Authorizing and Approving Debtors' Key Employee Incentive Program and (II) Granting Related Relief [Filed: 7/13/15] (Docket No. 130)

Status: This matter has been continued to August 28, 2015, at 10:00 a.m.

3. Debtors' Motion For Entry of an Order Authorizing Debtors to File Under Seal Exhibit to Debtors' Motion for Entry of an Order (I) Authorizing and Approving Debtors' Key Employee Incentive Program and (II) Granting Related Relief [Filed: 7/10/15] (Docket No. 118)

Original Response Deadline: Objections may be presented at the time of the hearing.

New Response Deadline: August 10, 2015, at 4:00 p.m.; extended by agreement to August 13, 2015, at 4:00 p.m. for the Official Committee of Unsecured Creditors

Responses Received: None as of the date of filing this agenda.

Related Documents:

- A. [Signed] Order Granting Motion to Shorten Notice and Request for Expedited Hearing with Respect to Debtors' Motion For Entry of an Order Authorizing Debtors to File Under Seal Exhibit to Debtors' Motion for Entry of an Order (I) Authorizing and Approving Debtors' Key Employee Incentive Program and (II) Granting Related Relief [Filed: 7/13/15] (Docket No. 129)
- B. Notice of Hearing Regarding Debtors' Motion For Entry of an Order Authorizing Debtors to File Under Seal Exhibit to Debtors' Motion for Entry of an Order (I) Authorizing and Approving Debtors' Key Employee Incentive Program and (II) Granting Related Relief [Filed: 7/13/15] (Docket No. 132)

Status: This matter has been continued to August 28, 2015, at 10:00 a.m.

- 4. CCA Bahamas, Ltd.'s Motion to Dismiss with Prejudice the Debtors' Chapter 11 Cases Pursuant to Sections 105(a), 109(a), 305(a), and 1112(b) of the Bankruptcy Code [Filed: 7/20/15] (Docket No. 206)

Response Deadline: August 10, 2015, at 4:00 p.m.

Responses Received:

- A. Joinder of Stafford-Smith, Inc. to CCA Bahamas, Ltd.'s Motion to Dismiss with Prejudice the Debtors' Chapter 11 Cases Pursuant to Sections 105(a), 109(a), 305(a), and 1112(b) of the Bankruptcy Code and Joinder to CEXIM Motion to Dismiss the Bahamian Debtors' Chapter 11 Cases Pursuant to Sections 105(a) and 1112(b) or, in the Alternative Section 305(a) of the Bankruptcy Code [Filed: 8/3/15] (Docket No. 289)
- B. Debtors' Omnibus Objection to Dismissal Motions Filed by CCA Bahamas, Ltd. and the Export-Import Bank of China [Filed: 8/10/15] (Docket No. 328)
 - i. Notice of Intent to Raise Issue of Foreign Law [Filed: 8/10/15] (Docket No. 330)
 - ii. Declaration of Thomas M. Dunlap in Support of Debtors' Omnibus Objection to Dismissal Motions [Filed: 8/10/15] (Docket No. 331)
 - iii. Declaration of Mark Shinderman in Support of Debtors' Omnibus Objection to Dismissal Motions [Filed: 8/10/15] (Docket No. 332)
 - iv. Debtors' Evidentiary Objections to Exhibits and Affidavits Submitted in Support of CCA Bahamas, Ltd.'s Motion to Dismiss with Prejudice the Debtors' Chapter 11 Cases [Filed: 8/10/15] (Docket No. 336)
 - v. [Signed] Order Granting Debtors' Motion for Entry of an Order Authorizing the Debtors to Exceed the Page Limitation for the Debtors' Omnibus Objection to Dismissal Motions Filed by CCA Bahamas, Ltd. and the Export-Import Bank of China [Filed: 8/11/15] (Docket No. 339)

