

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

*In re*

PATRIOT NATIONAL, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 18-10189 (KG)

(Jointly Administered)

Re: Docket No. 298

**AMENDED<sup>2</sup> NOTICE OF AGENDA FOR HEARING ON MARCH 8, 2018, AT 10:00 A.M. (PREVAILING EASTERN TIME), BEFORE THE HONORABLE KEVIN GROSS AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, LOCATED AT 824 NORTH MARKET STREET, 6TH FLOOR, COURTROOM NO. 3, WILMINGTON, DELAWARE 19801<sup>3</sup>**

**CONTINUED MATTER:**

1. Debtors' Motion for Entry of an Order (I) Approving the Proposed Disclosure Statement and Form and Manner of Notice of Disclosure Statement Hearing, (II) Establishing Solicitation and Voting Procedures, (III) Scheduling Confirmation Hearing, and (IV) Establishing Notice and Objection Procedures for Confirmation of the Proposed Plan Pursuant to Sections 105, 502, 1125, 1126, and 1128 of the Bankruptcy Code, Bankruptcy Rules 2002, 3003, 3017, 3018, 3020 and 9006 and Local Rules 2002-1, 3017-1, and 9006-1 [Filed: 1/31/18] (Docket No. 17).

**Response Deadline:** March 1, 2018, at 4:00 p.m. ET (extended until March 5, 2018 at 4:00 p.m. ET for the Official Committee of Unsecured Creditors (the "Committee") and the Ullico Casualty Company In Liquidation and until March 6, 2018 at 4:00 p.m. ET for the Office of the United States Trustee (the "UST"))

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtors' federal tax identification number, are: Patriot National, Inc. (1376), Patriot Services, LLC (1695); TriGen Insurance Solutions, Inc. (2501); Patriot Captive Management, LLC (2341); Patriot Underwriters, Inc. (0045); TriGen Hospitality Group, Inc. (6557); Patriot Risk Consultants, LLC (0844); Patriot Audit Services, LLC (5793); Patriot Claim Services, Inc. (9147); Patriot Risk Services, Inc. (7189); Corporate Claims Management, Inc. (6760); CWIBenefits, Inc. (0204); Forza Lien, LLC (7153); Contego Investigative Services, Inc. (0330); Contego Services Group, LLC (0012); Patriot Care Management, LLC (2808); Radar Post-Closing Holding Company, Inc. (2049); Patriot Technology Solutions, LLC (6855); and Decision UR, LLC (1826). The Debtors' headquarters are located at 401 East Las Olas Boulevard, Suite 1650, Fort Lauderdale, Florida 33301.

<sup>2</sup> **Amended items are in bold.**

<sup>3</sup> 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).

Responses Received:

