

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION**

In re:)	Chapter 11
)	
FIBRANT, LLC, et al.,¹)	Case No. 18-10274
)	
Debtors.)	(Joint Administration Requested)
<hr/>		

**DEBTORS' MOTION FOR ESTABLISHMENT OF PROCEDURES FOR MONTHLY
COMPENSATION AND REIMBURSEMENT OF EXPENSES OF PROFESSIONALS**

Fibrant, LLC (“Fibrant”) and its affiliated debtors-in-possession (collectively, the “Debtors”) file this *Motion for Establishment of Procedures for Monthly Compensation and Reimbursement of Expenses of Professionals* (the “Motion”). In support of this Motion, the Debtors respectfully represent as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334. Consideration of this Motion is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue of this proceeding is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.
2. The statutory predicates for the relief requested herein are Sections 105, 345, 1107 and 1108 of title 11 of the United States Code (“Bankruptcy Code”).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are: Fibrant, LLC (6694); Evergreen Nylon Recycling, LLC (7625); Fibrant Center South, LLC (8270); and Georgia Monomers Company, LLC (0042).

BACKGROUND

3. On February 23, 2018 (the “Petition Date”), the Debtors filed voluntary petitions with the Court under chapter 11 of the Bankruptcy Code.

4. The factual background relating to the Debtors’ commencement of these cases is set forth in detail in the *Declaration of David Leach in Support of First-Day Motions and Applications* (the “First-Day Declaration”),² filed on the Petition Date and incorporated herein by reference.

5. The Debtors have continued in possession of their properties and have continued to operate and manage their business as debtors-in-possession pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code.

6. As of the date of this filing, no official committee of unsecured creditors has been appointed in these cases, and no request has been made for the appointment of a trustee or examiner.

RELIEF REQUESTED

7. By this Motion, the Debtors respectfully request the entry of an order, pursuant to Sections 105(a) and 331 of the Bankruptcy Code and Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), establishing procedures by which professionals approved under Sections 327 and 1103 of the Bankruptcy Code by the Court in these cases (the “Professionals”) may obtain monthly payment of a portion of their fees and expenses, subject to review and adjustment in connection with regular fee applications filed with the Court.

² Capitalized terms that are used but not defined in this Motion have the meanings ascribed to such terms in the First-Day Declaration.

BASIS FOR RELIEF

8. At substantially the same time as the filing of this Motion, the Debtors have filed applications seeking approval, pursuant to Bankruptcy Code Section 327(a), of the employment of King & Spalding LLP and Klosinski Overstreet, LLP as their counsel, Alvarez & Marsal North America LLC as their financial advisors, and Ramboll Environ US Corporation as their environmental advisors. The Debtors anticipate that they may need to retain other professionals under Bankruptcy Code Section 327 as these cases progress.

9. The Debtors believe that the relief requested in this Motion will streamline the professional compensation process and enable the Court and all other parties to monitor the professional fees incurred in these cases more effectively.

10. Briefly stated, the requested procedures would permit each Professional to serve on counsel to the Debtors, the Office of the United States Trustee, and counsel for any official committee appointed in these cases, a statement of fees and expenses incurred by the Professional during the immediately preceding month (a “Monthly Statement”). The Debtors would be authorized to pay each Professional ninety percent (90%) of the fees and one hundred percent (100%) of the expenses requested in the Monthly Statement in the absence of an objection received within ten days after service of the Monthly Statement. All fees and expenses of each Professional retained under Sections 327 or 1103 of the Bankruptcy Code, whether or not paid or objected to in connection with a Monthly Statement, would remain subject to review and approval by the Court in connection with interim and final fee applications under Section 331.³

11. The Debtors propose that these procedures also apply to members of any official committee appointed in these cases seeking reimbursement of expenses pursuant to Section

³ The proposed procedures are set forth in detail in the proposed order attached hereto as Exhibit A.

503(b)(3)(F) of the Bankruptcy Code. However, these procedures will not apply to professionals retained in the ordinary course of business pursuant to the *Debtors' Motion for Authority to Retain and Compensate Professionals Used in the Ordinary Course of Business* (Docket No. []) or those retained pursuant to 28 U.S.C. § 156 (in the case of the claims agent).

