

2. Debtors' Application for an Order Authorizing the Retention and Employment of Young Conaway Stargatt & Taylor, LLP as Co-Counsel for the Debtors, Effective as of the Petition Date [D.I. 73, 5/10/17]

Objection Deadline: May 24, 2017 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors

Related Documents:

- A. Supplemental Declaration of Pauline K. Morgan in Support of the Debtors' Application for an Order Authorizing the Retention and Employment of Young Conaway Stargatt & Taylor [D.I. 103, 5/24/17]
- B. Certificate of No Objection [D.I. 120, 6/1/17]
- C. Proposed Order

Objections Filed: None

Status: No objections have been received, and a Certificate of No Objection has been filed. No hearing is required unless the Court has questions.

3. Application of the Debtors for Entry of an Order Authorizing Debtors to Retain and Employ Squire Patton Boggs (US) LLP as Special Counsel Effective as of the Petition Date [D.I. 74, 5/10/17]

Objection Deadline: May 24, 2017 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors

Related Documents:

- A. Certificate of No Objection [D.I. 121, 6/1/17]
- B. Proposed Order

Objections Filed: None

Status: No objections have been received, and a Certificate of No Objection has been filed. No hearing is required unless the Court has questions.

4. Debtors' Application for an Order Authorizing Employment and Retention of Prime Clerk LLC as Administrative Advisor Effective as of the Petition Date [D.I. 76, 5/10/17]

Objection Deadline: May 24, 2017 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors

Related Documents:

- A. Certificate of No Objection [D.I. 122, 6/1/17]
- B. Proposed Order

Objections Filed: None

Status: No objections have been received, and a Certificate of No Objection has been filed. No hearing is required unless the Court has questions.

CONTESTED MATTERS GOING FORWARD

5. Debtors' Motion for Interim and Final Orders (I) Prohibiting Utility Companies from Discontinuing, Altering or Refusing Service, (II) Deeming Utility Companies to Have Adequate Assurance of Payment and (III) Establishing Procedures for Resolving Requests for Additional Assurance [D.I. 5, 5/1/17]

Objection Deadline: May 24, 2017 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors

Related Documents:

- A. Interim Order (I) Prohibiting Utility Companies From Discontinuing, Altering or Refusing Service (II) Deeming Utility Companies to Have Adequate Assurance of Payment and (III) Establishing Procedure for Resolving Requests for Additional Assurance [D.I. 53, 5/2/17]

Objections Filed:

- A. Informal comments of the Official Committee of Unsecured Creditors

Status: The Committee's informal comments have been resolved subject to documentation, and a revised proposed order will be submitted under Certification of Counsel in advance of the Hearing.

6. Motion for Entry of an Order Authorizing the Debtors to (I) Pay Prepetition Employee, Independent Contractor and Director Wages, Salaries and Other Compensation, (II) Reimburse Prepetition Employee Business Expenses, (III) Contribute to Prepetition Employee Benefit Programs and Continue Such Programs Postpetition, (IV) Make Payments for which Prepetition Payroll Deductions Were Made, (V) Pay Workers' Compensation Obligations, and (VI) Pay All Costs and Expenses Incident to the Foregoing [D.I. 7, 5/1/17]

Objection Deadline: May 24, 2017 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors

Related Documents:

- A. Interim Order Authorizing the Debtors to (I) Pay Prepetition Employee and Independent Contractor Wages, Salaries and Other Compensation, (II) Reimburse Prepetition Employee Business Expenses, (III) Contribute to Prepetition Employee Benefit Programs and Continue Such Programs Postpetition, (IV) Make Payments for Which Prepetition Payroll Deductions Were Made, (V) Pay Workers' Compensation Obligations, and (VI) Pay All Costs and Expenses Incident to the Foregoing [D.I. 55, 5/2/17]

Objections Filed:

- A. Omnibus Limited Objection of the Official Committee of Unsecured Creditors to Various Pending Motions and Applications [D.I. 116, 5/31/17]

Status: The Debtors are working with the Committee to resolve its objection, and intend to submit a revised proposed order under Certification of Counsel in advance of the Hearing.

7. Debtors' Motion for an Order Authorizing the Debtors to Continue to (I) Use and Maintain Existing Bank Accounts, (II) Use Their Existing Cash Management System, (III) Use Their Existing Business Forms and (IV) Make Intercompany Transactions [D.I. 8, 5/1/17]

Objection Deadline: May 24, 2017 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors

Related Documents:

- A. Interim Order Authorizing the Debtors to Continue to (I) Use and Maintain Existing Bank Accounts, (II) Use Their Existing Cash Management System, (III) Use Their Existing Business Forms and (IV) Make Intercompany transactions [D.I. 56, 5.2.17]

Objections Filed:

- A. Omnibus Limited Objection of the Official Committee of Unsecured Creditors to Various Pending Motions and Applications [D.I. 116, 5/31/17]

Status: The Debtors are working with the Committee to resolve its objection, and intend to submit a revised proposed order under Certification of Counsel in advance of the Hearing.

- 8. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition General Unsecured Claims in the Ordinary Course of Business, (II) Authorizing Applicable Banks and Other Financial Institutions to Honor and Process Related Checks and Transfers, and (III) Granting Related Relief [D.I. 9, 5/1/17]

Objection Deadline: May 24, 2017 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors

Related Documents:

- A. Interim Order (I) Authorizing Debtors to Pay Certain Prepetition General Unsecured Claims in the Ordinary Course of Business, (II) Authorizing Applicable Banks and Other Financial Institutions to Honor and Process Related Checks and Transfers, and (III) Granting Related Relief [D.I. 57, 5/2/17]

Objections Filed:

- A. Wilmington Trust, National Association, as indenture trustee for the 9.875% Senior Notes Due 2018's Objection to Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition General Unsecured Claims in the Ordinary Course of Business [D.I. 95, 5/24/17]
- B. Omnibus Limited Objection of the Official Committee of Unsecured Creditors to Various Pending Motions and Applications [D.I. 116, 5/31/17]

Status: The Debtors are in discussions with the objecting parties regarding their objections, and hope to resolve certain issues in advance of the hearing. This matter is going forward.