- a. Objection of Aspen Specialty Insurance Company to Adequacy of Debtors' Disclosure Statement [Filed: 3/1/18] (Docket No. 260).
- b. Objection of Aric McIntire and Henry Wasik to the Debtors' Motion to Approve the Disclosure Statement [Filed: 3/1/18] (Docket No. 263).
- c. Receiver of Ullico Casualty Company in Liquidation's Objection to Debtors' Motion for Entry of an Order (I) Approving the Proposed Disclosure Statement and Form and Manner of Notice of Disclosure Statement Hearing, (II) Establishing Solicitation and Voting Procedures, (III) Scheduling Confirmation Hearing, and (IV) Establishing Notice and Objection Procedures for Confirmation of the Proposed Plan Pursuant to Sections 105, 502, 1125, 1126, and 1128 of the Bankruptcy Code, Bankruptcy Rules 2002, 3003, 3017, 3018, 3020 and 9006 and Local Rules 2002-1, 3017-1, and 9006-1 [Filed: 3/5/18] (Docket No. 286).
- d. Objection of the Official Committee of Unsecured Creditors to Debtors' Motion for Entry of an Order (I) Approving the Proposed Disclosure Statement and Form and Manner of Notice of Disclosure Statement Hearing, (II) Establishing Solicitation and Voting Procedures, (III) Scheduling Confirmation Hearing, and (IV) Establishing Notice and Objection Procedures for Confirmation of the Proposed Plan Pursuant to Sections 105, 502, 1125, 1126, and 1128 of the Bankruptcy Code, Bankruptcy Rules 2002, 3003, 3017, 3018, 3020 and 9006 and Local Rules 2002-1, 3017-1, and 9006-1 [Filed: 3/5/18] (Docket No. 287).
- e. **United States Trustee's Objection to Debtors' Motion for Entry of an Order (I) Approving the Proposed Disclosure Statement and Form and Manner of Notice of Disclosure Statement Hearing, (II) Establishing Solicitation and Voting Procedures, (III) Scheduling Confirmation Hearing, and (IV) Establishing Notice and Objection Procedures for Confirmation of the Proposed Plan Pursuant to Sections 105, 502, 1125, 1126, and 1128 of the Bankruptcy Code, Bankruptcy Rules 2002, 3003, 3017, 3018, 3020 and 9006 and Local Rules 2002-1, 3017-1, and 9006-1 [Filed: 3/6/18] (Docket No. 301).**
- f. **Joinder of Mbago Kaniki to Objection of the Official Committee of Unsecured Creditors to Debtors' Motion for Entry of an Order (I) Approving the Proposed Disclosure Statement and Form and Manner of Notice of Disclosure Statement Hearing, (II) Establishing Solicitation and Voting Procedures, (III) Scheduling Confirmation Hearing, and (IV) Establishing Notice and Objection Procedures for Confirmation of the Proposed Plan Pursuant to Sections 105, 502, 1125, 1126, and 1128 of the Bankruptcy Code, Bankruptcy Rules 2002, 3003, 3017, 3018, 3020 and 9006 and Local Rules 2002-1, 3017-1, and 9006-1 [Filed: 3/6/18] (Docket No. 306).**

Related Documents:

- a. Debtors' Joint Chapter 11 Joint Plan of Reorganization [Filed: 1/30/18] (Docket No. 15).
- b. Disclosure Statement of Patriot National, Inc., and Its Affiliated Debtors [Filed: 1/31/18] (Docket No. 16).
- c. [Proposed] Order (I) Approving the Proposed Disclosure Statement and Form and Manner of Notice of Disclosure Statement Hearing, (II) Establishing Solicitation and Voting Procedures, (III) Scheduling Confirmation Hearing, and (IV) Establishing Notice and Objection Procedures for Confirmation of the Proposed Plan Pursuant to Sections 105, 502, 1125, 1126, and 1128 of the Bankruptcy Code, Bankruptcy Rules 2002, 3003, 3017, 3018, 3020 and 9006 and Local Rules 2002-1, 3017-1, and 9006-1 [Filed: 1/31/18] (Docket No. 17, Exhibit A).
- d. Notice of Hearing to Consider Approval of Debtors' Proposed Disclosure Statement for Debtors' Chapter 11 Plan [Filed: 2/1/18] (Docket No. 64).
- e. Notice of Hearing Regarding Debtors' Motion for Entry of an Order (I) Approving the Proposed Disclosure Statement and Form and Manner of Notice of Disclosure Statement Hearing, (II) Establishing Solicitation and Voting Procedures, (III) Scheduling Confirmation Hearing, and (IV) Establishing Notice and Objection Procedures for Confirmation of the Proposed Plan Pursuant to Sections 105, 502, 1125, 1126, and 1128 of the Bankruptcy Code, Bankruptcy Rules 2002, 3003, 3017, 3018, 3020 and 9006 and Local Rules 2002-1, 3017-1, and 9006-1 [Filed: 2/6/18] (Docket No. 84).
- f. Amended Disclosure Statement of Patriot National, Inc., and Its Affiliated Debtors [Filed: 3/1/18] (Docket No. 261).
- g. Notice of Filing of Blackline of Amended Disclosure Statement of Patriot National, Inc., and Its Affiliated Debtors [Filed: 3/1/18] (Docket No. 262).
- h. Notice of Rescheduled Hearing Regarding Debtors' Motion for Entry of an Order (I) Approving the Proposed Disclosure Statement and Form and Manner of Notice of Disclosure Statement Hearing, (II) Establishing Solicitation and Voting Procedures, (III) Scheduling Confirmation Hearing, and (IV) Establishing Notice and Objection Procedures for Confirmation of the Proposed Plan Pursuant to Sections 105, 502, 1125, 1126, and 1128 of the Bankruptcy Code, Bankruptcy Rules 2002, 3003, 3017, 3018, 3020 and 9006 and Local Rules 2002-1, 3017-1, and 9006-1 [Filed: 3/5/18] (Docket No. 294).