12. In addition to minimizing the financial hardship on the Professionals, who must invest significant resources in these cases, monthly compensation procedures will enable the Debtors to monitor the costs of administration of their estates and forecast level cash flows. Moreover, these procedures will allow the Court and parties-in-interest, including the United States Trustee, to ensure the reasonableness and necessity of compensation sought in these cases.

13. Section 331, which generally permits professionals to file fee applications every one hundred and twenty days, expressly contemplates that professionals may be compensated more often "if the court permits." Relief similar to that requested herein has been granted by courts in other substantial chapter 11 cases within Georgia. *See, e.g., In re S. Reg'l Health Sys., Inc.*, Case No. 15-64266 (Bankr. N.D. Ga. Aug. 28, 2015) (Hagenau, J.) [Docket No. 194]; *In re Cagle's Inc.*, Case No. 11-80202 (Bankr. N.D. Ga. Nov. 28, 2011) (Bihary, J.) [Docket No. 157]; *In re Sea Island Co.*, Case No. 10-21034 (Bankr. S.D. Ga. Sept. 10, 2010) (Dalis, J.) [Docket No. 169]; *In re TitleMax Holdings, LLC*, Case No. 09-40805 (Bankr. S.D. Ga. Apr. 23, 2009) (Davis, J.) [Docket No. 137]; *In re AtheroGenics, Inc.*, Case No. 08-78200 (Bankr. N.D. Ga. Oct. 16, 2008) (Massey, J.) [Docket No. 50]; *In re Titan Fin. Group II, LLC*, Case No. 06-70852 (Bankr. N.D. Ga. Sept. 25, 2006) (Diehl, J.) [Docket No. 132]; *In re Allied Holdings, Inc.*, Case No. 05-12515 (Bankr. N.D. Ga. Aug. 24, 2005) (Drake, J.) [Docket No. 208]; *In re Friedman's Inc.*, Case No. 05-40129 (Bankr. S.D. Ga. Jan. 20, 2005) (Davis, J.) [Docket No. 44]; *In re Rhodes, Inc.*, Case No. 04-78434 (Bankr. N.D. Ga. Nov. 8, 2004) (Diehl, J.) [Docket No. 54]; *In re*

Durango Georgia Paper Co., Case No. 02-21669 (Bankr. S.D. Ga. Nov. 26, 2002) (Davis, J.) [Docket No. 280].

14. For the foregoing reasons, the Debtors believe that granting the relief requested herein is appropriate and in the best interest of their estates.

NOTICE

15. Notice of this Motion has been provided to: (a) the Office of the United States Trustee for the Southern District of Georgia; (b) the holders of the 20 largest unsecured claims against the Debtors on a consolidated basis; (c) the agent to lenders that previously asserted a blanket lien on Fibrant's assets; (d) the Internal Revenue Service; (e) the United States Attorney's Office for the Southern District of Georgia; (f) the Office of the Georgia Attorney General; (g) the Georgia Department of Revenue; (h) the United States Environmental Protection Agency, (i) the Georgia Environmental Protection Division; (j) parties receiving the "first-day" motions filed by the Debtors; (k) Koninklijke DSM, N.V. ("DSM") and DSM Coating Resins, Inc.; (l) ChemicalInvest Holding, B.V.; and (m) any other party that has requested notice pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested, the Debtors submit that no further notice is necessary.

CONCLUSION

WHEREFORE, the Debtors respectfully request that this Court:

- (a) enter an order in the form attached hereto as Exhibit A establishing procedures for monthly compensation and reimbursement of expenses of professionals; and
- (b) grant the Debtors such other and further relief as is just and proper.