- vi. Supplemental Declaration of Thomas M. Dunlap in Support of Debtors' Omnibus Objection to Dismissal Motions [Filed: 8/12/15] (Docket No. 343)
- C. Omnibus Objection of the Official Committee of Unsecured Creditors to Dismissal Motions Filed by CCA Bahamas, Ltd. and the Export-Import Bank of China and Joinder in the Debtors' Omnibus Objection [Filed: 8/10/15] (Docket No. 329)
- D. Joinder of Strategic Outsourcing, Inc. to Omnibus Objections of the Debtors and the Official Committee of Unsecured Creditors to Dismissal Motions Filed by CCA Bahamas, Ltd. and the Export-Import Bank of China [Filed: 8/12/15] (Docket No. 347)
- E. **Joinder of Styleworks, LLC to Omnibus Objections of the Debtors and the Official Committee of Unsecured Creditors to Dismissal Motions Filed by CCA Bahamas, Ltd. and the Export-Import Bank of China [Filed: 8/13/15] (Docket No. 362)**

Reply Deadline: August 14, 2015, at 12:00 noon

Replies Received:

- A. **Reply in Support of CCA Bahamas, Ltd.'s Motion to Dismiss with Prejudice the Debtors' Chapter 11 Cases Pursuant to Sections 105(a), 109(a), 305(a) and 1112(b) of the Bankruptcy Code [Filed: 8/14/15] (Docket No. 375)**
 - i. **CCA Bahamas, Ltd.'s Motion for Entry of an Order, Pursuant to Section 107(b) of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Rule 9018-1(b) and (d), Authorizing CCA Bahamas Ltd. to File Reply in Support of CCA Bahamas, Ltd.'s Motion to Dismiss with Prejudice the Debtors' Chapter 11 Cases Pursuant to Sections 105(a), 109(a), 305(a) and 1112(b) of the Bankruptcy Code Under Seal [Filed: 8/14/15] (Docket No. 376)**
 - ii. **Notice of Exhibits A - I to Reply in Support of CCA Bahamas, Ltd.'s Motion to Dismiss with Prejudice the Debtors' Chapter 11 Cases Pursuant to Sections 105(a), 109(a), 305(a) and 1112(b) of the Bankruptcy Code [Filed: 8/14/15] (Docket No. 379)**
 - iii. **[Signed] Order Granting Leave to Exceed Page Limit Requirements with Respect to Reply in Support of CCA Bahamas, Ltd.'s Motion to Dismiss with Prejudice the Debtors' Chapter 11 Cases Pursuant to Sections 105(a), 109(a), 305(a) and 1112(b) of the Bankruptcy Code [Filed: 8/14/15] (Docket No. 384)**

Related Documents:

- A. Affidavit of Timothy A. Eneas in Support of CCA Bahamas, Ltd.'s Motion to Dismiss with Prejudice the Debtors' Chapter 11 Cases Pursuant to Sections 105(a), 109(a), 305(a), and 1112(b) of the Bankruptcy Code [Filed: 7/20/15] (Docket No. 207)
- B. Notice of Motion [Filed: 7/20/15] (Docket No. 211)
- C. Notice of Supplement to Exhibit D to CCA Bahamas, Ltd.'s Motion to Dismiss with Prejudice the Debtors' Chapter 11 Cases Pursuant to Sections 105(a), 109(a), 305(a), and 1112(b) of the Bankruptcy Code [Filed: 7/21/15] (Docket No. 213)
- D. [Signed] Order Extending Objection Deadline with Respect to CCA Bahamas, Ltd.'s Motion to Dismiss with Prejudice the Debtors' Chapter 11 Cases [Filed: 7/27/15] (Docket No. 241)
- E. Supplemental Affidavit of Timothy A. Eneas in Support of CCA Bahamas, Ltd.'s Motion to Dismiss with Prejudice the Debtors' Chapter 11 Cases Pursuant to Sections 105(a), 109(a), 305(a), and 1112(b) of the Bankruptcy Code [Filed: 7/29/15] (Docket No. 265)
- F. Notice Under Federal Rule of Civil Procedure 44.1 (Docket No. 341)

Status: This matter has been continued to August 28, 2015, at 10:00 a.m.

