

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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 In re: : Chapter 11
 TRUMP ENTERTAINMENT RESORTS, INC., et al.,¹ : Case No. 14-12103 (KG)
 Debtors. : Jointly Administered
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SECOND AMENDED² NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR HEARING ON MARCH 12, 2015 AT 11:00 A.M. (ET)³

UNCONTESTED MATTERS GOING FORWARD

1. Debtors’ Motion for Entry of an Order, Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rule 9019, Approving Settlement By and Among the Debtors and Levine Staller [D.I. 1017, 3/2/15]

Response Deadline: March 11, 2015 at 12:00 p.m. (ET)

Responses Received: None.

Related Documents:

- A. Motion to Shorten [D.I. 1019, 3/2/15]
- B. Order Granting Motion to Shorten [D.I. 1031, 3/3/15]

Status: This matter will be going forward.

2. Debtors’ Application for an Order, Pursuant to Section 327(e) of the Bankruptcy Code, Authorizing the Retention and Employment of Levine, Staller, Sklar, Chan & Brown, P.A. as Real Estate Tax Appellate Counsel to the Debtors, *Nunc Pro Tunc* to the Entry of the 9019 Order [D.I. 1018, 3/2/15]

Response Deadline: March 11, 2015 at 12:00 p.m. (ET)

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Trump Entertainment Resorts, Inc. (8402), Trump Entertainment Resorts Holdings, L.P. (8407), Trump Plaza Associates, LLC (1643), Trump Marina Associates, LLC (8426), Trump Taj Mahal Associates, LLC (6368), Trump Entertainment Resorts Development Company, LLC (2230), TER Development Co., LLC (0425), and TERH LP Inc. (1184). The mailing address for each of the Debtors is 1000 Boardwalk at Virginia Avenue, Atlantic City, NJ 08401.

² **Amendments indicated in bold.**

³ The start time of this hearing has been changed from 9:00 a.m. (ET) to 11:00 a.m. (ET).

Responses Received: None.

Related Documents:

- A. Motion to Shorten [D.I. 1019, 3/2/15]
(DOCUMENT LOCATED UNDER TAB 1A)
- B. Order Granting Motion to Shorten [D.I. 1031, 3/3/15]
(DOCUMENT LOCATED UNDER TAB 1B)

Status: This matter will be going forward.

- 3. Debtors' Motion for Entry of an Order, Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rule 9019, Approving Settlement By and Among the Debtors, the Trump Parties, and the First Lien Parties [D.I. 1073, 3/9/15]

Response Deadline: March 12, 2015 at 8:00 a.m. (ET)

Responses Received: None.

Related Documents:

- A. Motion to Shorten [D.I. 1074, 3/9/15]
- B. Order Granting Motion to Shorten [D.I. 1080, 3/9/15]

Status: This matter will be going forward.

CONTESTED MATTERS GOING FORWARD

- 4. Motion of Hard Rock Cafe International (STP), Inc. to Compel Assumption or Rejection of Lease Agreement Between Hard Rock Cafe International (STP), Inc. and Trump Taj Mahal Associates [D.I. 540, 11/21/14]

Response Deadline: December 5, 2014 at 4:00 p.m. (ET)

Responses Received:

- A. Objection of the Debtors [D.I. 602, 12/5/14]

Related Documents:

- B. Re-Notice of Hearing [D.I. 581, 12/2/14]

Status: This matter will be withdrawn subject to confirmation of the plan.

5. Debtors' Motion for Entry of an Order, Pursuant to Sections 105(a) and 365(a) of the Bankruptcy Code, Authorizing the Debtors to Reject Certain Energy Service Agreements With Thermal Energy, Effective as of the Rejection Effective Date [D.I. 954, 2/20/15]

Response Deadline: March 5, 2015 at 4:00 p.m. (ET); Extended to March 9, 2015 at 12:00 p.m. (ET) for Thermal Energy

Responses Received:

- A. Informal Objection of Thermal Energy

Related Documents: None.

Status: The Debtors and Thermal Energy have reached an agreement that resolves the informal objection and claims asserted by Thermal Energy. The Debtors will present a revised form of order approving the motion at the hearing. This matter will be going forward.

6. Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Assume Certain Unexpired Leases of Non-Residential Real Property Pursuant to Section 365 of the Bankruptcy Code and (II) Fixing of Cure Amounts With Respect Thereto [D.I. 955, 2/20/15]

Response Deadline: March 5, 2015 at 12:00 p.m. (ET)

Responses Received:

- A. Limited Objection of Exempt Trust U/W of Ellsworth Steinberg Trust [D.I. 1052, 3/5/15]

Related Documents:

- B. Certification of Counsel Regarding Proposed Order Further Extending the Time Within Which the Debtors Must Assume or Reject a Certain Unexpired Lease of Nonresidential Real Property With the Prior Written Consent of the Lessor Under Such Lease [D.I. 1103, 3/11/15]**

Status: The Debtors **have resolved the response through the proposed order that is the subject of the Certification of Counsel filed at Item B above. As a result of this resolution, the Debtors are no longer seeking to assume the lease that is the subject of the response at this time.** This matter will be going forward.

7. Certification of Counsel Regarding Proposed Order Further Extending the Time Within Which the Debtors Must Assume or Reject a Certain Unexpired Lease of Nonresidential Real Property With the Prior Written Consent of the Lessor Under Such Lease [D.I. 972, 2/24/15]

Response Deadline: March 5, 2015 at 11:00 a.m. (ET)

Responses Received:

- A. Preliminary Objection of Donald J. Trump and Notice of Intent to Oppose Entry of Proposed Order [D.I. 973, 2/24/15]
- B. Supplemental Objection of Donald J. Trump [D.I. 1026, 3/2/15]
- C. Limited Response of R&R Associates [D.I. 1029, 3/3/15]

Related Documents:

- D. Scheduling Order [D.I. 999, 2/26/15]⁴
- E. Debtors' Statement in Further Support of Certification of Counsel and Response to Objection of Donald J. Trump [D.I. 1050, 3/5/15]

Status: The Debtors have entered into a settlement agreement with Mr. Trump (Item #3 above) which, subject to court approval, will resolve this matter. This matter will be going forward.

8. Debtors' Third Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code as Modified [D.I. 993, 2/25/15]

Response Deadline With Respect to Confirmation: March 4, 2015 at 4:00 p.m. (ET);
Extended to March 9, 2015 at 12:00 p.m. (ET) for the U.S. Trustee and the United States and March 10, 2015 at 10:00 a.m. (ET) for the National Retirement Fund

Responses Received With Respect to Confirmation:

- A. Objection of IGT [D.I. 1020, 3/2/15]
- B. Objection of International Painters and Allied Trades Industry Pension Fund [D.I. 1042, 3/4/15]

⁴ Subsequent to its entry, the Scheduling Order was modified by the Court.

- C. Limited Objection and Reservation of Rights of Horizon Healthcare Services, Inc. d/b/a Horizon Blue Cross Blue Shield of New Jersey [D.I. 1046, 3/4/15]
- D. Objection of the United States Trustee [D.I. 1072, 3/9/15]
- E. Objection of the National Retirement Fund [D.I. 1084, 3/10/15]

Response Deadline With Respect to Cure Amounts: March 3, 2015 at 4:00 p.m. (ET);
Extended to March 5, 2015 at 4:00
p.m. (ET) for Exempt Trust U/W of
Ellsworth Steinberg Trust

Responses Received With Respect to Cure Amounts:

- F. Limited Objection of Sysco Philadelphia, LLC [D.I. 1022, 3/2/15]
- G. Objection of IGT [D.I. 1023, 3/2/15]
- H. Objection of R&R Associates [D.I. 1036, 3/3/15]
- I. Limited Objection and Reservation of Rights of PX NJ Concessions, LLC d/b/a Panda Express [D.I. 1038, 3/3/15]
- J. Preliminary Objection of Donald J. Trump [D.I. 1040, 3/3/15]
- K. Objection of Trump AC Casino Marks, LLC [D.I. 1041, 3/3/15]
- L. Limited Objection of Exempt Trust U/W of Ellsworth Steinberg Trust [D.I. 1052, 3/5/15]
- M. Objection of All Star Premium Products Inc. d/b/a All Star Incentive Marketing [D.I. 1058, 3/3/15]

Related Documents:

- N. Notice of Filing of Final Version of Disclosure Statement for Debtors' Third Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [D.I. 840, 1/30/15]
- O. Order (I) Approving the Disclosure Statement; (II) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject the Plan, Including (A) Approving Form and Manner of Solicitation Procedures, (B) Approving the Form and Notice of the Confirmation Hearing, (C) Establishing Record Date and Approving Procedures for Distribution of Solicitation Packages, (D) Approving

Forms of Ballot, (E) Establishing Deadline for Receipt of Ballots, and (F) Approving Procedures for Vote Tabulations; (III) Establishing Deadline and Procedures for Filing Objections to (A) Confirmation of the Plan, and (B) the Debtors' Proposed Cure Amounts for Unexpired Leases and Executory Contracts Assumed Pursuant to the Plan; and (IV) Granting Related Relief [D.I. 845, 1/30/15]