Status: This matter is continued to March 12, 2018 at 1:00 p.m. ET.

**MATTERS GOING FORWARD:**

2. Debtors' Motion for Interim and Final Orders (I) Authorizing the Continued Use of Cash Management System, Bank Accounts and Business Forms, (II) Extending the Debtors' Time to Comply With Section 345(b) of the Bankruptcy Code, (III) Approving Continuation of Ordinary Course Intercompany Transactions and (IV) Granting Related Relief [Filed: 1/30/18] (Docket No. 7).

Response Deadline: February 21, 2018, at 4:00 p.m. ET (extended until February 26, 2018 at 10:30 a.m. ET for UST and the Committee)

Responses Received: Informal comments from the UST.

- a. Receiver of Ullico Casualty Company In Liquidation's Limited Objection to Debtors' Motion for Interim and Final Orders (I) Authorizing the Continued Use of Cash Management System, Bank Accounts and Business Forms, (II) Extending the Debtors' Time to Comply With Section 345(b) of the Bankruptcy Code, (III) Approving Continuation of Ordinary Course Intercompany Transactions and (IV) Granting Related Relief [Filed: 2/21/18] (Docket No. 138).
- b. Omnibus Reservation of Rights of the Official Committee of Unsecured Creditors [Filed: 2/26/18] (Docket No. 164).

Related Documents:

- a. [Proposed] Final Order (I) Authorizing the Continued Use of Cash Management System, Bank Accounts and Business Forms, (II) Extending the Debtors' Time to Comply With Section 345(b) of the Bankruptcy Code, (III) Approving Continuation of Ordinary Course Intercompany Transactions and (IV) Granting Related Relief [Filed: 1/30/18] (Docket No. 7, Exhibit B).
- b. [Signed] Interim Order (I) Authorizing the Continued Use of Cash Management System, Bank Accounts and Business Forms, (II) Extending the Debtors' Time to Comply With Section 345(b) of the Bankruptcy Code, (III) Approving Continuation of Ordinary Course Intercompany Transactions and (IV) Granting Related Relief [Filed: 2/1/18] (Docket No. 50).
- c. Notice of Entry of Interim Order and Final Hearing Regarding Debtors' Motion for Interim and Final Orders (I) Authorizing the Continued Use of Cash Management System, Bank Accounts and Business Forms, (II) Extending the Debtors' Time to Comply With Section 345(b) of the Bankruptcy Code, (III) Approving Continuation of Ordinary Course Intercompany Transactions and (IV) Granting Related Relief [Filed: 2/2/18] (Docket No. 73).
- d. Declaration of James S. Feltman, Chief Restructuring Officer of Patriot National, Inc., in Further Support of Certain First Day Motions [Filed: February 27, 2018] (Docket No. 201).

Status: This matter will go forward on an interim basis.

3. Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing Debtors to Continue Their Prepetition Practices With Respect to Their Pass-Through Bank Account and (B) Directing Banks to Honor Related Transfers [Filed: 1/30/18] (Docket No. 12).

