Case 20-43597 Doc 1288 Filed 11/17/2

Pg 1 of 12

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MISSOURI SOUTHEASTERN DIVISION

	§	Chapter 11
In re:	§	
	§	Case No. 20-43597-399
BRIGGS & STRATTON	§	
CORPORATION, et al.,	§	(Jointly Administered)
	§	
Debtors.	§	Hearing Date: November 18, 2020
	§	Hearing Time: 10:00 a.m. (Central Time)
	§	Hearing Location: Courtroom 5-North

AMENDED PROPOSED AGENDA FOR HEARING ON NOVEMBER 18, 2020 AT 10:00 A.M. (PREVAILING <u>CENTRAL TIME) AND INSTRUCTIONS FOR TELEPHONIC HEARING</u>

Parties may appear in person, by telephone or (optionally) via video conferencing for the Briggs & Stratton hearing scheduled at **10:00 a.m. Central Time on Wednesday, November 18, 2020**.

Location of Hearing: United States Bankruptcy Court for the Eastern District of Missouri, Thomas F. Eagleton U.S. Courthouse, before the Honorable Barry S. Schermer, <u>Courtroom 5-North</u>, 111 South 10th Street, St. Louis, MO 63102

Instructions for Telephonic & Video Hearing:

No later than **November 17, 2020**, the Court will send a Cisco WebEx invite to all parties who have either received prior Cisco WebEx invites or have contacted Judge Schermer's Courtroom Deputy, Shontelle McCoy, directly to make an initial request to appear remotely. (Parties are not required to make a request to appear remotely for each hearing.)

When accessing the audio, participants must join Cisco WebEx *first* via a computer *and* join the call second (either through the Call-In option and enter an attendee ID or through the "Call me at" option.) All participants must mute their phone lines immediately after joining the call. Phones shall not be placed on "hold". If speaking, the Court strongly suggests the use of hand-held receivers or headphones in lieu of using speakers on telephones and computers. Participants may unmute their phone lines and speak only when directed by Judge Schermer. If appearing by video, select the "Hand Raised" feature and wait until Judge Schermer addresses you. When speaking, please keep all background noise to a minimum to prevent audio interference or feedback. After speaking, please place your telephone back on mute.



Case 20-43597 Doc 1288 Filed 11/17/20 Entered 11/17/20 21:05:29 Main Document Pg 2 of 12

If there is a problem connecting to Cisco WebEx audio, please disconnect your phone line and re-dial. If there is an issue gaining access to the video feed, please log out of Cisco WebEx then login. If the issue persists, please e-mail Ms. McCoy at <u>Shontelle McCoy@moeb.uscourts.gov</u> promptly and we will work on resolving the issue.

The Court's official announcement will be posted on the Court's website: <u>https://www.moeb.uscourts.gov/sites/moeb/files/BSS-</u><u>Appearances for Briggs Stratton ATT call info.pdf</u> and <u>https://www.moeb.uscourts.gov/briggs-stratton-corporation-et-al</u>. Instructions for appearances may also be found on <u>http://www.kccllc.net/briggs</u>.

DEBTORS' MOTIONS		
Item Number	Motion	Attorney Presenting
1	First Omnibus Motion of Debtors for Order (I) Authorizing (A) Rejection of Certain Executory Contracts and Unexpired Leases and (B) Abandonment of Property in Connection Therewith; and (II) Granting Related Relief [Docket No. 1184].	Martha Martir
	Related Documents: Notice of Filing of Updated Exhibit to Debtors' Motion for Order (I) Authorizing (A) Rejection of Certain Executory Contracts and Unexpired Leases and (B) Abandonment of Property in Connection Therewith; and (II) Granting Related Relief [Docket No. 1287].	
	Objections: Limited Objection and Reservation of Rights of United Steelworkers to Debtors' First Omnibus Motion to Authorize Rejection of Executory Contracts and Abandonment of Property [Docket No. 1239] – RESOLVED .	