- P. Notice of Filing of Certain Materials in Connection With Solicitation of the Debtors' Third Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [D.I. 859, 2/4/15]
- Q. Notice of Filing of Certification of Publication of *The New York Times* With Respect to Notice of (I) Approval of Disclosure Statement, (II) Deadline for Voting on the Plan, (III) Hearing to Consider Confirmation of the Plan, (IV) Deadline for Filing Objections to Confirmation of the Plan, and (V) Deadline to File Requests for Administrative Expense Claims [D.I. 918, 2/12/15]
- R. Notice of Filing of Plan Supplement for Debtors' Third Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [D.I. 928, 2/15/15]
- S. Notice of (I) Possible Assumption of Executory Contracts and Unexpired Leases, (II) Fixing of Cure Amounts and (III) Deadline to Object Thereto [D.I. 945, 2/19/15]
- T. Order (A) Authorizing the Debtors to Extend the Voting Deadline for Debtors' Third Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code and (B) Extending the Deadline for the Balloting Agent to File the Tabulation Report for Plan Voting [D.I. 966, 2/24/15]
- U. Order Authorizing the Debtors to Extend the Voting Deadline for Debtors' Third Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code Solely With Respect to the National Retirement Fund [D.I. 1065, 3/6/15]
- V. Order Authorizing the Debtors to Further Extend the Voting Deadline for Debtors' Third Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code Solely With Respect to the National Retirement Fund [D.I. 1076, 3/9/15]
- W. Declaration of James Daloia of Prime Clerk LLC Regarding the Solicitation of Votes and Tabulation of Ballots Cast on the Debtors' Third Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [D.I. 1085, 3/10/15]

- X. Debtors' Memorandum of Law in Support of and in Response to Objections to Confirmation of Debtors' Third Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [D.I. 1087, 3/10/15]
- Y. Declaration of William H. Hardie in Support of Confirmation of Debtors' Chapter 11 Plan [D.I. 1088, 3/10/15]
- Z. Declaration of Robert Griffin in Support of Confirmation of Debtors' Third Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [D.I. 1089, 3/10/15]
- AA. Notice of Filing of Debtors' Proposed Findings of Fact, Conclusions of Law, and Order Under Section 1129 of the Bankruptcy Code and Bankruptcy Rule 3020 Confirming Debtors' Third Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code as Modified [D.I. 1090, 3/10/15]
- BB. Response of the First Lien Parties the United States Trustee's and the National Retirement Fund's Objections to Confirmation [D.I. 1095, 3/11/15]
- CC. Notice of Filing of Modified Exhibits 6 and 8 to Plan Supplement for Debtors' Third Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [D.I. 1097, 3/11/15]
- DD. Notice of Filing of Partial Modified Exhibit 4 to Plan Supplement for Debtors' Third Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [D.I. 1104, 3/11/15]**
- EE. Notice of Filing of Modified Exhibit 9 to Plan Supplement for Debtors' Third Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [D.I. 1105, 3/11/15]**
- FF. Notice of Filing of Debtors' Third Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code as Modified [D.I. 1106, 3/11/15]**
- GG. Notice of Filing of Exhibit 7 to Plan Supplement for Debtors' Third Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [D.I. 1107, 3/11/15]**
- HH. Notice of Filing of Debtors' Revised Proposed Findings of Fact, Conclusions of Law, and Order Under Section 1129 of the Bankruptcy Code and Bankruptcy Rule 3020 Confirming Debtors' Third Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code as Modified [D.I. 1108, 3/11/15]**

Status: The objections to confirmation filed by the International Painters and Allied Trades Industry Pension Fund, Horizon Healthcare Services, Inc. d/b/a Horizon Blue Cross Blue Shield of New Jersey, and IGT, as well as the cure objections filed by R&R Associates, PX NJ Concessions, LLC d/b/a Panda Express, Donald J. Trump, IGT, All Star Premium Products Inc. d/b/a All Star Incentive Marketing, **and Exempt Trust U/W of Ellsworth Steinberg Trust** have been resolved through language included in the **revised** proposed confirmation order **filed at Item HH above**. The Debtors have entered into a settlement agreement with Trump AC Casino Marks, LLC (Item #3 above) which, subject to court approval, will resolve its cure objection. The Debtors are working with Sysco Philadelphia, LLC to resolve its cure objection, and anticipate doing so prior to the hearing through language included in the proposed confirmation order. This matter will be going forward.

Dated: March 12, 2015
Wilmington, Delaware

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