Response Deadline: February 21, 2018, at 4:00 p.m. ET (extended until February 26, 2018 at 10:30 a.m. ET for UST and the Committee)

Responses Received:

- a. Declaration of Leonard D. Lerner, Counsel for IPFS Corporation of California d/b/a IPFS Corporation in Response to Debtors' Motion Authorizing Debtors to Continue Their Prepetition Practices With Respect to Their Pass-Through Bank Account [Filed: 2/21/18] (Docket No. 134).
- b. Receiver of Ullico Casualty Company in Liquidation's Limited Objection to Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing Debtors to Continue Their Prepetition Practices With Respect to Their Pass-Through Bank Account and (B) Directing Banks to Honor Related Transfers [Filed: 2/21/18] (Docket No. 140).
- c. Omnibus Reservation of Rights of the Official Committee of Unsecured Creditors [Filed: 2/26/18] (Docket No. 164).

Related Documents:

- a. [Proposed] Final Order (A) Authorizing Debtors to Continue Their Prepetition Practices With Respect to Their Pass-Through Bank Account and (B) Directing Banks to Honor Related Transfers [Filed: 1/30/18] (Docket No. 12, Exhibit B).
- b. [Signed] Interim Order (A) Authorizing Debtors to Continue Their Prepetition Practices With Respect to Their Pass-Through Bank Account and (B) Directing Banks to Honor Related Transfers [Filed: 2/1/18] (Docket No. 55).
- c. Notice of Entry of Interim Order and Final Hearing Regarding Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing Debtors to Continue Their Prepetition Practices With Respect to Their Pass-Through Bank Account and (B) Directing Banks to Honor Related Transfers [Filed: 2/2/18] (Docket No. 74).
- d. Declaration of James S. Feltman, Chief Restructuring Officer of Patriot National, Inc., in Further Support of Certain First Day Motions [Filed: February 27, 2018] (Docket No. 201).

Status: This matter will go forward on an interim basis.

4. Debtors' Motion for an Order (I) Establishing Bar Dates for Filing Proofs of Claim, (II) Approving Proof of Claim Form, Bar Date Notices, and Mailing and Publication Procedures, (III) Implementing Uniform Procedures Regarding 503(b)(9) Claims, and (IV) Providing Certain Supplemental Relief [Filed: 2/7/18] (Docket No. 86).

Response Deadline: February 21, 2018, at 4:00 p.m. ET (extended until February 26, 2018 at 10:30 a.m. ET for the UST and the Committee)

Responses Received: Informal comments from the UST.

Related Documents:

- a. [Proposed] Order (I) Establishing Bar Dates for Filing Proofs of Claim, (II) Approving Proof of Claim Form, Bar Date Notices, and Mailing and Publication Procedures, (III) Implementing Uniform Procedures Regarding 503(b)(9) Claims, and (IV) Providing Certain Supplemental Relief [Filed: 2/7/18] (Docket No. 86, Exhibit D).

Status: This matter will go forward.

5. Debtors' Motion for Entry of an Order Pursuant to Sections 105(a), 327, 328 and 330 of the Bankruptcy Code, Bankruptcy Rule 2014 and Local Rule 2014-1 Authorizing the Debtors to Employ Professionals Used in the Ordinary Course of Business *Nunc Pro Tunc* to the Petition Date [Filed: 2/7/18] (Docket No. 90).

Response Deadline: February 21, 2018, at 4:00 p.m. ET (extended until February 26, 2018 at 10:30 a.m. ET for UST and the Committee).

Responses Received: Informal comments from the UST and the Committee.

Related Documents:

- a. [Proposed] Order Pursuant to Sections 105(a), 327, 328 and 330 of the Bankruptcy Code, Bankruptcy Rule 2014 and Local Rule 2014-1 Authorizing the Debtors to Employ Professionals Used in the Ordinary Course of Business *Nunc Pro Tunc* to the Petition Date [Filed: 2/7/18] (Docket No. 90, Exhibit A).