Dated: February 28, 2018
Augusta, Georgia

Respectfully submitted,

KING & SPALDING LLP

/s/ Paul K. Ferdinands _____

Paul K. Ferdinands
Georgia Bar No. 258623
pferdinands@kslaw.com
Jonathan W. Jordan
Georgia Bar No. 404874
jjordan@kslaw.com
Sarah L. Primrose
Georgia Bar No. 532582
sprimrose@kslaw.com
1180 Peachtree Street
Atlanta, Georgia 30309-3521
Telephone: (404) 572-4600
Facsimile: (404) 572-5100

and

KLOSINSKI OVERSTREET, LLP

James C. Overstreet Jr.
Georgia Bar No. 556005
jco@klosinski.com
1229 Augusta West Parkway
Augusta, GA 30909
Telephone: (706) 863-2255
Facsimile: (706) 863-5885

PROPOSED COUNSEL FOR THE
DEBTORS-IN-POSSESSION

EXHIBIT A
Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION**

In re:)	Chapter 11
)	
FIBRANT, LLC, et al.,¹)	Case No. 18-10274
)	
)	
Debtors.)	Jointly Administered
<hr/>		

**ORDER ESTABLISHING PROCEDURES FOR MONTHLY COMPENSATION
AND REIMBURSEMENT OF EXPENSES OF PROFESSIONALS**

This matter is before the Court on the *Motion for Establishment of Procedures for Monthly Compensation and Reimbursement of Expenses of Professionals* (the “Motion”) of Fibrant, LLC and its affiliated debtors-in-possession (collectively, the “Debtors”). All capitalized terms used but not defined herein shall have the meanings given to them in the Motion.

The Court has considered the Motion, the *Declaration of David Leach in Support of First-Day Motions and Applications*, and the matters reflected in the record of the hearing held

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are: Fibrant, LLC (6694); Evergreen Nylon Recycling, LLC (7625); Fibrant Center South, LLC (8270); and Georgia Monomers Company, LLC (0042).

on the Motion on _____, 2018. It appears that the Court has jurisdiction over this proceeding; that this is a core proceeding; that notice of this Motion has been provided to: (a) the Office of the United States Trustee for the Southern District of Georgia; (b) the holders of the 20 largest unsecured claims against the Debtors on a consolidated basis; (c) the agent to lenders that previously asserted a blanket lien on Fibrant's assets; (d) the Internal Revenue Service; (e) the United States Attorney's Office for the Southern District of Georgia; (f) the Office of the Georgia Attorney General; (g) the Georgia Department of Revenue; (h) the United States Environmental Protection Agency, (i) the Georgia Environmental Protection Division; (j) parties receiving the "first-day" motions filed by the Debtors; (k) Koninklijke DSM, N.V. ("DSM") and DSM Coating Resins, Inc.; (l) ChemicalInvest Holding, B.V.; and (m) any other party that has requested notice pursuant to Bankruptcy Rule 2002; that no further notice is necessary; that the relief sought in the Motion is in the best interests of the Debtors, their estates, and their creditors; and that good and sufficient cause exists for such relief.

Accordingly, it is hereby ORDERED as follows:

1. The Motion (Docket No. ___) is GRANTED.
2. Except as may otherwise be provided in an order of this Court authorizing the retention of a specific professional, any professional whose retention is approved by this Court pursuant to Sections 327 and 1103 of the Bankruptcy Code may seek monthly compensation in accordance with the following procedures:

- (a) Within thirty (30) days after the end of a month for which compensation is sought, each Professional seeking compensation shall serve a monthly statement (the "Monthly Statement"), by hand delivery, electronic mail, or overnight delivery, on (i) Jonathan W. Jordan, King & Spalding LLP, 1180 Peachtree Street, Atlanta, Georgia 30309-3521; (ii) the U.S. Trustee, Office of the United States Trustee, Johnson Square Business Center, Suite 725, 2 East Bryan Street Savannah, GA 31401; and (iii) counsel for any official committee appointed in these cases.