- 5. CCA Bahamas, Ltd.'s Motion, Pursuant to Sections 105(a) and 305(a) of the Bankruptcy Code, for Entry of an Order Deferring Consideration of All Pending Matters [Filed: 7/20/15] (Docket No. 208)

Response Deadline: August 10, 2015, at 4:00 p.m.

Responses Received:

- A. Debtors' Omnibus Objection to Dismissal Motions Filed by CCA Bahamas, Ltd. and the Export-Import Bank of China [Filed: 8/10/15] (Docket No. 328)
 - i. Notice of Intent to Raise Issue of Foreign Law [Filed: 8/10/15] (Docket No. 330)
 - ii. Declaration of Thomas M. Dunlap in Support of Debtors' Omnibus Objection to Dismissal Motions [Filed: 8/10/15] (Docket No. 331)
 - iii. Declaration of Mark Shinderman in Support of Debtors' Omnibus Objection to Dismissal Motions [Filed: 8/10/15] (Docket No. 332)
 - iv. Debtors' Evidentiary Objections to Exhibits and Affidavits Submitted in Support of CCA Bahamas, Ltd.'s Motion to Dismiss with Prejudice the Debtors' Chapter 11 Cases [Filed: 8/10/15] (Docket No. 336)

- v. [Signed] Order Granting Debtors' Motion for Entry of an Order Authorizing the Debtors to Exceed the Page Limitation for the Debtors' Omnibus Objection to Dismissal Motions Filed by CCA Bahamas, Ltd. and the Export-Import Bank of China [Filed: 8/11/15] (Docket No. 339)
- vi. Supplemental Declaration of Thomas M. Dunlap in Support of Debtors' Omnibus Objection to Dismissal Motions [Filed: 8/12/15] (Docket No. 343)
- B. Omnibus Objection of the Official Committee of Unsecured Creditors to Dismissal Motions Filed by CCA Bahamas, Ltd. and the Export-Import Bank of China and Joinder in the Debtors' Omnibus Objection [Filed: 8/10/15] (Docket No. 329)
- C. Joinder of Strategic Outsourcing, Inc. to Omnibus Objections of the Debtors and the Official Committee of Unsecured Creditors to Dismissal Motions Filed by CCA Bahamas, Ltd. and the Export-Import Bank of China [Filed: 8/12/15] (Docket No. 347)
- D. Joinder of Styleworks, LLC to Omnibus Objections of the Debtors and the Official Committee of Unsecured Creditors to Dismissal Motions Filed by CCA Bahamas, Ltd. and the Export-Import Bank of China [Filed: 8/13/15] (Docket No. 362)**

Reply Deadline: August 14, 2015, at 12:00 noon

Replies Received: None as of the date of filing this Agenda.

Related Documents:

- A. [Signed] Order Pursuant to Bankruptcy Rule 9006(c) and Local Rule 9006-1(e), Shortening the Time for Notice of CCA Bahamas, Ltd.'s Motion, Pursuant to Sections 105(a) and 305(a) of the Bankruptcy Code, for Entry of an Order Deferring Consideration of All Pending Matters [Filed: 7/22/15] (Docket No. 224)

Status: This matter has been continued to August 28, 2015, at 10:00 a.m.

- 6. Motion of CEXIM to Dismiss the Bahamian Debtors' Chapter 11 Cases Pursuant to Sections 105(a) and 1112(b) or, in the Alternative, Section 305(a) of the Bankruptcy Code [Filed: 7/27/15] (Docket No. 246)

Response Deadline: August 10, 2015, at 4:00 p.m.

