

1 CRAIG H. MILLET, SBN 106027, CMillet@gibsondunn.com
2 SOLMAZ KRAUS, SBN 223117, SKraus@gibsondunn.com
3 GIBSON, DUNN & CRUTCHER LLP
4 3161 Michelson Drive
5 Irvine, California 92612-4412
6 Telephone: (949) 451-3800
7 Facsimile: (949) 451-4220

8 Proposed Attorneys for
9 Debtors and Debtors in Possession

10 UNITED STATES BANKRUPTCY COURT
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA
12 RIVERSIDE DIVISION

13 In re
14 FLEETWOOD ENTERPRISES, INC., et al.,
15 Debtors.

CASE NO. 09-14254-MJ

Chapter 11

[Joint Administration Pending]

**OMNIBUS NOTICE OF HEARING ON
FIRST DAY PLEADINGS**

Hearing:

Date: March 12, 2009

Time: 2:00 p.m.

Place: Courtroom 302
3420 Twelfth Street
Riverside, CA 92501

Judge: Honorable Meredith A. Jury

16
17
18
19
20
21 **PLEASE TAKE NOTICE** that Fleetwood Enterprises, Inc., et al., the debtors and debtors in
22 possession in the above-captioned cases (the "Debtors"), have filed the following emergency motions
23 (collectively, the "First Day Pleadings"):
24
25
26
27
28



1 1. Motion Of The Debtors, Pursuant To 11 U.S.C. § 105, Local Bankruptcy Rule
2 2081-1, And Federal Rule Of Bankruptcy Procedure 6004(h), For An Order Setting An
3 Expedited Hearing On First Day Pleadings And Related Relief (*i.e.*, this Motion)¹;

4 2. Motion Of Debtors For Order Directing Joint Administration Of Related Chapter 11
5 Cases;

6 3. Debtors' Motion For Entry of Interim And Final Orders Pursuant To 11 U.S.C. §§
7 105, 361, 362, 363, And 364, and Rules 2002, 4001 And 9014 of the Federal Rules Of Bankruptcy
8 Procedure (a) Authorizing Use Of Cash Collateral by the Debtors And Providing For Adequate
9 Protection, (b) Modifying The Automatic Stay, And (c) Scheduling A Final Hearing;

10 4. Debtors' Motion For An Order Authorizing (A) Continued Use Of Cash Management
11 System, (B) Extension of Time to Order New Checks; (C) Maintenance Of Existing Investment
12 Policies, and (D) Payment Of Bank Fees And Expenses ("Cash Management Motion");

13 5. Debtors' Motion For An Order Pursuant To Section 366 Of The Bankruptcy Code (a)
14 Determining Adequate Assurance of Payment for Future Performance, (b) Prohibiting Utility
15 Providers from Altering, Refusing or Discontinuing Service, And (c) Establishing Procedures For
16 Resolving Requests For Additional Adequate Assurance Of Payment ("Utilities Motion");

17 6. Debtors' Motion For Entry Of An Order (a) Authorizing The Debtors To Pay Certain
18 Prepetition Reimbursable Employee Expenses, Health Plan Claims, Insurance Premiums And
19 Administrative Fees, (b) Authorizing The Debtors To Make Deductions From Employees' Paychecks;
20 And (c) Authorizing And Directing Banks And Other Financial Institutions To Honor All Checks
21 And Electronic Payment Requests Made By The Debtors Related To The Foregoing;

22 7. Debtors' Motion For Authorization to (1) Honor Prepetition Warranty and Sales
23 Incentive Obligations, And (B) Continue Warranty and Sales Incentive Programs Postpetition;

24 8. Debtors' Motion For An Order (a) Authorizing (i) Maintenance Of Consolidated
25 Creditor And Equity Holder Lists and (ii) Filing Consolidated List Of Top Fifty Unsecured Creditors,

26
27 ¹ The debtors are providing notice of this Motion and including this Motion in the agenda for
28 the First Day Hearing, but the court may grant some or all of the relief requested herein in
 advance of the First Day Hearing.

