

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

KEYSTONE TUBE COMPANY, LLC,¹ et al.,
Debtors.

Chapter 11

Case No. 17-11330 (LSS)

(Joint Administration Requested)

Hearing Date: June 20, 2017, at 3:00 p.m. (ET)

NOTICE OF HEARING ON FIRST DAY MOTIONS

PLEASE TAKE NOTICE that on June 18, 2017 (the “Petition Date”), the above-captioned debtors and debtors in possession (collectively, the “Debtors”) each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), with the Clerk of the United States Bankruptcy Court for the District of Delaware. The Debtors are continuing to operate their businesses and manage their affairs as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE that together with their chapter 11 petitions, the Debtors also filed the following applications and motions set forth below (collectively, the “First Day Motions”). A hearing to consider the First Day Motions (the “First Day Hearing”) will be held on **June 20, 2017, at 3:00 p.m. (Eastern time)**, before the Honorable Laurie Selber Silverstein at the United States Bankruptcy Court for the District of Delaware (the “Court”), located at 824 North Market Street, 6th Floor, Courtroom No. 2, Wilmington, Delaware 19801.

¹ 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

1. 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)
2. 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)
3. 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)

First Day Motions Pertaining to Operations and Related Issues

4. 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)
5. Motion for an Order Authorizing the Debtors to Pay Prepetition Employee Wages, Benefits, and Related Items [Filed: 6/18/17] (Docket No. 7)
6. 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)
7. 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)
8. 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)
9. 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)

First Day Motion Pertaining to Cash Collateral

10. 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)

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

11. 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)

PLEASE TAKE FURTHER NOTICE that copies of the First Day Motions can be obtained for a fee through the Court's website at www.deb.uscourts.gov, referencing Case No. 17-11330 (LSS), or may be obtained for free by accessing the Debtors' restructuring website at <http://www.kccllc.net/amcastle>.

PLEASE TAKE FURTHER NOTICE that any and all objections to the First Day Motions may be made at the First Day Hearing.

Dated: June 19, 2017

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