

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:

NORTHSTAR OFFSHORE
GROUP, LLC,

DEBTOR.

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Case No. 16-34028

(Chapter 11)

**DEBTOR’S PROPOSED AGENDA OF EMERGENCY FIRST DAY
HEARING SCHEDULED FOR DECEMBER 6, 2016**

Time and Date of Hearing: **Emergency First Day Hearing**
December 6, 2016 at 10:00 am (Central Prevailing Time)

Location of Hearing: The Honorable Marvin Isgur
United States Bankruptcy Judge
Courtroom 404
515 Rusk, Houston, Texas

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

I. INTRODUCTION AND OPENING REMARKS

II. MOTIONS TO BE HEARD AT THE EMERGENCY FIRST DAY HEARING

A. Debtor-In-Possession Financing and Use of Cash

1. Emergency Motion for Entry of Interim and Final Orders (i) Authorizing Debtor to (a) Obtain Priming and Superpriority Postpetition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1) and 364(e) and (b) Use Cash Collateral Pursuant to 11 U.S.C. § 363, (ii) Granting Adequate Protection Pursuant to 11 U.S.C. §§ 361, 362, 363 and 364, (iii) Scheduling a Final Hearing Pursuant to Bankruptcy Rules 4001(b) and (c) and (iv) Granting Related Relief [Dkt. No. 105]

- a) Declaration of Avery C. Alcorn in Support of First Day Pleadings [Dkt. No. 106]

Responses Received

- a) Objection filed by Platinum Credit Opportunities Fund, LP and Platinum Partners Liquid Opportunities Master Fund LP [Dkt. No. 118]
 - b) Informal response received by email from counsel for the U.S. Department of the Interior
 - c) Informal response received by email from counsel for Eleanor Fiduciary Services, LLC
2. Emergency Motion to (i) Approve Maintenance of Certain Prepetition Bank Accounts and Cash Management Systems and (ii) Continue Use of Existing Checks and Business Forms [Dkt. No. 98]

Responses Received

None

B. Operational Motions Requesting Immediate Relief

1. Emergency Motion for Leave to Substitute Counsel and Withdraw Appearance [Dkt. No. 104]

Responses Received

None

2. Emergency Motion for Entry of an Order (a) Extending Time to File Schedule of Assets and Liabilities, Schedule of Executory Contracts and Unexpired Leases and Statement of Financial Affairs and (b) Authorizing the Proposed Form and Manner of Notice of Commencement of this Chapter 11 Case [Dkt. No. 96]

Responses Received

None

3. Emergency Motion for Appointment of Prime Clerk as Claims, Noticing and Solicitation Agent [Dkt. No. 97]

Responses Received

None

4. Emergency Motion for Entry of an Order Authorizing the Debtor to Maintain and Perform its Obligations to Employees in Accordance with Prepetition Practices of the Debtor [Dkt. No. 99]

Responses Received

None

5. Emergency Motion for Order Providing Adequate Assurance of Utility Payments [Dkt. No. 100]

Responses Received

None

6. Emergency Motion for an Order Authorizing the Debtor to Pay Certain Royalties and Severance Taxes that Accrued During the Gap Period [Dkt. No. 101]

Responses Received

None

7. Emergency Motion for Entry of an Order Authorizing the Debtor to Pay Prepetition Premiums in Connection with Certain Surety Bonds [Dkt. No. 102]

Responses Received

None

8. Emergency Motion for Entry of an Order Clarifying the Status of the Voluntary Petition [Dkt. No. 103]

Responses Received

None

Dated: December 5, 2016

Respectfully submitted,

DIAMOND McCARTHY LLP

/s/ Kyung S. Lee

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