

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

|  |   |                             |
|--|---|-----------------------------|
| <b>IN RE:</b>                                  | § |                             |
| <b>SH 130 CONCESSION COMPANY, LLC</b>          | § | <b>CASE NO. 16-10262</b>    |
| <b>ZACHRY TOLL ROAD – 56 LP</b>                | § | <b>CASE NO. 16-10263</b>    |
| <b>CINTRA TX 56 LLC</b>                        | § | <b>CASE NO. 16-10264</b>    |
|  | § |                             |
| <b>DEBTORS.</b>                                | § | <b>CHAPTER 11</b>           |
|  | § |                             |
| <b>EIN: 20-8490258; 20-8596022; 20-8059105</b> | § |                             |
|  | § |                             |
| <b>10800 N US 183 HWY</b>                      | § | <i>JOINT ADMINISTRATION</i> |
| <b>BUDA, TEXAS 78610-9460</b>                  | § | <i>REQUESTED</i>            |

**NOTICE OF EMERGENCY HEARINGS ON DEBTORS’ FIRST DAY MOTIONS**

**PLEASE TAKE NOTICE** that the following matters have been scheduled for hearing on **March 4, 2016 at 1:30 p.m.** on the matters listed below before the Honorable Tony M. Davis at the United States Bankruptcy Courthouse, Austin Courtroom 1, Homer J. Thornberry Federal Building, 903 San Jacinto, Austin, Texas 78701:

- Motion for an Order Authorizing Joint Administration [Dckt. No. 2]
- Motion for Entry of an Order Limiting Notice and Establishing Notice Procedures [Dckt. No. 3]
- Notice of Designation as Complex Chapter 11 Bankruptcy Case [Dckt. No. 4]
- Motion to Extend Time to File Schedules and Statement of Financial Affairs [Dckt. No. 6]
- Motion for Entry of an Order (A) Waiving the Requirement that Each Debtor File and Upload a List of Creditors; and (B) Authorizing the Filing of a Consolidated List of Top 20 Unsecured Creditors [Dckt. No. 9]
- Motion for Entry of an Order (a) Authorizing Debtors to Continue Using Existing Cash Management System Bank Accounts, and Business Forms, (b) Authorizing Debtors’ Banks to Honor All Related Payment Requests; and (c) Scheduling a Final Hearing [Dckt. No. 11]

- Motion for Entry of an Order (A) Authorizing the Debtors to Pay Materialmen & Mechanic Contractors in the Ordinary Course and (B) Granting Related Relief [Dckt. No. 12]
- Motion for Entry of an Order (a) Authorizing the Debtors to Continue Prepetition Insurance Programs and Insurance Policies, (b) Authorizing the Debtors to Pay any Prepetition Premiums and Related Obligations, and (c) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers [Dckt. No. 13]
- Motion for Entry of Interim and Final Orders, (a) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Utility Services to, or Discriminating Against, the Debtors on Account Prepetition Invoices; (b) Determining that the Utility Companies Are Adequately Assured of Future Payment; (c) Establishing Procedures for Determining Requests for Additional Assurance; (d) Permitting Utility Companies to Object to Such Procedures; and (e) Scheduling a Final Hearing [Dckt. No. 14]
- Motion for Entry of Interim and Final Orders (a) Authorizing the Debtors to Pay Certain Prepetition Wages and Reimbursable Employee Expenses, (b) Authorizing the Debtors to Pay and Honor Medical and Similar Benefits, (c) Authorizing the Debtors to Continue Employee Compensation and Employee Benefits Programs, and (d) Scheduling a Final Order [Dckt. No. 15]
- Emergency Motion For Entry of Interim and Final Orders (A) Authorizing the Use of Cash Collateral, (B) Granting Adequate Protection, (C) Modifying the Automatic Stay, and (D) Scheduling a Final Hearing [Dckt. No. 16]
- Application for Appointment of Prime Clerk LLC as Claims, Noticing and Balloting Agent Nunc Pro Tunc to the Petition Date [Dckt. No. 17]

Dated: March 2, 2016

Respectfully submitted,

David M. Feldman (*pro hac vice* pending)  
Matthew K. Kelsey (*pro hac vice* pending)  
Alan Moskowitz (*pro hac vice* pending)  
Matthew G. Bouslog (*pro hac vice* pending)  
GIBSON, DUNN & CRUTCHER LLP  
200 Park Avenue  
New York, New York 10166-0193  
Telephone: (212) 351-4000  
Facsimile: (212) 351-4035  
Email address: [DFeldman@gibsondunn.com](mailto:DFeldman@gibsondunn.com)  
Email address: [MKelsey@gibsondunn.com](mailto:MKelsey@gibsondunn.com)  
Email address: [AMoskowitz@gibsondunn.com](mailto:AMoskowitz@gibsondunn.com)  
Email address: [MBouslog@gibsondunn.com](mailto:MBouslog@gibsondunn.com)

JACKSON WALKER L.L.P.  
100 Congress Ave., Suite 1100  
Austin, Texas 78701  
(512) 236-2000  
(512) 236-2002 - FAX

By: /s/ Jennifer F. Wertz  
Patricia B. Tomasco  
State Bar No. 01797600  
(512) 236-2076 – Direct Phone  
(512) 691-4438 – Direct Fax  
Email address: [ptomasco@jw.com](mailto:ptomasco@jw.com)

Jennifer F. Wertz  
State Bar No. 24072822  
(512) 236-2247 – Direct Phone  
(512) 391-2147 – Direct Fax  
Email address: [jwertz@jw.com](mailto:jwertz@jw.com)

**PROPOSED COUNSEL FOR THE  
DEBTORS**