Responses Received:

- A. Joinder of Stafford-Smith, Inc. to CCA Bahamas, Ltd.'s Motion to Dismiss with Prejudice the Debtors' Chapter 11 Cases Pursuant to Sections 105(a), 109(a),

305(a), and 1112(b) of the Bankruptcy Code and Joinder to CEXIM Motion to Dismiss the Bahamian Debtors' Chapter 11 Cases Pursuant to Sections 105(a) and 1112(b) or, in the Alternative Section 305(a) of the Bankruptcy Code [Filed: 8/3/15] (Docket No. 289)

- B. Debtors' Omnibus Objection to Dismissal Motions Filed by CCA Bahamas, Ltd. and the Export-Import Bank of China [Filed: 8/10/15] (Docket No. 328)
 - i. Notice of Intent to Raise Issue of Foreign Law [Filed: 8/10/15] (Docket No. 330)
 - ii. Declaration of Thomas M. Dunlap in Support of Debtors' Omnibus Objection to Dismissal Motions [Filed: 8/10/15] (Docket No. 331)
 - iii. Declaration of Mark Shinderman in Support of Debtors' Omnibus Objection to Dismissal Motions [Filed: 8/10/15] (Docket No. 332)
 - iv. Debtors' Evidentiary Objections to Exhibits Submitted in Support of Motion of CEXIM to Dismiss the Bahamian Debtors' Chapter 11 Cases [Filed: 8/10/15] (Docket No. 335)
 - v. [Signed] Order Granting Debtors' Motion for Entry of an Order Authorizing the Debtors to Exceed the Page Limitation for the Debtors' Omnibus Objection to Dismissal Motions Filed by CCA Bahamas, Ltd. and the Export-Import Bank of China [Filed: 8/11/15] (Docket No. 339)
- C. Omnibus Objection of the Official Committee of Unsecured Creditors to Dismissal Motions Filed by CCA Bahamas, Ltd. and the Export-Import Bank of China and Joinder in the Debtors' Omnibus Objection [Filed: 8/10/15] (Docket No. 329)
- D. Joinder of Strategic Outsourcing, Inc. to Omnibus Objections of the Debtors and the Official Committee of Unsecured Creditors to Dismissal Motions Filed by CCA Bahamas, Ltd. and the Export-Import Bank of China [Filed: 8/12/15] (Docket No. 347)
- E. **Joinder of Styleworks, LLC to Omnibus Objections of the Debtors and the Official Committee of Unsecured Creditors to Dismissal Motions Filed by CCA Bahamas, Ltd. and the Export-Import Bank of China [Filed: 8/13/15] (Docket No. 362)**

Reply Deadline: August 14, 2015, at 12:00 noon

Replies Received:

- A. **CEXIM's Reply to Objections to CEXIM's Motion to Dismiss [Filed: 8/14/15] (Docket No. 374)**

Related Documents:

- A. Notice of Foreign Law Pursuant to Federal Rule of Civil Procedure 44.1 [Filed: 8/5/15] (Docket No. 300)

Status: This matter has been continued to August 28, 2015, at 10:00 a.m.

UNCONTESTED MATTERS WITH CERTIFICATIONS OF NO OBJECTION OR CERTIFICATIONS OF COUNSEL:

7. Debtors' Motion Pursuant to Sections 105(a), 330 and 331 of the Bankruptcy Code for an Administrative Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Filed: 7/27/15] (Docket No. 245)

Response Deadline: August 10, 2015, at 4:00 p.m.

Responses Received: Informal comments from the Office of the United States Trustee.

Related Documents:

- A. Certification of Counsel Regarding Debtors' Motion Pursuant to Sections 105(a), 330 and 331 of the Bankruptcy Code for an Administrative Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Filed: 8/12/15] (Docket No. 348)
- B. **[Signed] Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professional [Filed: 8/13/15] (Docket No. 364)**

Status: An order has been entered resolving this matter.

8. Debtors' Motion for Order (I) Authorizing Debtors to Retain Professionals Used in the Ordinary Course of Business *Nunc Pro Tunc* to Petition Date and (II) Granting Related Relief [Filed: 7/27/15] (Docket No. 249)

Response Deadline: August 10, 2015, at 4:00 p.m.

Responses Received: Informal comments from the Office of the United States Trustee.

