

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

OSG HOLDINGS, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-90799 (CML)

(Joint Administration Requested)

NOTICE OF VIRTUAL HEARING ON FIRST DAY MOTIONS

PLEASE TAKE NOTICE that on October 15, 2023 (the “Petition Date”), OSG Holdings, Inc. and its affiliated debtors and debtors in possession (collectively, the “Debtors”) filed voluntary petitions for relief under chapter 11 of title 11 of the U.S. Code, U.S.C. §§ 101-1532 (the “Bankruptcy Code”) with the United States Bankruptcy Code for the Southern District of Texas, Houston Division.

PLEASE TAKE FURTHER NOTICE that in accordance with Sections A and I of the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas* (the “Complex Case Procedures”), a virtual hearing is set for **October 17, 2023 at 3:00 p.m.** (Prevailing Central Time), before the Honorable Judge Christopher M. Lopez to consider the following motions:

First Day Motions

1. **Complex Case Designation.** Notice of Designation as Complex Chapter 11 Case [Docket No. 7].
2. **Joint Administration.** Debtors’ Emergency Motion for Entry of an Order (i) Directing Joint Administration of the Chapter 11 Cases and (ii) Granting Related Relief [Docket No. 8].

¹ The debtors in these chapter 11 cases, along with the last four digits of each debtor’s federal tax identification number are: Applied Information Group, Inc. (7381); Diamond Marketing Solutions Group, Inc. (3531); DoublePositive Marketing Group, Inc. (8221); E-statement.com Corp. (1974); Globalex Corporation (5365); JJT Enterprises, Inc. (7792); Mansell Group Holding Company (9354); Mansell Group, Inc. (7898); Metrogroup PD-WI Acquisition, LLC (5979); Microdynamics Corporation (0423); Microdynamics Group Nebraska, Inc. (5711); Microdynamics Transactional Mail, LLC (4060); National Business Systems, Inc. (6946); National Data Services of Chicago, Inc. (9009); NCP Solutions, LLC (5620); OSG Group Holdings, Inc. (0311); OSG Group TopCo, LLC (0904); OSG Holdings, Inc. (2036); OSG Intermediate Holdings, Inc. (1288); Output Services Group, Inc. (8044); Payments Business Corporation (5590); The Pisa Group, Inc. (6299); PPS Business Corporation (6432); SouthData, Inc. (5336); Telereach, Inc. (4444); The Garfield Group, Inc. (9966); WhatCounts, Inc. (9306); and Words, Data and Images, LLC (2248). The debtors’ service address is 900 Kimberly Drive, Carol Stream, Illinois 60188.



3. **Creditor Matrix Motion.** Debtors' Emergency Motion for Entry of an Order (i) Authorizing Debtors to File a Consolidated (A) Creditor Matrix and (B) Top 30 creditors List, (ii) Authorizing Redaction of Certain Personal Identification Information, and (iii) Granting Related Relief [Docket No. 9].
4. **KCC Retention Application.** Debtors' Emergency *Ex Parte* Application for Entry of an Order Authorizing the Employment and Retention of Kurtzman Carson Consultants LLC as Claims, Noticing, and Solicitation Agent [Docket No. 10].
5. **Tax Motion.** Debtors' Emergency Motion for Entry an Order (i) Authorizing Debtors to Pay Certain Prepetition Taxes and Fees and (ii) Granting Related Relief [Docket No. 11].
6. **Insurance Motion.** Debtors' Emergency Motion for Entry of Interim and Final Orders (A) Authorizing the Debtors to (i) Continue Insurance Coverage Entered into Prepetition and Satisfy Prepetition Obligations Related Thereto and (ii) Amend or Supplement Insurance Policies, and (B) Granting Related Relief [Docket No. 12].
7. **Utilities Motion.** Debtors' Emergency Motion for Entry of an Order (i)(A) Approving Debtors' Proposed form of Adequate Assurance of Payment for Future Utility Services, (B) Approving Debtors' Proposed Procedures for Resolving Additional Assurance Requests, and (C) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services; and (ii) Granting Related Relief [Docket No. 13].
8. **Trade Claims Motion.** Debtors' Emergency Motion for Entry of Interim and Final Orders (A) Authorizing the Payment of Prepetition Trade Claims of Certain Creditors in the Ordinary Course of Business and (B) Granting Related Relief [Docket No. 14].
9. **Wage Motion.** Debtors' Emergency Motion for Entry of an Order (i) Authorizing the Debtors to (a) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses, (B) Continue Employee Benefits Programs, and (ii) Granting Related Relief [Docket No. 15].
10. **Cash Management Motion.** Debtors' Emergency Motion for Entry of Interim and Final Orders (i) Authorizing Debtors to (A) Continue to Operate their Cash Management System, (B) Maintain Existing Bank Accounts and Business Forms and Honor Certain Prepetition Obligations Related Thereto, and (C) Maintain Divvy Cards in the Ordinary Course of Business; (ii) Authorizing Debtors to (a) Continue to Perform Intercompany Transactions and (B) Granting Administrative Expense Status for Postpetition Intercompany Claims; (iii) Extending Time for Debtors to Comply with Requirements Set Forth in 11 U.S.C. § 345(b); and (iv) Granting Related Relief [Docket No. 16].