- (b) For each Professional paid on an hourly basis, each Monthly Statement shall contain a list of individuals and their respective titles who provided services during the statement period, their respective billing rates, the aggregate hours spent by each individual, contemporaneously maintained time entries for each individual in increments of tenths of an hour, and a reasonably detailed breakdown of disbursements incurred. The Professional may redact portions of the time entries to protect attorney-client privilege or attorney work product information.
- (c) In the event that an interested party has an objection to the compensation or reimbursement sought in a particular Monthly Statement, he or she shall, within ten days after service of the Monthly Statement, serve upon the Professional whose statement is objected to and the other persons designated in paragraph (a) above a written "Notice of Objection to Fee Statement," setting forth the nature of the objection, the specific grounds therefore, and the amount of fees or expenses at issue.
- (d) After the expiration of the ten-day period described above, the Debtors shall promptly pay 90% of the fees and 100% of the expenses identified in each Monthly Statement to which no objection has been served.
- (e) If the Debtors receive an objection to a particular Monthly Statement, they shall withhold payment of that portion of the Monthly Statement to which the objection is directed and shall promptly pay the remainder of the fees and expenses in the percentages set forth in the preceding paragraph.
- (f) If any objecting party resolves a dispute with a Professional, the objecting party (or the Debtors, with the consent of the objecting party) shall serve written notice on the persons designated in paragraph (a) above that the objection is withdrawn and shall describe the terms of the resolution. The Debtors shall promptly pay that portion of the Monthly Statement at issue that is no longer subject to an objection in the percentages set forth in paragraph (d) above.
- (g) Any objection that is not resolved by the parties shall be preserved and presented to the Court at the next interim or final fee application hearing.
- (h) The service or lack of an objection in accordance with paragraph (c) above shall not prejudice the objecting party's right to object to any fee application made to the Court in accordance with the Bankruptcy Code on any ground, whether raised in the objection or not. Furthermore, the decision by any party not to object to a Monthly Statement shall not be a waiver of any kind or prejudice that party's right to object to any fee application subsequently made to the Court.
- (i) Approximately every 120 days, but no more than approximately every 180 days, each Professional retained under Sections 327 or 1103 of the

Bankruptcy Code shall serve and file with the Court, pursuant to Sections 330 and 331 of the Bankruptcy Code and Bankruptcy Rule 2016, an application for interim or final approval and allowance of compensation and reimbursement of expenses, including compensation previously paid by the Debtors on the basis of a Monthly Statement.

- (j) Neither the payment of, nor the failure to pay, in whole or in part, monthly compensation and reimbursement as provided herein shall have any effect on this Court's interim or final allowance of compensation or reimbursement of expenses of any Professional retained under Sections 327 or 1103 of the Bankruptcy Code.
- (k) Counsel for any official committee appointed in these cases may, in accordance with the foregoing procedures, collect and submit statements of expenses allowable under Section 503(b)(3)(F), with supporting vouchers, from members of such committee.

3. The provisions of this Order shall not apply to any professional retained pursuant to the *Order Authorizing Debtors to Retain and Compensate Professionals Used in the Ordinary Course of Business* (Docket No. ___) or those retained pursuant to 28 U.S.C. § 156 (in the case of the claims agent).

4. The Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

5. Counsel for the Debtors are directed to serve a copy of this Order on: (a) the Office of the United States Trustee for the Southern District of Georgia; (b) the holders of the 20 largest unsecured claims against the Debtors on a consolidated basis; (c) the agent to lenders that previously asserted a blanket lien on Fibrant's assets; (d) the Internal Revenue Service; (e) the United States Attorney's Office for the Southern District of Georgia; (f) the Office of the Georgia Attorney General; (g) the Georgia Department of Revenue; (h) the United States Environmental Protection Agency, (i) the Georgia Environmental Protection Division; (j) parties receiving the "first-day" motions filed by the Debtors; (k) Koninklijke DSM, N.V. and DSM Coating Resins, Inc.; (l) ChemicaInvest Holding, B.V.; and (m) any other party that has

requested notice pursuant to Bankruptcy Rule 2002, within three days of the entry of this Order and to file a certificate of service with the Clerk of the Court.

