

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

In re:)	
)	Chapter 11
)	
NORTHSHORE MAINLAND SERVICES INC., ¹)	Case No. 15-11402 (KJC)
)	
Debtor.)	Obj. Deadline: January 6, 2016 at 4:00 p.m. (ET)
)	Hearing Date: January 13, 2016 at 10:00 a.m. (ET)
)	
)	

**NOTICE OF DEBTOR’S MOTION FOR
ENTRY OF ORDER DISMISSING CHAPTER 11 CASE**

TO: (a) the U.S. Trustee; (b) counsel to the Official Committee of Unsecured Creditors; (c) counsel to the Debtor’s prepetition and postpetition secured lenders; (d) the Debtor’s landlords; (e) any persons who have filed a request for notice in the above-captioned case pursuant to Local Rule 2002-1; and (f) all known creditors of the Debtor.

PLEASE TAKE NOTICE that, on December 22, 2015, the above-captioned debtor and debtor in possession (the “Debtor”) filed the *Debtor’s Motion for Entry of Order Dismissing Chapter 11 Case* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801 (the “Bankruptcy Court”). A copy of the Motion is available for free at <https://cases.primeclerk.com/northshore>.

PLEASE TAKE FURTHER NOTICE that any response or objection to the entry of an order with respect to the relief sought in the Motion must be filed with the Bankruptcy Court on or before **January 6, 2016, at 4:00 p.m. (prevailing Eastern time)**.

PLEASE TAKE FURTHER NOTICE that, at the same time, you must also serve a copy of the response or objection upon: (a) counsel to the Debtor, (i) Milbank, Tweed, Hadley & McCloy LLP, 601 S. Figueroa Street, 30th Floor, Los Angeles, CA 90017, Attn: Paul S. Aronzon, Esquire, and Mark Shinderman, Esquire, (ii) Milbank, Tweed, Hadley & McCloy LLP, 28 Liberty Street, New York, NY 10005, Attn: Tyson Lomazow, Esquire, Thomas J. Matz, Esquire, and Steven Z. Szanzer, Esquire, and (iii) Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, Wilmington, DE 19801, Attn: Laura Davis Jones, Esquire; (b) the U.S. Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801, Attn: Jane Leamy, Esquire; and (c) counsel to the Official Committee of Unsecured Creditors, (i) Cooley LLP, 1114 Avenue of the Americas, New York, NY 01136, Attn: Lawrence C. Gottlieb, Esquire, and (ii) Whiteford, Taylor & Preston LLC, The Renaissance Centre, 405 North King Street, Suite 500, Wilmington, DE 19801, Attn: Christopher M. Samis, Esquire.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

¹ The last four digits of the Debtor’s federal tax identification number are 9087.

PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE RELIEF SOUGHT IN THE MOTION WILL BE HELD ON JANUARY 13, 2016 AT 10:00 A.M. (PREVAILING EASTERN TIME) BEFORE THE HONORABLE KEVIN J. CAREY, UNITED STATES BANKRUPTCY JUDGE, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, 5TH FLOOR, COURTROOM NO. 5, WILMINGTON, DELAWARE 19801.

Dated: December 22, 2015

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Laura Davis Jones

Laura Davis Jones (Bar No. 2436)
James E. O'Neill (Bar. No. 4042)
Colin R. Robinson (Bar. No. 5524)
Peter J. Keane (Bar. No. 5503)
919 North Market Street, 17th Floor
Wilmington, DE 19801
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: ljones@pszjlaw.com
joneill@pszjlaw.com
crobinson@pszjlaw.com
pkeane@pszjlaw.com

-and-

MILBANK, TWEED, HADLEY & McCLOY LLP

Paul S. Aronzon (admitted *pro hac vice*)
Mark Shinderman (admitted *pro hac vice*)
601 S. Figueroa Street, 30th Floor
Los Angeles, CA 90017
Telephone: (213) 892-4000
Facsimile: (213) 629-5063
Email: paronzon@milbank.com
mshinderman@milbank.com

-and-

MILBANK, TWEED, HADLEY & McCLOY LLP

Tyson Lomazow (admitted *pro hac vice*)
Thomas J. Matz (admitted *pro hac vice*)
Steven Z. Szanzer (admitted *pro hac vice*)
28 Liberty Street
New York, NY 10005
Telephone: (212) 530-5000
Facsimile: (212) 530-5219
Email: tlomazow@milbank.com
tmatz@milbank.com
sszanzer@milbank.com

Counsel to Debtor and Debtor in Possession