Status: This matter will go forward. The Debtors are working to resolve this matter. If resolved, the Debtors will submit an order prior to or at the hearing.

6. Debtors' Second Omnibus Motion for Entry of an Order Authorizing Them to Reject Certain Executory Contracts and Unexpired Leases *Nunc Pro Tunc* to the Rejection Date [Filed: 2/7/18] (Docket No. 91).

Response Deadline: February 21, 2018, at 4:00 p.m. ET (extended until February 26, 2018 at 10:30 a.m. ET for UST and the Committee)

Responses Received: Informal comments from the Committee and Cisco Systems Capital Corporation.

- a. MSA Administrators, LLC Response to Debtors' Second Omnibus Motion for Entry of an Order Authorizing Them to Reject Certain Executory Contracts and Unexpired Leases *Nunc Pro Tunc* to the Rejection Date [Filed: 2/21/18] (Docket No. 130).
- b. **Receiver of Ullico Casualty Company in Liquidation's Objection to Debtors' Second Omnibus Motion for Entry of an Order Authorizing Them to Reject Certain Executory Contracts and Unexpired Leases *Nunc Pro Tunc* to the Rejection Date [Filed: 3/6/18] (Docket No. 305).**

Related Documents:

- a. [Proposed] Second Omnibus Order Authorizing the Rejection of Certain Executory Contracts and Unexpired Leases *Nunc Pro Tunc* to the Rejection Date [Filed: 2/7/18] (Docket No. 91, Exhibit A).

**Status: This matter is continued solely as to Cisco Systems Capital Corporation to the next omnibus hearing date to be scheduled. The Debtors have revised the proposed order to incorporate comments from MSA Administrators, LLC, and the Debtors are no longer seeking relief as to Ullico Casualty Company. This matter will go forward as to all other executory contracts and unexpired leases listed in the motion.**

7. Motion for an Order Shortening Notice with Respect to Motion to Certify Class, Appoint Class Representatives and Appoint Class Counsel [Filed: 3/2/18] (Docket No. 280).

Response Deadline: March 8, 2018, at 10:00 a.m. ET

Responses Received:

- a. Debtors' Objection to Motion for an Order Shortening Notice with Respect to Motion to Certify Class, Appoint Class Representatives and Appoint Class Counsel [Filed: 3/5/18] (Docket No. 283).

Replies Received:

- a. Reply in Support of Motion for an Order Shortening Notice with Respect to Motion to Certify Class, Appoint Class Representatives and Appoint Class Counsel [Filed: 3/5/18] (Docket No. 290).

Related Documents:

- a. [Proposed] Order Granting Motion to Shorten Notice with Respect to Class Action Plaintiffs' Motion to Certify Class, Appoint Class Representatives and

Appoint Class Counsel [Filed: 3/2/18] (Docket No. 280).

- b. Motion of Class Action Plaintiffs' Motion to Certify Class, Appoint Class Representatives and Appoint Class Counsel [Filed: 3/2/18] (Docket No. 279).
  - (i) Brief in Support of Class Action Plaintiffs' Motion to Certify Class, Appoint Class Representatives and Appoint Class Counsel [Filed: 3/2/18] (Docket No. 279).
  - (ii) [Proposed] Order Granting Class Action Plaintiffs' Motion to Certify Class, Appoint Class Representatives and Appoint Class Counsel [Filed: 3/2/18] (Docket No. 279).
- c. Notice of Hearing Regarding Motion for an Order Shortening Notice with Respect to Motion of Class Action Plaintiffs' Motion to Certify Class, Appoint Class Representatives and Appoint Class Counsel [Filed: 3/5/18] (Docket No. 293).

Status: This matter will go forward on the motion to shorten.



Dated: March 7, 2018  
Wilmington, Delaware

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Peter J. Keane

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