

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

-----X

In re:	:	Chapter 11
	:	Case No. 15-11296 ()
COLT HOLDING COMPANY LLC, <i>et al.</i> , ¹	:	
Debtors.	:	Joint Administration Requested

-----X

**AGENDA FOR FIRST DAY HEARING
AND INDEX OF FIRST DAY PLEADINGS**

A. Voluntary Petitions:

1. Colt Holding Company LLC
2. Colt Security LLC
3. Colt Defense LLC
4. Colt Finance Corp.
5. New Colt Holding Corp.
6. Colt's Manufacturing Company LLC
7. Colt Defense Technical Services LLC
8. Colt Canada Corporation
9. Colt International Coöperatief U.A.
10. CDH II Holdco Inc.

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are Colt Holding Company LLC (0094); Colt Security LLC (4276); Colt Defense LLC (1950); Colt Finance Corp. (7687); New Colt Holding Corp. (6913); Colt's Manufacturing Company LLC (9139); Colt Defense Technical Services LLC (8809); Colt Canada Corporation (5534); Colt International Coöperatief U.A. (6822); and CDH II Holdco Inc. (1782). The address of the Debtors' corporate headquarters is: 547 New Park Avenue, West Hartford, Connecticut 06110.

B. Keith A. Maib's Declaration in Support of the Debtors' Chapter 11 Petitions and First Day Pleadings [D.I. 17; filed June 15, 2015]

C. First Day Motions:

1. Debtors' Motion for Entry of an Order Directing Joint Administration of Chapter 11 Cases [D.I. 2; filed June 15, 2015]
2. Debtors' Motion for Entry of an Order Authorizing Colt Holding Company LLC to Act as Foreign Representative on Behalf of the Debtors' Estates [D.I. 3; filed June 15, 2015]
3. Debtors' Motion for Entry of an Order Authorizing the Debtors to File a Consolidated List of Creditors Instead of Submitting a Separate Mailing Matrix for Each Debtor [D.I. 4; filed June 15, 2015]
4. Debtors' Application for Entry of an Order Authorizing Employment and Retention of Kurtzman Carson Consultants LLC as Claims and Noticing Agent, *Nunc Pro Tunc* to the Petition Date [D.I. 5; filed June 15, 2015]
5. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Continued Use of the Debtors' Existing Cash Management System and Bank Accounts; (II) Waiving Certain United States Trustee Requirements; (III) Authorizing Continued Performance of Intercompany Transactions; and (IV) Granting Related Relief [D.I. 7; filed June 15, 2015]
6. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Prepetition Claims of Critical Vendors and (II) Granting Related Relief [D.I. 8; filed June 15, 2015]
7. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Taxes and Fees and (II) Granting Related Relief [D.I. 9; filed June 15, 2015]
8. Debtors' Motion for Entry of Interim and Final Orders (I) Prohibiting Utilities From Altering, Refusing, or Discontinuing Service; (II) Approving the Debtors' Proposed Form of Adequate Assurance of Payment to Utilities; and (III) Establishing Procedures for Resolving Objections to the Debtors' Proposed Form of Adequate Assurance [D.I. 10; filed June 15, 2015]
9. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Maintain and Renew their Prepetition Insurance Policies and Pay all Obligations in Respect Thereof and (III) Granting Related Relief [D.I. 11; filed June 15, 2015]
10. Debtors' Motion (I) Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, and 507 Authorizing the Debtors to (A) Obtain Post-Petition Financing, (B) Grant Senior

Liens and Superpriority Administrative Expense Status, and (C) Utilize Cash Collateral of Pre-Petition Secured Parties; (II) Granting Adequate Protection to Pre-Petition Secured Parties Pursuant to 11 U.S.C. §§ 361, 362, 363, and 364; (III) Scheduling a Final Hearing; and (III) Granting Related Relief [D.I. 12; filed June 15, 2015]

i. Declaration of Nikhil Menon in Support of Debtors' Motion (I) Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, and 507 Authorizing the Debtors to (A) Obtain PostPetition Financing, (B) Grant Senior Liens and Superpriority Administrative Expense Status, and (C) Utilize Cash Collateral of Pre-Petition Secured Parties; (II) Granting Adequate Protection to Pre-Petition Secured Parties Pursuant to 11 U.S.C. §§ 361, 362, 363, and 364; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief [D.I. 14; filed June 15, 2015]

11. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Certain Employee Compensation and Benefits, (B) Maintain and Continue Such Benefits and Other Employee-Related Programs, and (C) Pay Prepetition Claims of Independent Contractors and (II) Granting Related Relief [D.I. 15; filed June 15, 2015]

12. Debtors' Motion for Entry of an Order Authorizing Debtors to File Fee Letters Related to Proposed Postpetition Financing Facility Under Seal [D.I. 16; filed June 15, 2015]

D. Other Motion:²

13. Debtors' Motion, Pursuant to 11 U.S.C. §§ 105, 363, and 365, and Fed. R. Bankr. P. 2002, 6004, 6006, 9008 and 9014, for Entry of (A) an Order (I) Approving Bid Procedures in Connection with the Sale of Substantially All of the Debtors' Assets Free and Clear of Liens, Claims, Encumbrances, and Other Interests, (II) Approving Procedures Related to the Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Such Sale, (III) Approving the Form and Manner of Notice Thereof, (IV) Scheduling the Hearing to Consider Approval of Such Sale, and (V) Granting Certain Related Relief; and (B) an Order Approving the Sale of Substantially All of the Debtors' Assets [D.I. 13; filed June 15, 2015]

² A copy of this motion is included herein for the convenience of the Court only; a hearing on such motion will take place at a later date on appropriate notice.

Dated: June 15, 2015
Wilmington, Delaware



RICHARDS, LAYTON & FINGER, P.A.

Mark D. Collins (No. 2981)
Jason M. Madron (No. 4431)
One Rodney Square
920 North King Street
Wilmington, Delaware 19801
Telephone: (302) 651-7700
Facsimile: (302) 651-7701

-and-

O'MELVENY & MYERS LLP

John J. Rapisardi (*pro hac vice* admission pending)
Joseph Zujkowski (*pro hac vice* admission pending)
Diana M. Perez (*pro hac vice* admission pending)
Times Square Tower
Seven Times Square
New York, New York 10036
Telephone: (212) 326-2000
Facsimile: (212) 326-2061

*Proposed Attorneys for Debtors
and Debtors in Possession*