

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re: : Chapter 11
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CELADON GROUP, INC., *et al.*,<sup>1</sup> : Case No. 19-12606 (KBO)
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Debtors. : (Jointly Administered)
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: **Related D.I.: 77, 78, 79, 99**
: **Hr’g Date: January 3, 2020 at 10:00 a.m. (ET)**
: **Obj. Deadline: December 27, 2019 at 4:00 p.m. (ET)**
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**OMNIBUS NOTICE OF MOTIONS, APPLICATIONS, AND HEARING**

**PLEASE TAKE NOTICE** that Celadon Group, Inc. and its affiliated debtors in the above captioned chapter 11 cases (collectively, the “Debtors”) recently filed the following motions with the United States Bankruptcy Court for the District of Delaware (the “Court”):

- *Motion of the Debtors for Entry of an Administrative Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [D.I. 99] (the “Interim Compensation Motion”); and*
- *Motion of the Debtors for the Entry of Orders: (I)(A) Approving Bidding Procedures for the Sale of the Remaining Assets and Setting Bid Protections Guidelines, (B) Permitting Debtors to Designate Stalking Horse Purchaser(s) and Grant Bid Protections, (C) Scheduling a Hearing to Consider Approval of the Sale of Assets, (D) Approving Form and Manner of Notice of Sale, and (E) Granting Related Relief; and (II)(A) Authorizing and Approving the Sale of Substantially All Assets of Certain of the Debtors Free and Clear of Liens, Claims, Interests, and Encumbrances, (B) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (C) Granting Related Relief [D.I. 79] (the “Bidding Procedures Motion”).*

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Celadon Group, Inc. (1050); A R Management Services, Inc. (3604); Bee Line, Inc. (5403); Celadon Canadian Holdings, Limited (2539); Celadon E-Commerce, Inc. (2711); Celadon International Corporation (5246); Celadon Logistics Services, Inc. (0834); Celadon Mexicana, S.A. de C.V. (6NL7); Celadon Realty, LLC (2559); Celadon Trucking Services, Inc. (6138); Distribution, Inc. (0488); Eagle Logistics Services Inc. (7667); Hyndman Transport Limited (3249); Jaguar Logistics, S.A. de C.V. (66D1); Leasing Servicios, S.A. de C.V. (9MUA); Osborn Transportation, Inc. (7467); Quality Companies LLC (4073); Quality Equipment Leasing, LLC (2403); Quality Insurance LLC (7248); Servicios Corporativos Jaguar, S.C. (78CA); Servicios de Transportación Jaguar, S.A. de C.V. (5R68); Stinger Logistics, Inc. (3860); Strategic Leasing, Inc. (7534); Taylor Express, Inc. (9779); Transportation Insurance Services Risk Retention Group, Inc. (7197); Vorbas, LLC (8936). The corporate headquarters and the mailing address for the Debtors listed above is 9503 East 33rd Street, One Celadon Drive, Indianapolis, IN 46235.



**PLEASE TAKE FURTHER NOTICE** that on December 13, 2019, the Debtors also filed the following applications with the Court:

- *Application of the Debtors for Entry of an Order (I) Authorizing Them to Retain and Employ DLA Piper LLP (US) as Counsel, Nunc Pro Tunc to the Petition Date and (II) Granting Related Relief* [D.I. 77] (the “DLA Retention Application”); and
- *Application of the Debtors for Entry of an Order Authorizing the Employment and Retention of AlixPartners, LLP as Financial Advisor to the Debtors Nunc Pro Tunc to the Petition Date* [D.I. 78] (the “Alix Retention Application”).

**PLEASE TAKE FURTHER NOTICE** that any objection or response to the Interim Compensation Motion, the Bidding Procedures Motions, the DLA Retention Application, or the Alix Retention Application (collectively, the “Motions”) must be (i) filed with the Clerk of the Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before **December 27, 2019 at 4:00 p.m. (ET)** (the “Objection Deadline”) and (ii) served no later than the Objection Deadline on the undersigned counsel for the Debtors.

**PLEASE TAKE FURTHER NOTICE** that if a response is timely filed and served, you or your attorney must attend the hearing on the Motions scheduled to be held before The Honorable Karen B. Owens, United States Bankruptcy Judge, at the Court, 824 North Market Street, 5th Floor, Courtroom 6, Wilmington, Delaware 19801 on **January 3, 2020 at 10:00 a.m. (ET)**.

**PLEASE TAKE FURTHER NOTICE THAT IF NO RESPONSE TO THE MOTION IS TIMELY FILED, SERVED, AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY ENTER THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE.**

**PLEASE TAKE FURTHER NOTICE** that all pleadings, notices, and other documents filed in the Debtors’ chapter 11 cases are publicly available, free of charge, at the Debtors’ claims and noticing agent’s website: <https://www.kccllc.net/Celadon>.

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Dated: December 17, 2019  
Wilmington, Delaware

Respectfully submitted,

**DLA PIPER LLP (US)**

/s/ Stuart M. Brown

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*Proposed Counsel to the Debtors*