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Debtors-in-Possession

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
CASE NO. 13-

Chapter 11
(Joint Administration Pending)

In re:

RIH ACQUISITIONS NJ, LLC, *et al.*,¹
Debtors-in-Possession.

**APPLICATION FOR EXPEDITED
CONSIDERATION OF FIRST DAY
MATTERS**

HEARING DATE AND TIME:
_____, 2013, at __: __ .m.

ORAL ARGUMENT REQUESTED

On November 6, 2013, RIH Acquisitions NJ, LLC d/b/a The Atlantic Club Casino Hotel and RIH Propco NJ, LLC, the within debtors and debtors-in-possession (the “**Debtors**”), filed voluntary petitions for relief pursuant to Chapter 11 of Title 11 of the United States Code (the “**Bankruptcy Code**”).

Proposed counsel for the Debtors request that the following relief be provided on a first day basis:

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor’s federal identification number are: RIH Acquisitions NJ, LLC d/b/a The Atlantic Club Casino Hotel (1695) and RIH Propco NJ, LLC (5454).



1. APPLICATION FOR DESIGNATION AS COMPLEX CHAPTER 11 CASES;
2. MOTION FOR AN ORDER DIRECTING THE JOINT ADMINISTRATION OF THE DEBTORS' CHAPTER 11 CASES PURSUANT TO FED. R. BANKR. P. 1015(b) AND GRANTING OTHER RELATED RELIEF;
3. MOTION FOR AN ORDER EXTENDING THE DEBTORS' TIME TO FILE SCHEDULES OF ASSETS AND LIABILITIES AND STATEMENTS OF FINANCIAL AFFAIRS PURSUANT TO FED. R. BANKR. P. 1007(c);
4. MOTION FOR AN ORDER: (A) AUTHORIZING RIH ACQUISITIONS NJ, LLC TO CONTINUE USING ITS EXISTING CASH MANAGEMENT SYSTEM; (B) AUTHORIZING CERTAIN DEBTORS TO CONTINUE USING THEIR BANK ACCOUNTS AND BUSINESS FORMS; AND (C) WAIVING THE DEBTORS' COMPLIANCE WITH INVESTMENT GUIDELINES UNDER 11 U.S.C. § 345(b);
5. MOTION FOR AN ORDER: (I) AUTHORIZING RIH ACQUISITIONS NJ, LLC TO (A) SATISFY AND, TO THE EXTENT APPLICABLE, DIRECTING ANY PAYROLL BANKS TO HONOR, PRE-PETITION GROSS SALARIES, PAYROLL TAXES AND RELATED OBLIGATIONS TO OR FOR THE BENEFIT OF THE DEBTORS' EMPLOYEES, AND (B) HONOR, IN ITS DISCRETION, PRE-PETITION SICK, VACATION, PERSONAL, AND SIMILAR THEMED DAYS; AND (II) GRANTING OTHER RELATED RELIEF;
6. MOTION FOR ENTRY OF AN ORDER AUTHORIZING RIH ACQUISITIONS NJ, LLC TO PAY CERTAIN PRE-PETITION TAXES AND FEES PURSUANT TO 11 U.S.C. §§ 507(a)(8) AND 105(a);
7. MOTION PURSUANT TO 11 U.S.C. § 105(a) FOR AN ORDER AUTHORIZING RIH ACQUISITIONS NJ, LLC TO HONOR CASINO CHIPS AND OTHER CUSTOMER-RELATED CLAIMS, PROGRAMS AND OBLIGATIONS;
8. MOTION FOR ENTRY OF: (I) AN INTERIM ORDER AUTHORIZING RIH ACQUISITIONS NJ, LLC TO PAY OR HONOR PREPETITION OBLIGATIONS TO CERTAIN CRITICAL VENDORS AND AUTHORIZING FINANCIAL INSTITUTIONS TO HONOR ALL RELATED CHECKS AND ELECTRONIC PAYMENT REQUESTS RELATED THERETO; AND (II) A FINAL ORDER;
9. MOTION FOR AN ORDER DIRECTING THE CREDIT CARD PROCESSOR TO HONOR THE PROCESSING AGREEMENT WITH RIH ACQUISITIONS NJ, LLC PENDING ASSUMPTION OR REJECTION PURSUANT TO 11 U.S.C. §§ 365 AND 105(a);
10. MOTION FOR AN ORDER: (A) GRANTING INTERIM RELIEF PURSUANT TO 11 U.S.C. § 366(b); (B) AUTHORIZING THE PAYMENT OF ADEQUATE ASSURANCE FOR POST-PETITION UTILITY SERVICES; (C) FIXING FINAL HEARING DATE TO DETERMINE ADEQUATE ASSURANCE; AND (D) GRANTING OTHER RELATED RELIEF;

