#### IN THE UNITED STATES BANKRUPTCY COURT

#### FOR THE DISTRICT OF DELAWARE

In re:

Chapter 11

KEYSTONE TUBE COMPANY, LLC, 1 et al.,

Case No. 17-11330 (LSS)

Debtors.

(Joint Administration Requested)

NOTICE OF AGENDA FOR HEARING ON FIRST DAY MOTIONS SCHEDULED FOR JUNE 20, 2017, AT 3:00 P.M. (PREVAILING EASTERN TIME), BEFORE THE HONORABLE LAURIE SELBER SILVERSTEIN, BANKRUPTCY JUDGE, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, LOCATED AT 824 NORTH MARKET STREET, 6th FLOOR, COURTROOM NO. 2, WILMINGTON, DELAWARE 19801<sup>2</sup>

This agenda sets forth items in the order they appear in the first day motions binders delivered to the Court. The status of each is set forth below.

- **Voluntary Petitions:** 1.
  - Α. Keystone Tube Company, LLC
  - В. A.M. Castle & Co.
  - C. **HY-Alloy Steels Company**
  - D. Keystone Service, Inc.
  - Total Plastics, Inc. E.
- 2. Declaration of Patrick R. Anderson in Support of the Debtors' Chapter 11 Petitions and Related Requests for Relief [Filed: 6/18/17] (Docket No. 9)

The Declaration will be relied upon as evidentiary support for the first day Status: matters listed below.

<sup>&</sup>lt;sup>2</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).



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<sup>&</sup>lt;sup>1</sup> The Debtors, together with the last four digits of each Debtor's tax identification number, are: Keystone Tube Company, LLC (8746); A.M. Castle & Co. (9160); HY-Alloy Steels Company (9160); Keystone Service, Inc. (9160); and Total Plastics, Inc. (3149). The location of the Debtors' headquarters and service address is 1420 Kensington Road, Suite 220, Oak Brook, IL 60523.

### First Day Administrative and Procedural Motions

3. Motion of the Debtors for Order Directing Joint Administration of Related Chapter 11 Cases for Procedural Purposes Only [Filed: 6/18/17] (Docket No. 2)

**Status:** This matter is going forward.

4. Debtors' Application for Entry of an Order, Pursuant to 28 U.S.C. § 156(c), Approving the Retention and Appointment of Kurtzman Carson Consultants LLC as Claims and Noticing Agent for the Debtors, Nunc Pro Tunc to the Petition Date [Filed: 6/18/17] (Docket No. 4)

**Status:** This matter is going forward.

5. Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to File a Consolidated List of Creditors in Lieu of Submitting a Separate Mailing Matrix for Each Debtor, (II) Authorizing the Debtors to Redact Certain Personal Identification Information for Individual Creditors, and (III) Granting Related Relief [Filed: 6/18/17] (Docket No. 5)

**Status:** This matter is going forward.

#### First Day Motions Pertaining to Operations and Related Issues

6. Motion of Debtors for Order Under Sections 105, 345, 363, 1107 and 1108 of the Bankruptcy Code Authorizing (I) Maintenance of Existing Bank Accounts; (II) Continuance of Existing Cash Management System, Bank Accounts, Checks and Related Forms; and (III) Granting Related Relief [Filed: 6/18/17] (Docket No. 6)

**Status:** This matter is going forward.

7. Motion for an Order Authorizing the Debtors to Pay Prepetition Employee Wages, Benefits, and Related Items [Filed: 6/18/17] (Docket No. 7)

**Status:** This matter is going forward.

8. Motion of the Debtors for Entry of Interim and Final Orders Under Section 366 of the Bankruptcy Code (A) Prohibiting Utility Providers from Altering, Refusing or Discontinuing Service, (B) Deeming Utility Providers Adequately Assured of Future Performance, (C) Establishing Procedures for Determining Adequate Assurance of Payment and (D) Granting Related Relief [Filed: 6/18/17] (Docket No. 8)

**Status:** This matter is going forward with respect to an interim order.

9. Debtors' Motion for Entry of Order (I) Authorizing But Not Directing, Debtors to (A) Maintain Existing Insurance Programs and (B) Pay All Obligations in Respect Thereof, (II) Perform Obligations Under Premium Financing Agreements in the Ordinary Course of Business and Grant Liens on Unearned Premiums, (III) Authorizing Banks and Financial Institutions to Honor and Process All Related Checks and Electronic Payment Requests, and (IV) Granting Related Relief [Filed: 6/18/17] (Docket No. 10)

**Status:** This matter is going forward.

10. Motion Pursuant to Sections 105(a), 507(a)(8), and 541(d) of the Bankruptcy Code for an Order Authorizing the Payment of Prepetition Sales, Use and Franchise Taxes and Similar Taxes and Fees [Filed: 6/18/17] (Docket No. 11)

**Status:** This matter is going forward.

11. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing Payment of Prepetition Claims of General Unsecured Creditors and (II) Authorizing Applicable Banks and Other Financial Institutions to Honor and Process Related Checks and Transfers, and (III) Granting Related Relief [Filed: 6/18/17] (Docket No. 13)

**Status:** This matter is going forward with respect to an interim order.

## First Day Motion Pertaining to Cash Collateral

12. Motion of Debtors Pursuant to Sections 105, 361, 362, 363, 503, and 507 of the Bankruptcy Code, Bankruptcy Rules 2002, 4001, and 9014 and Local Rules 2002-1(b), 4001-2, 9013-1(m) for Entry of Interim and Final Orders (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection, and (III) Modifying the Automatic Stay, and (IV) Scheduling a Final Hearing [Filed: 6/18/17] (Docket No. 14)

**Status:** This matter is going forward with respect to an interim order.

# First Day Motion Pertaining to Scheduling Combined Disclosure Statement Approval and Plan Confirmation Hearing

13. Debtors' Motion for Entry of an Order (I) Scheduling Combined Hearing on (A)
Adequacy of Disclosure Statement, (B) Confirmation of Prepackaged Plan of
Reorganization, and (C) the Assumption of Executory Contracts and Cure Amounts; (II)
Fixing the Deadlines to Object to Disclosure Statement, Prepackaged Plan, and Proposed
Assumption or Rejection of Executory Contracts and Cure Amounts; (III) Approving (A)
Prepetition Solicitation Procedures, (B) Form and Manner of Notice of Commencement,
Combined Hearing, Assumption of Executory Contracts and Cure Amounts Related
Thereto, and Objection Deadlines, and (C) Form and Manner of Notice of Equity Holder
Election Forms; (IV) Conditionally (A) Directing the United States Trustee Not to
Convene Section 341(a) Meeting of Creditors and (B) Waiving Requirement of Filing
Statements of Financial Affairs and Schedules of Assets and Liabilities; and (V) Granting
Related Relief [Filed: 6/18/17] (Docket No. 15)

### Related Documents:

- A. Prepackaged Joint Plan of Reorganization of Under Chapter 11 of the Bankruptcy Code [Filed: 6/18/17] (Docket No. 16)
- B. Disclosure Statement for Solicitation of Acceptances of Prepackaged Joint Chapter 11 Plan of Reorganization [Filed: 6/18/17] (Docket No. 17)
- C. Declaration of David Hartie of Kurtzman Carson Consultants, LLC Regarding the Mailing, Voting, and Tabulation of Ballots Accepting and Rejecting the Debtors' Prepackaged Joint Chapter 11 Plan of Reorganization [Filed: 6/18/17] (Docket No. 18)

**Status:** This matter is going forward.

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Dated: June 19, 2017

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