END OF DOCUMENT

Prepared and presented by:

KING & SPALDING LLP

/s/ Paul K. Ferdinands

Paul K. Ferdinands

Georgia Bar No. 258623

pferdinands@kslaw.com

Jonathan W. Jordan

Georgia Bar No. 404874

jjordan@kslaw.com

Sarah L. Primrose

Georgia Bar No. 532582

sprimrose@kslaw.com

1180 Peachtree Street

Atlanta, Georgia 30309-3521

Telephone: (404) 572-4600

Facsimile: (404) 572-5100

and

KLOSINSKI OVERSTREET, LLP

James C. Overstreet Jr.

Georgia Bar No. 556005

jco@klosinski.com

1229 Augusta West Parkway

Augusta, GA 30909

Telephone: (706) 863-2255

Facsimile: (706) 863-5885

PROPOSED COUNSEL FOR THE
DEBTORS-IN-POSSESSION

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION**

In re:)	Chapter 11
)	
FIBRANT, LLC, <i>et al.</i>,¹)	Case No. 18-10274
)	
Debtors.)	Jointly Administered
<hr style="width: 40%; margin-left: 0;"/>		

**ORDER ESTABLISHING PROCEDURES FOR MONTHLY COMPENSATION
AND REIMBURSEMENT OF EXPENSES OF PROFESSIONALS**

This matter is before the Court on the *Motion for Establishment of Procedures for Monthly Compensation and Reimbursement of Expenses of Professionals* (the “Motion”) of Fibrant, LLC and its affiliated debtors-in-possession (collectively, the “Debtors”). All capitalized terms used but not defined herein shall have the meanings given to them in the Motion.

The Court has considered the Motion, the *Declaration of David Leach in Support of First-Day Motions and Applications*, and the matters reflected in the record of the hearing held

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are: Fibrant, LLC (6694); Evergreen Nylon Recycling, LLC (7625); Fibrant Center South, LLC (8270); and Georgia Monomers Company, LLC (0042).

on the Motion on April 24, 2018. It appears that the Court has jurisdiction over this proceeding; that this is a core proceeding; that notice of this Motion has been provided to: (a) the Office of the United States Trustee for the Southern District of Georgia; (b) the holders of the 20 largest unsecured claims against the Debtors on a consolidated basis; (c) the agent to lenders that previously asserted a blanket lien on Fibrant's assets; (d) the Internal Revenue Service; (e) the United States Attorney's Office for the Southern District of Georgia; (f) the Office of the Georgia Attorney General; (g) the Georgia Department of Revenue; (h) the United States Environmental Protection Agency, (i) the Georgia Environmental Protection Division; (j) parties receiving the "first-day" motions filed by the Debtors; (k) Koninklijke DSM, N.V. and DSM Coating Resins, Inc.; (l) ChemicalInvest Holding, B.V.; and (m) any other party that has requested notice pursuant to Bankruptcy Rule 2002; that no further notice is necessary; that the relief sought in the Motion is in the best interests of the Debtors, their estates, and their creditors; and that good and sufficient cause exists for such relief.

Accordingly, it is hereby ORDERED as follows:

1. The Motion (Docket No. 29) is GRANTED as set forth in this Order.
2. Except as may otherwise be provided in an order of this Court authorizing the retention of a specific Professional, any Professional whose retention is approved by this Court pursuant to Sections 327 and 1103 of the Bankruptcy Code may seek monthly compensation in accordance with the following procedures:

- (a) Within thirty (30) days after the end of a month for which compensation is sought, each Professional seeking compensation shall serve a monthly statement (the "Monthly Statement"), by hand delivery, electronic mail, or overnight delivery, on (i) Jonathan W. Jordan, King & Spalding LLP, 1180 Peachtree Street, Atlanta, Georgia 30309-3521; (ii) Counsel for the U.S. Trustee, Office of the United States Trustee, Johnson Square Business Center, Suite 725, 2 East Bryan Street Savannah, GA 31401; and

(iii) Jeffrey D. Prol, Lowenstein Sandler LLP, One Lowenstein Drive, Roseland, New Jersey 07068.