MOTIONS FOR ALLOWANCE OF ADMINISTRATIVE EXPENSE CLAIMS				
Item Number	Motion	Attorney Presenting		
2	Motion of UFP Technologies, Inc. for (I)	Attorneys for UFP		
	Allowance and Payment of Administrative	Technologies, Inc.		
	Expense Pursuant to 11 U.S.C. §503(b)(9);			
	(II) Allowance and Payment of			
	Administrative Expense Pursuant to 11			
	U.S.C. §503(b)(1); and (III) Determination			

Case 20-43597 Doc 1288 Filed 11/17/20 Entered 11/17/20 21:05:29 Main Document Pg 3 of 12

	that any Agreements Between UFPT and the	
	Debtors That Constitute Executory Contracts are Rejected As of September 10, 2020	
	[Docket No. 882] – ADJOURNED TO	
	DECEMBER 16, 2020 HEARING.	
	, ,	
	Related Documents: No related documents.	
	Objections:	
	Debtors' Limited Objection to UFP	
	Technologies, Inc's Motion for (I) Allowance	
	and Payment of Administrative Expense	
	Pursuant to 11 U.S.C. Section (B)(9); (II)	
	Allowance and Payment of Administrative Expense Pursuant to 11 U.S.C. Section	
	503(B)(1); and (III) Determination that Any	
	Agreements Between UFP and the Debtors	
	that Constitute Executory Contracts are	
	Rejected [Docket No. 1283].	
3	Aavid Allcast, LLC's Application for	Attorneys for Aavid Allcast,
	Allowance and Payment of Administrative	LLC
	Expense Pursuant to 11 U.S.C. §503(b)(9)	
	[Docket No. 1027].	
	Related Documents: No related documents.	
	Objections:	
	Debtors' Omnibus Response and Objection to	
	Requests for Allowance and Payment of	
	Administrative Expense Pursuant to 11	
4	U.S.C. § 503(b)(9) [Docket No. 1240]. A.B. Boyd Co.'s Application for Allowance	Attorneys for A.B. Boyd Co.
	and Payment of Administrative Expense	Automoys for A.D. Doya Co.
	Pursuant to 11 U.S.C. §503(b)(9) [Docket No.	
	1030].	
	Related Documents: No related documents.	
	Kelated Documents: No related documents.	
	Objections:	
	Debtors' Omnibus Response and Objection to	
	Requests for Allowance and Payment of	
	Administrative Expense Pursuant to 11 $U \le C \le 502(h)(0)$ [Desired No. 1240]	
5	U.S.C. § 503(b)(9) [Docket No. 1240]. Pro Metal Works, Inc.'s Motion for	Attomaya for Dra Matal
3	Pro Metal Works, Inc.'s Motion for Allowance of Administrative Expense Claims	Attorneys for Pro Metal Works, Inc.
	Pursuant to 11 U.S.C. §503(b)(9) and 11	WOIKS, IIC.

Case 20-43597 Doc 1288 Filed 11/17/20 Entered 11/17/20 21:05:29 Main Document Pg 4 of 12

	U.S.C. § 503(b)(1)(A) and 11 U.S.C. § 546(c) Against Debtor Briggs & Stratton	
	Corporation [Docket No. 1036] –	
	ADJOURNED TO DECEMBER 16, 2020	
	HEARING.	
	Related Documents: No related documents.	
	Objections: No objections filed.	
6	Pro Metal Works, Inc.'s Motion for Allowance of Administrative Expense Claim	Attorneys for Pro Metal Works, Inc.
	Pursuant to 11 U.S.C. § 503(b)(9) Against	works, me.
	Debtor Billy Goat Industries, Inc. [Docket	
	No. 1038] – ADJOURNED TO	
	DECEMBER 16, 2020 HEARING.	
	Related Documents: No related documents.	
	Objections:	
	Debtors' Omnibus Response and Objection to Requests for Allowance and Payment of	
	Administrative Expense Pursuant to 11	
	U.S.C. § 503(b)(9) [Docket No. 1240].	
7	Motion of Curtis Machine Company, Inc. for	Attorneys for Curtis Machine
	Allowance of Administrative Expense Claim,	Company, Inc.
	Pursuant to 11 U.S.C. Section 503(b)(9) and Related Relief [Docket No. 1046].	
	Related Relief [Docket No. 1040].	
	Related Documents: No related documents.	
	Objections:	
	Debtors' Omnibus Response and Objection to	
	Requests for Allowance and Payment of	
	Administrative Expense Pursuant to 11	
8	U.S.C. § 503(b)(9) [Docket No. 1240]. Motion of Curtis Machine Company, Inc. for	Attorneys for Curtis Machine
0	Allowance of Administrative Expense Claim	Company, Inc.
	as to Billy Goat Industries, Inc. Pursuant to 11	1 7
	U.S.C. Section 503(b)(9) and Related Relief	
	[Docket No. 1048].	
	Related Documents: No related documents.	
	Objections:	
	Debtors' Omnibus Response and Objection to	
	Requests for Allowance and Payment of	