11. MOTION FOR AN INTERIM AND FINAL ORDER: (I) AUTHORIZING THE DEBTORS TO OBTAIN SUPERPRIORITY, SENIOR SECURED POST-PETITION FINANCING PURSUANT TO 11 U.S.C. §§ 105, 361, 362, 364(c) AND 364(e); (II) SCHEDULING A FINAL HEARING PURSUANT TO FED. R. BANKR. P. 4001; AND (III) GRANTING OTHER RELATED RELIEF;
12. MOTION FOR AN ORDER AUTHORIZING RIH ACQUISITIONS NJ, LLC'S RETENTION AND COMPENSATION OF NON-LEGAL PROFESSIONALS UTILIZED BY IT IN THE ORDINARY COURSE OF BUSINESS *NUNC PRO TUNC* TO THE FILING DATE;
13. MOTION FOR AN ORDER AUTHORIZING THE RETENTION AND COMPENSATION OF NON-BANKRUPTCY LEGAL PROFESSIONALS *NUNC PRO TUNC* TO THE FILING DATE;
14. MOTION FOR AN ORDER AUTHORIZING RIH ACQUISITIONS NJ, LLC TO CONTINUE MAKING INSTALLMENT PAYMENTS UNDER A PREPETITION INSURANCE PREMIUM FINANCING AGREEMENT;
15. MOTION FOR AN ADMINISTRATIVE ORDER ESTABLISHING PROCEDURES FOR ALLOWANCE AND PAYMENT OF INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES TO PROFESSIONAL PERSONS; AND
16. MOTION FOR AN ORDER APPROVING THE DEBTORS' RETENTION OF KURTZMAN CARSON CONSULTANTS LLC AS CLAIMS AND NOTICING AGENT PURSUANT TO 28 U.S.C. § 156(c).

COLE, SCHOTZ, MEISEL,
FORMAN & LEONARD, P.A.
Proposed attorneys for RIH Acquisitions NJ, LLC, *et al.*,
Debtors-in-Possession

By: /s/ Michael D. Sirota
Michael D. Sirota
Warren A. Usatine
Ryan T. Jareck
Nicholas B. Vislocky, Esq.

DATED: November 6, 2013

NOTE: Each motion or application for which expedited consideration is requested shall be filed with the Clerk of the United States Bankruptcy Court for the District of New Jersey and served upon the United States Trustee and all affected parties.

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-2(c) COLE, SCHOTZ, MEISEL, FORMAN & LEONARD, P.A. A Professional Corporation Court Plaza North 25 Main Street P.O. Box 800 Hackensack, NJ 07602-0800 Michael D. Sirota, Esq. Warren A. Usatine, Esq. Ryan T. Jareck, Esq. Nicholas B. Vislocky, Esq. (201) 489-3000 (201) 489-1536 Facsimile Proposed attorneys for RIH Acquisitions NJ, LLC, <i>et al.</i> , Debtors-in-Possession	
In re: RIH ACQUISITIONS NJ, LLC, <i>et al.</i> , ¹ Debtors-in-Possession.	Case No. 13- (Jointly Administered) Judge: Chapter 11 Hearing Date and Time: _____, 2013, at __: __ .m.

**ORDER REGARDING APPLICATION FOR EXPEDITED
CONSIDERATION OF FIRST DAY MATTERS**

The relief set forth on the following pages, numbered two (2) through six (6), is hereby **ORDERED**.