11. **DIP Motion.** Debtors' Emergency Motion for Entry of Interim and Final Orders (i) Authorizing the Debtors to (A) Obtain Postpetition Financing, (B) Use Cash Collateral, (C) Grant Junior Secured Liens and Provide Claims with Superpriority Administrative Expense Status, and (D) Grant Adequate Protection to the Prepetition First Lien Secured Parties; (ii) Modifying the Automatic Stay; (iii) Scheduling a Final Hearing; and (iv) Granting Related Relief [Docket No.17].
12. **NOL Motion.** Debtors' Emergency Motion for Entry of an Order (i) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Equity Interests and (ii) Granting Related Relief [Docket No. 19].
13. **Combined Hearing.** Debtors' Emergency Motion for Entry of an Order (i) Scheduling a Combined Disclosure Statement Approval and Plan Confirmation Hearing, (ii) Conditionally Approving the Disclosure Statement, (iii) Establishing a Plan and Disclosure Statement Objection Deadline and Related Procedures, (iv) Approving the Solicitation Procedures, (v) Approving the Combined Notice, (vi) Conditionally Waiving the Requirement that the U.S. Trustee Convene a Meeting of Creditors and the Debtors File (a) Schedules and SOFAs and (B) Rule 2015.3 Financial Reports, and (vii) Granting Related Relief [Docket No. 20].

PLEASE TAKE FURTHER NOTICE that the First Day Hearing will be conducted virtually. No in-person attendee will be permitted. Audio communication will be by use of the Court's dial-in facility. You may access the facility at 1 (832) 917-1510. Once connected, you will be asked to enter the conference room number. Judge Lopez's conference room number is 590153. Video communication will be by use of the GoToMeeting platform. Connect via the free GoToMeeting application or click the link on Judge Lopez's home page <https://www.txs.uscourts.gov/page/united-states-bankruptcy-judge-christopher-m-lopez>. The meeting codes is "JudgeLopez". Click the settings icon in the upper right corner and enter your name under the personal information setting.

PLEASE TAKE FURTHER NOTICE that hearing appearances must be made electronically in advance of both electronic and in-person hearings. To make your electronic appearance, click the "Electronic Appearance" link on Judge Lopez's home page. Select the case name, complete the required fields and click "Submit" to complete your appearance.

PLEASE TAKE FURTHER NOTICE that all documents filed in these chapter 11 cases are available free of charge by visiting <https://www.kccllc.net/OSG>. Copies of any pleadings or papers filed with the Court may also be obtained by visiting the Court's website at <https://ecf/txsb.uscourts.gov> in accordance with the procedures and fee set forth therein.

Dated: October 15, 2023
Dallas, Texas

/s/ Marcus A. Helt

Marcus A Helt (Texas Bar No. 24052187)
MCDERMOTT WILL & EMERY LLP
2501 N. Harwood Street, Suite 1900
Dallas, Texas 75201-1664
Telephone: (214)295-8000
Facsimile: (972) 232-3098
Email: mhelt@mwe.com

-and-

Felicia Gerber Perlman (*pro hac vice* admission pending)
Bradley Thomas Giordano (*pro hac vice* admission pending)
Carole Wurzelbacher (*pro hac vice* admission pending)
MCDERMOTT WILL & EMERY LLP
444 West Lake Street
Chicago, Illinois 60606-0029
Telephone: (312) 372-2000
Facsimile: (312) 984-7700
Email: fperlman@mwe.com
bgiordano@mwe.com
cwurzelbacher@mwe.com

-and-

Gregg Steinman (*pro hac vice* admission pending)
MCDERMOTT WILL & EMERY LLP
333 SE 2nd Avenue, Suite 4500
Miami, Florida 33131
Telephone: (305) 329-4473
Facsimile: (305) 503-8805
Email: gsteinman@mwe.com

Proposed Counsel for the Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I certify that on October 15, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Marcus A. Helt

Marcus A Helt