Case 20-43597 Doc 1288 Filed 11/17/20 Entered 11/17/20 21:05:29 Main Document Pg 5 of 12

Administrative	Expense	Pursuant	to	11
U.S.C. § 503(b)	(9) [Docke	t No. 1240].	

MOTIONS FOR RELIEF FROM AUTOMATIC STAY				
Item Number	Motion	Attorney Presenting		
9	Motion for Relief from the Automatic Stay as to James Troy and Elaine Troy [Docket No. 1043].	Attorneys for James Troy and Elaine Troy		
	Related Documents: Omnibus Reply in Support of the Motions for Relief from the Automatic Stay as to Certain Asbestos Claimants [Docket No. 1264].			
	Objections: Debtors' Omnibus Objection to Certain Asbestos Claimants' Motions for Relief from Automatic Stay [Docket No. 1242].			
10	Motion for Relief from the Automatic Stay as to Debra Lack, Individually and as Representative of the Estate of Bruce L. Lack [Docket No. 1140].	Attorneys for Debra Lack		
	Related Documents : Omnibus Reply in Support of the Motions for Relief from the Automatic Stay as to Certain Asbestos Claimants [Docket No. 1264].			
	Exhibit D to Omnibus Reply in Support of the Motions for Relief from the Automatic Stay as to Certain Asbestos Claimants [Docket No. 1286].			
	Objections: Debtors' Omnibus Objection to Certain Asbestos Claimants' Motions for Relief from Automatic Stay [Docket No. 1242].			
11	Motion for Relief from the Automatic Stay as to Robin Schmidt and Joann Schmidt [Docket No. 1143].	Attorneys for Robin Schmidt and Joanne Schmidt		
	Related Documents: Omnibus Reply in Support of the Motions for Relief from the Automatic Stay as to Certain Asbestos Claimants [Docket No. 1264].			

Case 20-43597 Doc 1288 Filed 11/17/20 Entered 11/17/20 21:05:29 Main Document Pg 6 of 12

Objections: Debtors' Omnibus Objection to Certain Asbestos Claimants' Motions for Relief from Automatic Stay [Docket No. 1242]. 12 Motion for Relief from the Automatic Stay as Attorneys for Patrician	
Asbestos Claimants' Motions for Relief from Automatic Stay [Docket No. 1242].	
Automatic Stay [Docket No. 1242].	
12 Motion for Relief from the Automatic Stay as Attorneys for Patrici	
	ia A.
to Patricia A. Main, Individually and as Main	
Personal Representative for the Estate of Billy	
D. Main [Docket No. 1148].	
Related Documents:	
Omnibus Reply in Support of the Motions for	
Relief from the Automatic Stay as to Certain	
Asbestos Claimants [Docket No. 1264].	
Asoestos Chamiants [Docket No. 1204].	
Objections:	
Debtors' Omnibus Objection to Certain	
Asbestos Claimants' Motions for Relief from	
Automatic Stay [Docket No. 1242].13Claudia Hartke, Liberty Mutual Insurance, Attorney for Claudia H	Iontho
Allstate Insurance Company, Fire Insurance Liberty Mutual Insur	
Exchange, Farmers Insurance Exchange, Allstate Insurance Cor	
Foremost Insurance Company Grand Rapids, Fire Insurance Excha	U .
Michigan and Mid-Century Insurance Farmers Insurance	
Company's Combined Motion for Relief from Exchange, Foremo	
the Automatic Stay [Docket No. 1108]. Insurance Company (
Rapids, Michigan and	
Related Documents: No related documents. Century Insurance Control C	mpany
Objections:	
Debtors' Objection to Claudia Hartke's	
Motion for Relief from the Automatic Stay	
[Docket No. 1254].	
14 Motion for Relief from Automatic Stay Filed Attorneys for De L	-
by De Lage Landen Financial Services, Inc. Landen Financial Ser	vices,
[Docket No. 1131] – ADJOURNED TO Inc.	
DECEMBER 16, 2020 HEARING.	
Related Documents: No related documents.	
Objections: No objections filed.	
15 Krista "Danyale" Ward and Joseph Ward's Attorneys for Kris	sta
Motion for Relief from Automatic Stay "Danyale" Ward and J	Ioseph
[Docket No. 1163] – RESOLVED . Ward	
Related Documents:	