9. Debtors' Motion for Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Financing on an Interim Basis and (B) Utilize Cash Collateral of Pre-Petition Secured Parties on an Interim Basis, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Granting Related Relief Pursuant to 11 U.S.C. Sections 105, 361, 362, 363(c), (d) and (e), 364(c), (d) and (e) and 507(b), and (V) Scheduling a Final Hearing Authorizing Financing on a Final Basis Pursuant to Bankruptcy Rule 4001(b) and (c) [D.I. 10, 5/1/17]

Objection Deadline: May 24, 2017 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors

Related Documents:

- A. Order (I) Authorizing the Debtors to (A) Obtain Financing on an Interim Basis and (B) Utilize Cash Collateral of Prepetition Secured Parties on an Interim Basis, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Granting Related Relief, Pursuant to 11 U.S.C. Sections 105, 361, 362, 363(c), (d) and (e), 364(c), (d) and (e) and 507(b), and (V) Scheduling a Final Hearing Authorizing Financing on a Final Basis Pursuant to Bankruptcy Rule 4001(b) and (c) [D.I. 58, 5/2/17]

Objections Filed:

- A. Objection of the Official Committee of Unsecured Creditors to Debtors' Motion for Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Financing on an Interim Basis and (B) Utilize Cash Collateral of Pre-Petition Secured Parties on an Interim Basis, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Granting Related Relief Pursuant to 11 U.S.C. Sections 105, 361, 362, 363(c), (d) and (e), 364(c), (d) and (e) and 507(b), and (V) Scheduling a Final Hearing Authorizing Financing on a Final Basis Pursuant to Bankruptcy Rule 4001(b) and (c) [D.I. 117, 5/31/17]

Status: The Debtors are in discussions with the Committee regarding the objection, and hope to resolve certain issues in advance of the hearing. This matter is going forward.

10. Debtors' Motion for Entry of an Order Authorizing the Debtors to (I) Employ and Retain AP Services, LLC to Provide Interim Management Services Pursuant to 11 U.S.C. § 363, *Nunc Pro Tunc* to the Petition Date, and (II) Designate Robert D. Albergotti as Chief Restructuring Officer [D.I. 68, 5/6/17]

Objection Deadline: May 24, 2017 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors

Related Documents:

- A. Supplemental Declaration of Robert D. Albergotti of AP Services, LLC [D.I. 101, 5/24/17]

Objections Filed:

- A. Informal Comments of the U.S. Trustee

Status: The U.S. Trustee's informal comments have been resolved subject to documentation, and a revised proposed order will be submitted under Certification of Counsel in advance of the Hearing.

11. Debtors' Application for an Order (I) Authorizing the Retention and Employment of Lazard Frères & Co. LLC and Lazard Middle Market LLC as Investment Banker, Effective as of the Petition Date, and (II) Waiving Certain Information Requirements of Local Rule 2016-2 [D.I. 75, 5/10/17]

Objection Deadline: May 24, 2017 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors

Related Documents: None

Objections Filed:

- A. Omnibus Limited Objection of the Official Committee of Unsecured Creditors to Various Pending Motions and Applications [D.I. 116, 5/31/17]

Status: The Debtors are in discussions with the Committee regarding its objection, and hope to resolve certain issues in advance of the hearing. This matter is going forward.

12. Debtors' Motion for an Order Authorizing the Debtors to Retain, Employ, and Compensate Certain Professionals Utilized in the Ordinary Course of Business, Effective as of the Petition Date [D. I. 77, 5/10/17]

Objection Deadline: May 24, 2017 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors

Related Documents: None

Objections Filed:

- A. Informal comments of the Official Committee of Unsecured Creditors

Status: The Committee's informal comments have been resolved subject to documentation, and a revised proposed order will be submitted under Certification of Counsel in advance of the Hearing.

13. Debtors' Motion for an Order Establishing Procedures for the Sale of Certain Property of De Minimis Value [D.I. 78, 5/10/17]

Objection Deadline: May 24, 2017 at 4:00 p.m. (ET), extended for the Official Committee of Unsecured Creditors

Related Documents: None

Objections Filed:

- A. Informal comments of the U.S. Trustee
- B. Informal comments of the Official Committee of Unsecured Creditors
- C. Informal comments of the Term Loan Agent/2021 Notes Trustee

Status: The responding parties' informal comments have been resolved subject to documentation, and a revised proposed order will be submitted under Certification of Counsel in advance of the Hearing.

Dated: Wilmington, Delaware
June 1, 2017

SHEARMAN & STERLING LLP
Douglas P. Bartner
Fredric Sosnick
Sara Coelho
Stephen M. Blank
599 Lexington Avenue
New York, New York 10022
Telephone: (212) 848-4000
Facsimile: (646) 848-8174

-and-

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ KENNETH J. ENOS

Pauline K. Morgan (No. 3650)
Kenneth J. Enos (No. 4544)
Jaime Luton Chapman (No. 4936)
Rodney Square
1000 North King Street
Wilmington, Delaware 19801
Telephone: (302) 571-6600
Facsimile: (302) 571-1253

Proposed Counsel to the Debtors and Debtors in Possession