

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

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In re: : Chapter 11
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PADDOCK ENTERPRISES, LLC : Case No. 20-10028 (LSS)
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Debtor.¹ :
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**NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR HEARING ON FEBRUARY 12, 2020 AT 11:00 A.M. (ET)**

PLEASE TAKE NOTICE THAT, WITH THE PERMISSION OF THE COURT, THE HEARING HAS BEEN CANCELLED, AS ALL MATTERS SCHEDULED FOR THE HEARING HAVE EITHER BEEN RESOLVED OR CONTINUED

I. CONTINUED MATTERS:

1. Motion of Debtor for Entry of Interim and Final Orders (I) Authorizing Debtor to Maintain Existing Cash Management System, Bank Account, and Business Forms, (II) Authorizing Debtor to Perform Under Services Agreement, and (III) Granting Related Relief [Docket No. 4 – filed January 6, 2020]

Objection / Response Deadline: February 5, 2020 at 4:00 p.m. (ET)

Objections / Responses Received:

- A. Informal comments from the U.S. Trustee

Related Documents:

- i. Interim Order (I) Authorizing Debtor to Maintain Existing Cash Management System, Bank Account, and Business Forms, (II) Authorizing Debtor to Perform Under Services Agreement, and (III) Granting Related Relief [Docket No. 31 – entered January 7, 2020]
- ii. Notice of (A) Entry of Interim Order (I) Authorizing Debtor to Maintain Existing Cash Management System, Bank Account, and Business Forms,

¹ The last four digits of the Debtor’s federal tax identification number are 0822. The Debtor’s mailing address is One Michael Owens Way, Perrysburg, Ohio 43551.

(II) Authorizing Debtor to Perform Under Services Agreement, and (III) Granting Related Relief and (B) Final Hearing Thereon [Docket No. 37 – filed January 7, 2020]

Status: The Debtor is working with counsel to the Official Committee of Asbestos Personal Injury Claimants (the “ACC”) and counsel to the proposed Future Claims Representative (the “FCR”) to address any concerns regarding the Motion. In the event that the Debtor is able to resolve the concerns of the ACC and the FCR, the Debtor intends to submit a consensual form of order under Certification of Counsel. In the event that the Debtor is unable to resolve all concerns, the hearing on the Motion will be continued to March 16, 2020 at 10:30 a.m. (ET).

2. Application of the Debtor for Entry of Order Authorizing the Employment and Retention of Alvarez & Marsal North America, LLC as Financial Advisor to the Debtor Effective as of the Petition Date [Docket No. 54 – filed January 22, 2020]

Objection / Response Deadline: February 5, 2020 at 4:00 p.m. (ET); extended for the Office of the United States Trustee (the “U.S. Trustee”) to March 4, 2020 at 4:00 p.m. (ET)

Objections / Responses Received: None

Related Documents: None

Status: The hearing on this matter is continued to March 16, 2020 at 10:30 a.m. (ET).

3. Motion of Debtor for Entry of Order (I) Authorizing (A) Retention of DJG Services, LLC, and (B) Appointment of David J. Gordon as President and Chief Restructuring Officer, and (II) Granting Related Relief [Docket No. 56 – filed January 22, 2020]

Objection / Response Deadline: February 5, 2020 at 4:00 p.m. (ET); extended for the U.S. Trustee to March 4, 2020 at 4:00 p.m. (ET)

Objections / Responses Received: None

Related Documents: None

Status: The hearing on this matter is continued to March 16, 2020 at 10:30 a.m. (ET).

4. Motion of Debtor for Entry of Order Authorizing Employment and Payment of Professionals Utilized in Ordinary Course of Business [Docket No. 57 – filed January 22, 2020]

Objection / Response Deadline: February 5, 2020 at 4:00 p.m. (ET);
extended for the U.S. Trustee to March 4,
2020 at 4:00 p.m. (ET)

Objections / Responses Received:

- i. Informal comments from the U.S. Trustee

Related Documents: None

Status: The hearing on this matter is continued to March 16, 2020 at 10:30 a.m. (ET).

5. Motion of Debtor for Entry of an Order Appointing James L. Patton, Jr., as Legal Representative for Future Asbestos Claimants, *Nunc Pro Tunc* to the Petition Date [Docket No. 58 – filed January 22, 2020]

Objection / Response Deadline: February 5, 2020 at 4:00 p.m. (ET);
extended for the U.S. Trustee to March 4,
2020 at 4:00 p.m. (ET)

Objections / Responses Received: None

Related Documents: None

Status: The hearing on this matter is continued to March 16, 2020 at 10:30 a.m. (ET).

6. Application for Entry of an Order Authorizing the Proposed Future Claimants' Representative to Retain and Employ Young Conaway Stargatt & Taylor, LLP as His Attorneys, *Nunc Pro Tunc* to the Petition Date [Docket No. 59 – filed January 22, 2020]

Objection / Response Deadline: February 5, 2020 at 4:00 p.m. (ET);
extended for the U.S. Trustee to March 4,
2020 at 4:00 p.m. (ET)

Objections / Responses Received: None

Related Documents: None

Status: The hearing on this matter is continued to March 16, 2020 at 10:30 a.m. (ET).