Case 20-43597 Doc 1288 Filed 11/17/20 Entered 11/17/20 21:05:29 Main Document Pg 7 of 12

Stipulation and Consent Order Granting Partial Relief from the Automatic Stay [Docket No. 1261]
Objections: No objections filed.

OBJECTIONS TO PROPOSED ASSUMPTION AND ASSIGNMENT OF				
	EXECUTORY CONTRACTS AND UNEXPIRED LEASES			
Item Number	Objection	Attorney Presenting		
16	Ace Hardware Corporation's Limited Objection and Reservation of Rights [Docket No. 994] – WITHDRAWN .	Attorneys for Ace Hardware Corporation		
17	Limited Objection and Reservation of Rights of Allied Marketing, Inc. to Debtors' Second Amended Notice of Cure Costs and Proposed Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale [Docket No. 993] – WITHDRAWN .	Attorneys for Allied Marketing, Inc.		
18	Alpha Sintered Metals, Inc.'s Objection to Amended Notice of Cure Costs and Proposed Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale [Docket No. 960] – WITHDRAWN.	Attorneys for Alpha Sintered Metals, Inc.		
19	AT&T's Corporation Limited Objection to Notice of Potential Assumption of Executory Contracts or Unexpired Leases and Cure Amounts [Docket No. 831] – RESOLVED .	Attorneys for AT&T Corporation		
20	Objection and Reservation of Rights of Ataco Steel Products Corporation to Notice of Cure Costs and Proposed Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale [Docket No. 809] – WITHDRAWN .	Attorneys for Ataco Steel Products Corporation		
21	Objection and Reservation of Rights of Boyd Corporation and Wholly Owned Subsidiaries Aavid Thermalloy, LLC and A.B. Boyd Co. to Debtors' Amended Notice of Cure Costs and Proposed Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale [Docket No. 961] – ADJOURNED TO DECEMBER 16, 2020 HEARING .	Attorneys for Boyd Corporation and Wholly Owned Subsidiaries Aavid Thermalloy, LLC and A.B. Boyd Co.		
22	Objection and Reservation of Rights of Dantherm S.p.A. to Debtors' Amended Notice	Attorneys for Dantherm S.p.A.		

Case 20-43597 Doc 1288 Filed 11/17/20 Entered 11/17/20 21:05:29 Main Document Pg 8 of 12