¹ The Debtors in these Chapter 11 cases (along with the last four digits of each Debtor's federal identification number) are: RIH Acquisitions NJ, LLC d/b/a The Atlantic Club Casino Hotel (1695) and RIH Propco NJ, LLC (5454).

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Debtor: RIH ACQUISITIONS NJ, LLC, *et al.*
Case No. 13-
Caption of Order: ORDER REGARDING APPLICATION FOR EXPEDITED
CONSIDERATION OF FIRST DAY MATTERS

The bankruptcy cases were filed on November 6, 2013. An Application For Expedited Consideration of First Day Matters was filed thereafter. After review of the initial pleadings filed in these cases that have been designated by counsel as requiring expedited consideration, and for good cause shown,

IT IS HEREBY ORDERED that the following motions are set down for hearing before the United States Bankruptcy Court for the District of New Jersey, Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4th Floor, Camden, New Jersey 08101, Courtroom _____, before the Honorable _____, United States Bankruptcy Judge, at the date and time as set forth below:

Hearing Date and Time

APPLICATION FOR DESIGNATION AS
COMPLEX CHAPTER 11 CASES

November ____, 2013 at _____.m.

MOTION FOR AN ORDER DIRECTING THE
JOINT ADMINISTRATION OF THE DEBTORS'
CHAPTER 11 CASES PURSUANT TO
FED. R. BANKR. P. 1015(b) AND GRANTING
OTHER RELATED RELIEF

November ____, 2013 at _____.m.

MOTION FOR AN ORDER EXTENDING THE
DEBTORS' TIME TO FILE SCHEDULES OF
ASSETS AND LIABILITIES AND STATEMENTS
OF FINANCIAL AFFAIRS PURSUANT TO FED. R.
BANKR. P. 1007(c)

November ____, 2013 at _____.m.

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Debtor: RIH ACQUISITIONS NJ, LLC, *et al.*
Case No. 13-
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Hearing Date and Time

MOTION FOR AN ORDER: (A) AUTHORIZING RIH ACQUISITIONS NJ, LLC TO CONTINUE USING ITS EXISTING CASH MANAGEMENT SYSTEM; (B) AUTHORIZING CERTAIN DEBTORS TO CONTINUE USING THEIR BANK ACCOUNTS AND BUSINESS FORMS; AND (C) WAIVING THE DEBTORS' COMPLIANCE WITH INVESTMENT GUIDELINES UNDER 11 U.S.C. § 345(b)

November ____, 2013 at _____.m.

MOTION FOR AN ORDER: (I) AUTHORIZING RIH ACQUISITIONS NJ, LLC TO (A) SATISFY AND, TO THE EXTENT APPLICABLE, DIRECTING ANY PAYROLL BANKS TO HONOR, PRE-PETITION GROSS SALARIES, PAYROLL TAXES AND RELATED OBLIGATIONS TO OR FOR THE BENEFIT OF THE DEBTORS' EMPLOYEES, AND (B) HONOR, IN ITS DISCRETION, PRE-PETITION SICK, VACATION, PERSONAL, AND SIMILAR THEMED DAYS; AND (II) GRANTING OTHER RELATED RELIEF

November ____, 2013 at _____.m.

MOTION FOR ENTRY OF AN ORDER AUTHORIZING RIH ACQUISITIONS NJ, LLC TO PAY CERTAIN PRE-PETITION TAXES AND FEES PURSUANT TO 11 U.S.C. §§ 507(a)(8) AND 105(a)

November ____, 2013 at _____.m.

MOTION PURSUANT TO 11 U.S.C. § 105(a) FOR AN ORDER AUTHORIZING RIH ACQUISITIONS NJ, LLC TO HONOR CASINO CHIPS AND OTHER CUSTOMER-RELATED CLAIMS, PROGRAMS AND OBLIGATIONS

November ____, 2013 at _____.m.

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Debtor: RIH ACQUISITIONS NJ, LLC, *et al.*
Case No. 13-
Caption of Order: ORDER REGARDING APPLICATION FOR EXPEDITED
CONSIDERATION OF FIRST DAY MATTERS

Hearing Date and Time

MOTION FOR ENTRY OF: (I) AN INTERIM ORDER AUTHORIZING RIH ACQUISITIONS NJ, LLC TO PAY OR HONOR PREPETITION OBLIGATIONS TO CERTAIN CRITICAL VENDORS AND AUTHORIZING FINANCIAL INSTITUTIONS TO HONOR ALL RELATED CHECKS AND ELECTRONIC PAYMENT REQUESTS RELATED THERETO; AND (II) A FINAL ORDER

November ____, 2013 at _____.m.