Related Documents:

- A. Certification of Counsel Regarding Debtors' Motion for Order (I) Authorizing Debtors to Retain Professionals Used in the Ordinary Course of Business *Nunc Pro Tunc* to Petition Date and (II) Granting Related Relief [Filed: 8/12/15] (Docket No. 349)
- B. **[Signed] Order (I) Authorizing Debtors to Retain Professionals Used in Ordinary Course of Business *Nunc Pro Tunc* to Petition Date and (II) Granting Related Relief [Filed: 8/13/15] (Docket No. 365)**

Status: An order has been entered resolving this matter.

9. Debtors' Application for Entry of Order Authorizing Retention and Employment of Milbank, Tweed, Hadley & McCloy LLP as Attorneys for the Debtors *Nunc Pro Tunc* to Petition Date [Filed: 7/27/15] (Docket No. 251)

Response Deadline: August 10, 2015, at 4:00 p.m.

Responses Received: Informal comments from the Office of the United States Trustee.

Related Documents:

- A. Certification of No Objection Regarding Debtors' Application for Entry of Order Authorizing Retention and Employment of Milbank, Tweed, Hadley & McCloy LLP as Attorneys for the Debtors *Nunc Pro Tunc* to Petition Date [Filed: 8/12/15] (Docket No. 350)
- B. **[Signed] Order Authorizing Retention and Employment of Milbank, Tweed, Hadley & McCloy LLP as Attorneys for the Debtors *Nunc Pro Tunc* to Petition Date [Filed: 8/13/15] (Docket No. 366)**

Status: An order has been entered resolving this matter.

10. Debtors' Application for an Order Authorizing Employment and Retention of Prime Clerk LLC as Administrative Advisor *Nunc Pro Tunc* to the Petition Date [Filed: 7/27/15] (Docket No. 252)

Response Deadline: August 10, 2015, at 4:00 p.m.

Responses Received: None as of the date of filing this Agenda.

Related Documents:

- A. Certification of No Objection Regarding Debtors' Application for an Order Authorizing Employment and Retention of Prime Clerk LLC as Administrative Advisor *Nunc Pro Tunc* to the Petition Date [Filed: 8/12/15] (Docket No. 351)
- B. **[Signed] Order Authorizing Employment and Retention of Prime Clerk LLC as Administrative Advisor *Nunc Pro Tunc* to the Petition Date [Filed: 8/13/15] (Docket No. 367)**

Status: An order has been entered resolving this matter.

11. Debtors' Application for Entry of Order Pursuant to 11 U.S.C. § 327(e) Authorizing Retention and Employment of Glaser Weil Fink Howard Avchen & Shapiro LLP as Special Litigation Counsel for the Debtors *Nunc Pro Tunc* to Petition Date [Filed: 7/27/15] (Docket No. 253)

Response Deadline: August 10, 2015, at 4:00 p.m.

Responses Received: Informal comments from the Office of the United States Trustee.

Related Documents:

- A. Certification of No Objection Regarding Debtors' Application for Entry of Order Pursuant to 11 U.S.C. § 327(e) Authorizing Retention and Employment of Glaser Weil Fink Howard Avchen & Shapiro LLP as Special Litigation Counsel for the Debtors *Nunc Pro Tunc* to Petition Date [Filed: 8/12/15] (Docket No. 352)
- B. **[Signed] Order Pursuant to 11 U.S.C. § 327(e) Authorizing Retention and Employment of Glaser Weil Fink Howard Avchen & Shapiro LLP as Special Litigation Counsel for the Debtors *Nunc Pro Tunc* to Petition Date [Filed: 8/13/15] (Docket No. 368)**

Status: An order has been entered resolving this matter.

- 12. Debtors' Application for Entry of Order Pursuant to 11 U.S.C. § 327(a) Authorizing Retention and Employment of Maurice O. Ginton & Co. as Special Bahamian Co-Counsel for the Debtors *Nunc Pro Tunc* to July 22, 2015 [Filed: 7/27/15] (Docket No. 254)

Response Deadline: August 10, 2015, at 4:00 p.m.

Responses Received: Informal comments from the Office of the United States Trustee.