1 (b) Extending Time For Debtors To File Schedules, Statements Of Financial Affairs and Other
2 Information Required By The U.S. Trustee, And (c) Establishing Certain Notice And Case
3 Management Procedures;

4 9. Debtors' Motion Pursuant To Sections 105, 363 and 1107 Of The Bankruptcy Code
5 and Bankruptcy Rule 6003 For Authorization To Pay Common Carriers And Other Critical Claims
6 Relating to Goods And Materials In Transit (the "Common Carriers Motion");

7 10. Debtors' Application For An Order (a) Appointing Kurtzman Carson Consultants LLC
8 As Claims And Noticing Agent And (b) Approving The Form And Manner Of Notice Of Case
9 Commencement;

10 11. Submission Of Unpublished Decisions In Support Of First Day Pleadings Pursuant To
11 Local Bankruptcy Rule 1002-1(I)(4).

12 In support of the First Day Pleadings, the Debtors have also filed (i) the Declaration of
13 Andrew M. Griffiths In Support of First Day Pleadings, (ii) the Declaration of Michael Shearin In
14 Support of the Employee Motion, and (iii) the Declaration of Martin Lewis In Support of the Dealer
15 Motion.

16 **ANY PARTY WISHING TO OBTAIN COPIES OF ANY OF THE FIRST DAY**
17 **PLEADINGS SHOULD CONTACT THE PROPOSED CLAIMS AND NOTICING AGENT,**
18 Kurtzman Carson Consultants LLC, 2335 Alaska Ave., El Segundo, CA 90245, Attn: Albert H.
19 Kass, Telephone: (310) 776-7360, Fax: (310) 776-8360, email: FleetwoodInfo@kccllc.com. The
20 Debtors prefer that requests for copies of motions be submitted by email. Copies of the First Day
21 Pleadings may also be viewed free of charge at the website operated by Kurtzman Carson
22 Consultants at **www.kccllc.net/fleetwood**.

23 **PLEASE TAKE FURTHER NOTICE** that a hearing to consider the First Day Pleadings
24 will take place before the Honorable Meredith A. Jury, in Courtroom 302, located at the United States
25 Bankruptcy Court, 3420 Twelfth Street, Riverside, CA, 92501 on March 12, 2009 at 2:00 p.m.
26 (PDT).

27 **PLEASE TAKE FURTHER NOTICE** that any response to any of the First Day Pleadings,
28 written or oral, must be presented before or at the time of the hearing on March 12, 2009 at 2:00 p.m.

1 (PDT), and, if submitted in writing, must be (a) filed with the Clerk of the Court at 3420 Twelfth
2 Street, Riverside, CA 92501; (b) served via facsimile or email upon counsel for the Debtors as
3 follows: Attn: Craig H. Millet, fax: (949) 475-4651; email: cmillet@gibsondunn.com, (c) served via
4 facsimile or email upon the Office of the United States Trustee as follows: Office of the United States
5 Trustee, Attn: Frank Cadigan, Loring Building, 3685 Main Street, Suite 300, Riverside, CA 92501,
6 fax: (951) 276-6973, email: Frank.Cadigan@usdoj.gov; and (d) delivered as a courtesy copy to the
7 Chambers of Judge Jury, United States Bankruptcy Court, 3420 Twelfth Street, Suite 345, Riverside,
8 CA 92501.

9 **PLEASE TAKE FURTHER NOTICE** that the failure to respond, in writing or orally,
10 before or at the time of the hearing may be deemed by the Court to be a lack of objection to the relief
11 requested in the First Day Pleadings.

12 Dated: March 10, 2009

13 CRAIG H. MILLET
14 SOLMAZ KRAUS
15 GIBSON, DUNN & CRUTCHER LLP

16 By: _____ /s/ Craig H. Millet
17 Craig H. Millet

18 Proposed Attorneys for
19 Debtors and Debtors in Possession

20 100559604_4.DOC