	of Cure Costs and Proposed Assumption and	
	Assignment of Executory Contracts and	
	Unexpired Leases in Connection with Sale	
	[Docket No. 963] – WITHDRAWN.	
23	Objection of Davis Tool & Die Co., Inc. and	Attorneys for Davis Tool &
	Poplar Bluff Tool & Die Co., Inc. to Notice of	Die Co., Inc. and Poplar
	Cure Costs and Proposed Assumption and	Bluff Tool & Die Co., Inc.
	Assignment of Executory Contracts and	
	Unexpired Leases in Connection with Sale	
	[Docket No. 920] – WITHDRAWN.	
24	Deere & Company's Limited Objection and	Attorneys for Deere &
	Reservation of Rights [Docket No. 858] -	Company
	ADJOURNED TO DECEMBER 16, 2020	
	HEARING.	
25	De Lage Landen Financial Services, Inc's	Attorneys for De Lage
-	Limited Objection to Debtor's Fourth	Landen Financial Services,
	Amended Notice to Cure Costs and Proposed	Inc.
	Assumption and Assignment of Executory	
	Contracts and Unexpired Leases in	
	Connection with Sale [Docket No. 1203] –	
	ADJOURNED TO DECEMBER 16, 2020	
	HEARING.	
26	Limited Objection of FR Georgia, LLC to	Attorneys for FR Georgia,
	Notice of Potential Assumption of Executory	LLC
	Contracts and Unexpired Leases and Cure	
	Amounts [Docket No. 869] – ADJOURNED	
	TO DECEMBER 16, 2020 HEARING.	
27	Objection of Gannett Satellite Information	Attorneys for Gannett
	Network LLC/USA Today Network to	Satellite Information
	Debtors' Notice of Cure Costs and Proposed	Network LLC/USA Today
	Assumption and Assignment of Executory	Network
	Contracts and Unexpired Leases in	
	Connection with Sale [Docket No. 839] –	
	RESOLVED.	
28	Objection of Georgia Power Company to	Attorneys for Georgia Power
_	Proposed Cure Costs [Docket No. 861] -	Company
	ADJOURNED TO DECEMBER 16, 2020	y
	HEARING.	
29	Renewed Objection of Hoffer Plastics	Attorneys for Hoffer Plastics
-	Corporation and Reservation of Rights in	Corporation
	Response to Second Amended Notice of Cure	1
	Costs and Proposed Assumption and	
	Assignment of Executory Contracts and	
	Unexpired Leases in Connection with Sale	
	[Docket No. 995] – WITHDRAWN.	

Case 20-43597 Doc 1288 Filed 11/17/20 Entered 11/17/20 21:05:29 Main Document Pg 9 of 12

30	Limited Objection of Infor (US), Inc. to	Attorneys for Infor (US),
	Proposed Sale of Substantially All of the	Inc.
	Debtors' Assets and Proposed Assumption and	
	Assignment of Executory Contracts [Docket	
	No. 763] – RESOLVED .	
31	Objection of Jones Plastic & Engineering	Attorneys for Jones Plastic
	Company, LLC to Amended Notice of Cure	& Engineering Company,
	Costs and Proposed Assumption and	LLC
	Assignment of Executory Contracts and	
	Unexpired Leases in Connection with Sale	
	[Docket No. 934] – ADJOURNED TO	
	DECEMBER 16, 2020 HEARING.	
32	Limited Objection of Microsoft to Notice of	Attorneys for Microsoft
	Cure Costs and Proposed Assumption and	Licensing, GP
	Assignment of Executory Contracts and	
	Unexpired Leases in Connection with Sale	
	[Docket No. 750] – ADJOURNED TO	
	DECEMBER 16, 2020 HEARING.	
33	Renewed Limited Objection of MSC	Attorneys for MSC
	Industrial Supply Co. to Amended Notice of	Industrial Supply Co.
	Potential Assumption of Executory Contracts	11.2
	and Unexpired Leases and Cure Amounts	
	[Docket No. 956] – RESOLVED .	
34	Oracle's Limited Objection to and Reservation	Attorneys for Oracle
	of Rights Regarding (1) Debtors' Motion	America, Inc.
	Authorizing (A) Sale of Debtors' Assets and	,
	Equity Interests Free and Clear of Liens,	
	Claims, Interests, and Encumbrances and (B)	
	Assumption and Assignment of Executory	
	Contracts and Unexpired Leases; and (III)	
	Granting Related Relief; and (2) Notice of	
	Cure Costs and Proposed Assumption and	
	Assignment of Executory Contracts and	
	Unexpired Leases in Connection with Sale	
	[Docket No. 833] – ADJOURNED TO	
	DECEMBER 16, 2020 HEARING.	
35	R.R. Donnelley & Sons Company's Objection	Attorneys for R.R.
55	to Amended Notice of Cure Costs and	Donnelley & Sons Company
	Proposed Assumption and Assignment to	Donnency & Sons Company
	Executory Contracts and Unexpired Leases in	
	Connection with Sale [Docket No. 953] –	
	ADJOURNED TO DECEMBER 16, 2020 HEARING.	
26		Attornous for CAD America
36	Objection and Reservation of Rights of SAP	Attorneys for SAP America,
	America, Inc. and its Affiliates	Inc. and its Affiliates
	SuccessFactors, Inc., Concur Technologies,	