Related Documents:

- A. Certification of No Objection Regarding Debtors' Application for Entry of Order Pursuant to 11 U.S.C. § 327(a) Authorizing Retention and Employment of Maurice O. Ginton & Co. as Special Bahamian Co-Counsel for the Debtors *Nunc Pro Tunc* to July 22, 2015 [Filed: 8/12/15] (Docket No. 353)

Status: A certification of no objection has been filed. The Debtors request entry of the proposed order at the Court's convenience. No hearing is necessary.

- 13. Debtors' Application for Entry of Order Pursuant to 11 U.S.C. § 327(e) Authorizing Retention and Employment of Kobre & Kim LLP as Special Litigation Counsel for the Debtors *Nunc Pro Tunc* to Petition Date [Filed: 7/27/15] (Docket No. 256)

Response Deadline: August 10, 2015, at 4:00 p.m.

Responses Received: Informal comments from the Office of the United States Trustee.

Related Documents:

- A. Certification of No Objection Regarding Debtors' Application for Entry of Order Pursuant to 11 U.S.C. § 327(e) Authorizing Retention and Employment of Kobre

& Kim LLP as Special Litigation Counsel for the Debtors *Nunc Pro Tunc* to Petition Date [Filed: 8/12/15] (Docket No. 354)

- B. [Signed] Order Pursuant to 11 U.S.C. § 327(e) Authorizing Retention and Employment of Kobre & Kim LLP as Special Litigation Counsel for the Debtors *Nunc Pro Tunc* to Petition Date [Filed: 8/13/15] (Docket No. 369)**

Status: An order has been entered resolving this matter.

14. Debtors' Application for Entry of Order (I) Authorizing Retention and Employment of Moelis & Company LLC as Financial Advisor and Investment Banker *Nunc Pro Tunc* to Petition Date and (II) Waiving Information Requirements of Local Rule 2016-2(d) [Filed: 7/27/15] (Docket No. 257)

Response Deadline: August 10, 2015, at 4:00 p.m.

Responses Received: Informal comments from the Office of the United States Trustee.

Related Documents:

- A. Certification of Counsel Regarding Debtors' Application for Entry of Order (I) Authorizing Retention and Employment of Moelis & Company LLC as Financial Advisor and Investment Banker *Nunc Pro Tunc* to Petition Date and (II) Waiving Information Requirements of Local Rule 2016-2(d) [Filed: 8/12/15] (Docket No. 355)
- B. [Signed] Order (I) Authorizing the Debtors to Retain and Employ Moelis & Company LLC as Financial Advisor and Investment Banker *Nunc Pro Tunc* to Petition Date and (II) Waiving Information Requirements of Local Rule 2016-2(d) [Filed: 8/13/15] (Docket No. 370)**

Status: An order has been entered resolving this matter.

MATTERS GOING FORWARD:

15. Debtors' Application Pursuant to Section 327(a) of the Bankruptcy Code, Rule 2014 of the Federal Rules of Bankruptcy Procedure and Local Rule 2014-1 for Authorization to Employ and Retain Pachulski Stang Ziehl & Jones LLP as Co-Counsel for the Debtors and Debtors in Possession *Nunc Pro Tunc* to the Petition Date [Filed: 7/27/15] (Docket No. 250)

Response Deadline: August 10, 2015, at 4:00 p.m.

Responses Received: Informal comments from the Office of the United States Trustee.

Related Documents:

- A. **Certification of Counsel Regarding Debtors' Application Pursuant to Section 327(a) of the Bankruptcy Code, Rule 2014 of the Federal Rules of Bankruptcy Procedure and Local Rule 2014-1 for Authorization to Employ and Retain Pachulski Stang Ziehl & Jones LLP as Co-Counsel for the Debtors and Debtors in Possession Nunc Pro Tunc to the Petition Date [Filed: 8/13/15] (Docket No. 371)**

Status: A revised proposed order has been submitted under certification of counsel. The Debtors request entry of the revised proposed order at the Court's convenience. No hearing is necessary.