- (b) For each Professional paid on an hourly basis, each Monthly Statement shall contain a list of individuals and their respective titles who provided services during the statement period, their respective billing rates, the aggregate hours spent by each individual, contemporaneously maintained time entries for each individual in increments of tenths of an hour, and a reasonably detailed breakdown of disbursements incurred. The Professional may redact portions of the time entries to protect attorney-client privilege or attorney work product information.
- (c) In the event that an interested party has an objection to the compensation or reimbursement sought in a particular Monthly Statement, he or she shall, within 20 days after service of the Monthly Statement, serve upon the Professional whose statement is objected to and the other persons designated in paragraph (a) above a written "Notice of Objection to Fee Statement," setting forth the nature of the objection, the specific grounds therefore, and the amount of fees or expenses at issue.
- (d) After the expiration of the 20-day period described above, the Debtors shall promptly pay 90% of the fees and 100% of the expenses identified in each Monthly Statement to which no objection has been served.
- (e) If the Debtors receive an objection to a particular Monthly Statement, they shall withhold payment of that portion of the Monthly Statement to which the objection is directed and shall promptly pay the remainder of the fees and expenses in the percentages set forth in the preceding paragraph.
- (f) If any objecting party resolves a dispute with a Professional, the objecting party (or the Debtors, with the consent of the objecting party) shall serve written notice on the persons designated in paragraph (a) above that the objection is withdrawn and shall describe the terms of the resolution. The Debtors shall promptly pay that portion of the Monthly Statement at issue that is no longer subject to an objection in the percentages set forth in paragraph (d) above.
- (g) Any objection that is not resolved by the parties shall be preserved and presented to the Court at the next interim or final fee application hearing.
- (h) The service or lack of an objection in accordance with paragraph (c) above shall not prejudice the objecting party's right to object to any fee application made to the Court in accordance with the Bankruptcy Code on any ground, whether raised in the objection or not. Furthermore, the decision by any party not to object to a Monthly Statement shall not be a waiver of any kind or prejudice that party's right to object to any fee application subsequently made to the Court.

- (i) Approximately every 120 days, but no more than approximately every 180 days, each Professional retained under Sections 327 or 1103 of the Bankruptcy Code shall serve and file with the Court, pursuant to Sections 330 and 331 of the Bankruptcy Code and Bankruptcy Rule 2016, an application for interim or final approval and allowance of compensation and reimbursement of expenses, including compensation previously paid by the Debtors on the basis of a Monthly Statement.
- (j) Neither the payment of, nor the failure to pay, in whole or in part, monthly compensation and reimbursement as provided herein shall have any effect on this Court's interim or final allowance of compensation or reimbursement of expenses of any Professional retained under Sections 327 or 1103 of the Bankruptcy Code.
- (k) Counsel for any official committee appointed in these cases may, in accordance with the foregoing procedures, collect and submit statements of expenses allowable under Section 503(b)(3)(F), with supporting vouchers, from members of such committee.

3. The provisions of this Order shall not apply to any professional retained pursuant to the *Debtors Motion for Authority to Retain and Compensate Professionals Used in the Ordinary Course of Business* (Docket No. 30) or those retained pursuant to 28 U.S.C. § 156 (in the case of the claims agent).

4. The Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

5. Counsel for the Debtors are directed to serve a copy of this Order on all parties listed on the Master Service List within three days of the entry of this Order and to file a certificate of service with the Clerk of the Court.

END OF DOCUMENT

Prepared and presented by:

KING & SPALDING LLP

/s/ Paul K. Ferdinands

Paul K. Ferdinands

Georgia Bar No. 258623

pferdinands@kslaw.com

Jonathan W. Jordan

Georgia Bar No. 404874

jjordan@kslaw.com

Sarah L. Primrose

Georgia Bar No. 532582

sprimrose@kslaw.com

1180 Peachtree Street

Atlanta, Georgia 30309-3521

Telephone: (404) 572-4600

Facsimile: (404) 572-5100

and

KLOSINSKI OVERSTREET, LLP

James C. Overstreet Jr.

Georgia Bar No. 556005

jco@klosinski.com

1229 Augusta West Parkway

Augusta, GA 30909

Telephone: (706) 863-2255

Facsimile: (706) 863-5885

COUNSEL FOR THE
DEBTORS-IN-POSSESSION