Case 20-43597 Doc 1288 Filed 11/17/20 Entered 11/17/20 21:05:29 Main Document Pg 10 of 12

	Inc., and Ariba, Inc. to the Assumption and	
	Assignment of Certain Executory Contracts	
	Pursuant to the Debtors' Sale Motion and Cure	
	Notice [Docket No. 824] – ADJOURNED	
	TO DECEMBER 16, 2020 HEARING.	
37	Objection and Reservation of Rights of UFP	Attorneys for UFP
	Technologies, Inc. to Proposed Cure Amount	Technologies, Inc.
	and to the Notice of Cure Costs and Proposed	-
	Assumption and Assignment of Executory	
	Contracts and Unexpired Leases in	
	Connection with Sale [Docket No. 702] –	
	ADJOURNED TO DECEMBER 16, 2020	
	HEARING.	
38	Limited Objection of United Parcel Service to	Attorneys for United Parcel
	Debtors' Notice of Cure Costs and Proposed	Service, Inc.
	Assumption and Assignment of Executory	~~~,,
	Contracts and Unexpired Leases in	
	Connection with Sale [Docket No. 756] –	
	ADJOURNED TO DECEMBER 16, 2020	
	HEARING.	
39	Objection of Walbro LLC to Notice of Cure	Attorneys for Walbro LLC
07	Costs and Proposed Assumption and	
	Assignment of Executory Contracts and	
	Unexpired Leases in Connection with Sale,	
	Request for Adequate Assurance of Future	
	Performance, and Reservation of Rights	
	[Docket No. 769] – RESOLVED .	
40	Limited Objection of Wells Fargo	Attorneys for Wells Fargo
10	Commercial Distribution Finance, LLC to the	Commercial Distribution
	Notice of Cure Costs and Proposed	Finance, LLC
	Assumption and Assignment of Executory	T manee, EEC
	Contracts and Unexpired Leases in	
	Connection with Sale [Docket No. 834] –	
	ADJOURNED TO DECEMBER 16, 2020	
	HEARING.	
41	Wiscraft Inc.'s Limited Objection to Notice of	Attorneys for Wiscraft Inc.
71	Cure Costs and Proposed Assumption and	Autometys for wischaft me.
	Assignment of Executory Contracts and	
	Unexpired Leases in Connection with Sale	
	[Docket No. 853] – RESOLVED .	
42	Limited Objection of Wurth Industry North	Attorneys for Wurth
42	America LLC to Assumption and Assignment	
		Industry North America
	and Cure Amounts Listed by Debtors in Their	LLC
	Notice of Cure Costs and Proposed	
	Assumption and Assignment of Executory	

Case 20-43597 Doc 1288 Filed 11/17/20 Entered 11/17/20 21:05:29 Main Document Pg 11 of 12

	Contracts and Unexpired Leases [Docket No. 770] – WITHDRAWN .	
43	Objection of W. W. Grainger, Inc. to Notice of Cure Costs and Proposed Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale [Docket No. 746] – ADJOURNED TO DECEMBER 16, 2020 HEARING.	Attorneys for W. W. Grainger, Inc.

Case 20-43597 Doc 1288 Filed 11/17/20 Entered 11/17/20 21:05:29 Main Document Pg 12 of 12

Dated: November 17, 2020 St. Louis, Missouri

Respectfully submitted,

CARMODY MACDONALD P.C.

/s/ Robert E. Eggmann

Robert E. Eggmann, #37374MO Christopher J. Lawhorn, #45713MO Thomas H. Riske, #61838MO 120 S. Central Avenue, Suite 1800 St. Louis, Missouri 63105 Telephone: (314) 854-8600 Facsimile: (314) 854-8660 Email: ree@carmodymacdonald.com cjl@carmodymacdonald.com thr@carmodymacdonald.com

Local Counsel to the Debtors and Debtors in Possession

-and-

WEIL, GOTSHAL & MANGES LLP
Ronit J. Berkovich (admitted *pro hac vice*)
Debora A. Hoehne (admitted *pro hac vice*)
Martha E. Martir (admitted *pro hac vice*)
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Email: Ronit.Berkovich@weil.com
Debora.Hoehne@weil.com
Martha.Martir@weil.com

Counsel to the Debtors and Debtors in Possession