16. Application of the Official Committee of Unsecured Creditors of Northshore Mainland Services, Inc., *et al.*, for Entry of an Order Authorizing the Employment and Retention of Cooley LLP as Lead Counsel *Nunc Pro Tunc* to July 14, 2015 [Filed: 7/31/15] (Docket No. 283)

Response Deadline: August 13, 2015, at 12:00 noon

Responses Received: None as of the date of filing this Agenda.

Related Documents:

- A. [Signed] Order Shortening Time with Respect to (A) Application of the Official Committee of Unsecured Creditors of Northshore Mainland Services, Inc., *et al.*, for Entry of an Order Authorizing the Employment and Retention of Cooley LLP as Lead Counsel *Nunc Pro Tunc* to July 14, 2015 and (B) Application of Official Committee of Unsecured Creditors of Northshore Mainland Services, Inc., *et al.*, for Entry of an Order Authorizing the Employment and Retention of Whiteford, Taylor & Preston LLC as Delaware Counsel *Nunc Pro Tunc* to July 14, 2015 [Filed: 8/3/15] (Docket No. 286)

Status: This matter will go forward.

CONTINUED MATTER:

17. Emergency Motion by Strategic Outsourcing, Inc., Debtor's Professional Employer Organization Services Provider, for Order Clarifying Debtor's Obligation to Fund All Payments of Employee Wages and Benefits and for Adequate Assurance of Performance of Service Agreement and for an Immediate Hearing [Filed: 7/9/15] (Docket No. 94)

Response Deadline: None set.

Responses Received:

- A. Debtors' Objection to Emergency Motion by Strategic Outsourcing, Inc., Debtor's Professional Employer Organization Services Provider, for Order Clarifying Debtor's Obligation to Fund All Payments of Employee Wages and

Benefits and for Adequate Assurance of Performance of Service Agreement and for an Immediate Hearing [Filed: 7/9/15] (Docket No. 98)

Related Documents:

- A. [Signed] Preliminary Order on Emergency Motion by Strategic Outsourcing, Inc., Debtor's Professional Employer Organization Services Provider, for Order Clarifying Debtor's Obligation to Fund All Payments of Employee Wages and Benefits and for Adequate Assurance of Performance of Service Agreement and for an Immediate Hearing [Filed: 7/14/15] (Docket No. 162)
- B. Declaration of Keith C. Owens Re: Continued Hearing on Strategic Outsourcing, Inc.'s Emergency Motion for Order Clarifying Debtor's Obligation to Fund All Payments of Employee Wages and Benefits and for Adequate Assurance of Performance of Service Agreement [Filed: 7/20/15] (Docket No. 189)

Status: This matter has been continued to August 28, 2015, at 10:00 a.m.

CONTESTED MATTERS GOING FORWARD:

- 18. Debtors' Motion for Entry of Order, Pursuant to Section 105(a) of the Bankruptcy Code, Bankruptcy Rule 2004, and Local Bankruptcy Rule 2004-1, Authorizing the Examination of China Construction America Inc. and Certain Related Entities [Filed: 7/9/15] (Docket No. 105)

Response Deadline: July 16, 2015, at 4:00 p.m.; extended for China Construction America Inc. to July 17, 2015, at 4:00 p.m.

Responses Received:

- A. China Construction America Inc. and CCA Bahamas, Ltd.'s Objection to the Debtors' Motion for Entry of Order, Pursuant to Section 105(a) of the Bankruptcy Code, Bankruptcy Rule 2004, and Local Bankruptcy Rule 2004-1, Authorizing the Examination of China Construction America Inc. and Certain Related Entities [Filed: 7/17/15] (Docket No. 179)
 - i. Declaration of Jun Li in Support of China Construction America Inc. and CCA Bahamas, Ltd.'s Objection to the Debtors' Motion for Entry of Order, Pursuant to Section 105(a) of the Bankruptcy Code, Bankruptcy Rule 2004, and Local Bankruptcy Rule 2004-1, Authorizing the Examination of China Construction America Inc. and Certain Related Entities [Filed: 7/17/15] (Docket No. 180)