7. Application of Debtor for Entry of Order Authorizing Employment and Retention of Latham & Watkins LLP as Bankruptcy Co-Counsel Effective as of the Petition Date [Docket No. 60 – filed January 22, 2020]

Objection / Response Deadline: February 5, 2020 at 4:00 p.m. (ET);
extended for the U.S. Trustee to March 4,
2020 at 4:00 p.m. (ET)

Objections / Responses Received: None

Related Documents: None

Status: The hearing on this matter is continued to March 16, 2020 at 10:30 a.m.
(ET).

8. Application of Debtor to Retain and Employ Richards, Layton & Finger, P.A. as Co-Counsel *Nunc Pro Tunc* to the Petition Date [Docket No. 61 – filed January 22, 2020]

Objection / Response Deadline: February 5, 2020 at 4:00 p.m. (ET);
extended for the U.S. Trustee to March 4,
2020 at 4:00 p.m. (ET)

Objections / Responses Received: None

Related Documents: None

Status: The hearing on this matter is continued to March 16, 2020 at 10:30 a.m.
(ET).

II. MATTERS WITH CERTIFICATIONS:

9. Motion of Debtor for Entry of Interim and Final Orders (I) Authorizing the Filing of a List of the Top 24 Law Firms Representing Asbestos Claimants, (II) Approving Certain Notice Procedures for Asbestos Claimants, and (III) Granting Related Relief [Docket No. 3 – filed January 6, 2020]

Objection / Response Deadline: February 5, 2020 at 4:00 p.m. (ET)

Objections / Responses Received: None

Related Documents:

- i. Interim Order (I) Authorizing the Filing of a List of the Top 24 Law Firms Representing Asbestos Claimants, (II) Approving Certain Notice Procedures for Asbestos Claimants, and (III) Granting Related Relief [Docket No. 32 – entered January 7, 2020]

- ii. Notice of (A) Entry of Interim Order (I) Authorizing the Filing of a List of the Top 24 Law Firms Representing Asbestos Claimants, (II) Approving Certain Notice Procedures for Asbestos Claimants, and (III) Granting Related Relief and (B) Final Hearing Thereon [Docket No. 36 – filed January 7, 2020]
- iii. Certificate of No Objection Regarding Motion of Debtor for Entry of Interim and Final Orders (I) Authorizing the Filing of a List of the Top 24 Law Firms Representing Asbestos Claimants, (II) Approving Certain Notice Procedures for Asbestos Claimants, and (III) Granting Related Relief [Docket No. 83 – filed February 10, 2020]

Status: The Debtor filed a Certification of No Objection with regards to the Motion. Accordingly, there is no need for a hearing except to the extent that the Court has questions regarding the Motion. To the extent that the Court does have questions regarding the Motion, the hearing on the Motion will be continued to March 16, 2020 at 10:30 a.m. (ET).

- 10. Motion of Debtor for Entry of Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals and (II) Granting Related Relief [Docket No. 52 – filed January 22, 2020]

Objection / Response Deadline: February 5, 2020 at 4:00 p.m. (ET)

Objections / Responses Received:

- A. Informal comments from the U.S. Trustee

Related Documents:

- i. Certification of Counsel Regarding Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals and (II) Granting Related Relief [Docket No. 86 – filed February 10, 2020]

Status: The Debtor has resolved the informal comments of the U.S. Trustee and has submitted a consensual form of order under Certification of Counsel. Accordingly, a hearing on this matter is only necessary to the extent that the Court has questions regarding the proposed form or order. To the extent that the Court does have questions regarding the proposed form of order, the hearing on the Motion will be continued to March 16, 2020 at 10:30 a.m. (ET).

- 11. Motion of Debtor for Entry of Order Extending Time for Filing Schedules and Statements [Docket No. 53 – filed January 22, 2020]

Objection / Response Deadline: February 5, 2020 at 4:00 p.m. (ET)

Objections / Responses Received:

A. Informal comments from the U.S. Trustee

Related Documents:

i. Certification of Counsel Regarding Order Extending Time for Filing Schedules and Statements [Docket No. 84 – filed February 10, 2020]

Status: The Debtor has resolved the informal comments of the U.S. Trustee and has submitted a consensual form of order under Certification of Counsel. Accordingly, a hearing on this matter is only necessary to the extent that the Court has questions regarding the proposed form or order. To the extent that the Court does have questions regarding the proposed form of order, the hearing on the Motion will be continued to March 16, 2020 at 10:30 a.m. (ET).

12. Application of Debtor for Entry of Order Authorizing Employment and Retention of Prime Clerk LLC as Administrative Advisor Effective as of the Petition Date [Docket No. 55 – filed January 22, 2020]

Objection / Response Deadline: February 5, 2020 at 4:00 p.m. (ET)

Objections / Responses Received:

A. Informal comments from the U.S. Trustee

Related Documents:

i. Certificate of No Objection Regarding Application of Debtor for Entry of Order Authorizing Employment and Retention of Prime Clerk LLC as Administrative Advisor Effective as of the Petition Date [Docket No. 85 – filed February 10, 2020]

Status: The Debtor has resolved the informal comments of the U.S. Trustee, which did not result in any modifications of the proposed form or order. Accordingly, the Debtor has filed a Certificate of No Objection with regards to the Application. Accordingly, a hearing on this matter is only necessary to the extent that the Court has questions regarding the proposed form or order. To the extent that the Court does have questions regarding the proposed form of order, the hearing on the Application will be continued to March 16, 2020 at 10:30 a.m. (ET).

Dated: February 10, 2020
Wilmington, Delaware

Respectfully Submitted,

/s/ Brendan J. Schlauch

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