MOTION FOR AN ORDER DIRECTING THE CREDIT CARD PROCESSOR TO HONOR THE PROCESSING AGREEMENT WITH RIH ACQUISITIONS NJ, LLC PENDING ASSUMPTION OR REJECTION PURSUANT TO 11 U.S.C. §§ 365 AND 105(a)

November ____, 2013 at _____.m.

MOTION FOR AN ORDER: (A) GRANTING INTERIM RELIEF PURSUANT TO 11 U.S.C. § 366(b); (B) AUTHORIZING THE PAYMENT OF ADEQUATE ASSURANCE FOR POST-PETITION UTILITY SERVICES; (C) FIXING FINAL HEARING DATE TO DETERMINE ADEQUATE ASSURANCE; AND (D) GRANTING OTHER RELATED RELIEF

November ____, 2013 at _____.m.

MOTION FOR AN INTERIM AND FINAL ORDER: (I) AUTHORIZING THE DEBTORS TO OBTAIN SUPERPRIORITY, SENIOR SECURED POST-PETITION FINANCING PURSUANT TO 11 U.S.C. §§ 105, 361, 362, 364(c) AND 364(e); (II) SCHEDULING A FINAL HEARING PURSUANT TO FED. R. BANKR. P. 4001; AND (III) GRANTING OTHER RELATED RELIEF

November ____, 2013 at _____.m.

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Debtor: RIH ACQUISITIONS NJ, LLC, *et al.*
Case No. 13-
Caption of Order: ORDER REGARDING APPLICATION FOR EXPEDITED
CONSIDERATION OF FIRST DAY MATTERS

Hearing Date and Time

MOTION FOR AN ORDER AUTHORIZING RIH
ACQUISITIONS NJ, LLC'S RETENTION AND
COMPENSATION OF NON-LEGAL
PROFESSIONALS UTILIZED BY IT IN THE
ORDINARY COURSE OF BUSINESS *NUNC PRO
TUNC* TO THE FILING DATE

November ____, 2013 at ____.m.

MOTION FOR AN ORDER AUTHORIZING THE
RETENTION AND COMPENSATION OF NON-
BANKRUPTCY LEGAL PROFESSIONALS *NUNC
PRO TUNC* TO THE FILING DATE

November ____, 2013 at ____.m.

MOTION FOR AN ORDER AUTHORIZING RIH
ACQUISITIONS NJ, LLC TO CONTINUE MAKING
INSTALLMENT PAYMENTS UNDER A
PREPETITION INSURANCE PREMIUM
FINANCING AGREEMENT

November ____, 2013 at ____.m.

MOTION FOR AN ADMINISTRATIVE ORDER
ESTABLISHING PROCEDURES FOR
ALLOWANCE AND PAYMENT OF INTERIM
COMPENSATION AND REIMBURSEMENT OF
EXPENSES TO PROFESSIONAL PERSONS

November ____, 2013 at ____.m.

MOTION FOR AN ORDER APPROVING THE
DEBTORS' RETENTION OF KURTZMAN
CARSON CONSULTANTS LLC AS CLAIMS AND
NOTICING AGENT PURSUANT TO 28 U.S.C. §
156(c)

November ____, 2013 at ____.m.

IT IS FURTHER ORDERED that service of the within Order shall be made in
accordance with the Court's *General Order Adopting Guidelines Governing First Day Matters*;
and

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Debtor: RIH ACQUISITIONS NJ, LLC, *et al.*
Case No. 13-
Caption of Order: ORDER REGARDING APPLICATION FOR EXPEDITED
CONSIDERATION OF FIRST DAY MATTERS

IT IS FURTHER ORDERED that objections and/or responses to First Day Matters, if any, shall be made in accordance with the Court's *General Order Adopting Guidelines Governing First Day Matters*.