Replies Received:

- A. Debtors' Reply Memorandum in Further Support of Motion for Entry of Order, Pursuant to Section 105(a) of the Bankruptcy Code, Bankruptcy Rule 2004, and Local Bankruptcy Rule 2004-1, Authorizing the Examination of China

Construction America Inc. and Certain Related Entities [Filed: 8/12/15] (Docket No. 345)

i. Declaration of David Bullard [Filed: 8/12/15] (Docket No. 346)

Related Documents:

- A. **Letter to The Honorable Kevin J. Carey from Michael Guiffre Requesting Continuance of Rule 2004 Examination Motion [Filed: 8/14/15] (Docket No. 373)**
- B. **[Signed] Order Granting China Construction America Inc. and CCA Bahamas, Ltd.'s Motion for Leave to File Surreply to Debtors' Reply Memorandum in Further Support of Motion for Entry of Order, Pursuant to Section 105(a) of the Bankruptcy Code, Bankruptcy Rule 2004, and Local Bankruptcy Rule 2004-1, Authorizing the Examination of China Construction America Inc. and Certain Related Entities [Filed: 8/14/15] (Docket No. 385)**

Status: This matter will go forward.

- 19. Debtors' Application for an Order Authorizing the Retention and Employment of Ginton Sweeting O'Brien as Special Bahamian Counsel, *Nunc Pro Tunc* to the Petition Date [Filed: 7/27/15] (Docket No. 255)

Response Deadline: August 10, 2015, at 4:00 p.m.

Responses Received:

- A. Limited Objection of the United States Trustee to Debtors' Application for an Order Authorizing the Retention and Employment of Ginton Sweeting O'Brien as Special Bahamian Counsel, *Nunc Pro Tunc* to the Petition Date [Filed: 8/7/15] (Docket No. 320)

Related Documents:

- A. **Supplemental Declaration of Roy W.M. Sweeting in Support of Debtors' Application for an Order Authorizing the Retention and Employment of Ginton Sweeting O'Brien as Special Bahamian Counsel, Nunc Pro Tunc to the Petition Date [Filed: 8/14/15] (Docket No. 386)**

Status: This matter has been continued to August 28, 2015, at 10:00 a.m.

- 20. Application of Official Committee of Unsecured Creditors of Northshore Mainland Services, Inc., *et al.*, for Entry of an Order Authorizing the Employment and Retention of Whiteford, Taylor & Preston LLC as Delaware Counsel *Nunc Pro Tunc* to July 14, 2015 [Filed: 7/31/15] (Docket No. 284)

Response Deadline: August 13, 2015, at 12:00 noon

Responses Received:

- A. United States Trustee's Objection to Application of Official Committee of Unsecured Creditors of Northshore Mainland Services, Inc., *et al.*, for Entry of an Order Authorizing the Employment and Retention of Whiteford, Taylor & Preston LLC as Delaware Counsel *Nunc Pro Tunc* to July 14, 2015 [Filed: 8/13/15] (Docket No. 356)

Related Documents:

- A. [Signed] Order Shortening Time with Respect to (A) Application of the Official Committee of Unsecured Creditors of Northshore Mainland Services, Inc., *et al.*, for Entry of an Order Authorizing the Employment and Retention of Cooley LLP as Lead Counsel *Nunc Pro Tunc* to July 14, 2015 and (B) Application of Official Committee of Unsecured Creditors of Northshore Mainland Services, Inc., *et al.*, for Entry of an Order Authorizing the Employment and Retention of Whiteford, Taylor & Preston LLC as Delaware Counsel *Nunc Pro Tunc* to July 14, 2015 [Filed: 8/3/15] (Docket No. 286)

Status: This matter will go forward.

Wilmington, Delaware
Dated: August 14, 2015

PACHULSKI STANG ZIEHL & JONES LLP



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Proposed Counsel to Debtors and Debtors in Possession