

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION, CANTON

-----X
 In re : Case No. 17-61735
 SCI DIRECT, LLC :
 : Chapter 11
 :
 Debtor and : Chief Judge Russ Kendig
 Debtor-in-Possession :
 :
 (Employer Tax I.D. No. 27-1695346) :
 -----X

In re : Case No. 17-61736
 SUAREZ CORPORATION INDUSTRIES :
 : Chapter 11
 :
 : Chief Judge Russ Kendig
 Debtor and :
 Debtor-in-Possession :
 :
 (Employer Tax I.D. No. 34-1132690) :
 -----X

In re : Case No. 17-61737
 RETAIL PARTNER ENTERPRISES, LLC :
 : Chapter 11
 :
 Debtor and : Chief Judge Russ Kendig
 Debtor-in-Possession :
 :
 (Employer Tax I.D. No. 27-1695537) :
 -----X



1761735170807000000000008

In re : Case No. 17-61738
MEDIA SERVICE CORPORATION :
: Chapter 11
: Debtor and : Chief Judge Russ Kendig
Debtor-in-Possession :
: (Employer Tax I.D. No. 34-1185822) :
-----X

NOTICE OF FILING OF DEBTORS' FIRST DAY PAPERS AND MOTIONS

PLEASE TAKE NOTICE OF THE FOLLOWING:

The above-captioned debtor and debtor in possession (the "Debtor"), has filed the motions and applications listed below on August 7, 2017.

**APPLICATION OF THE DEBTOR FOR AUTHORITY
TO RETAIN AND EMPLOY ANTHONY J. DEGIROLAMO
AS COUNSEL FOR THE DEBTOR**

**APPLICATION OF THE DEBTOR FOR AUTHORITY
TO RETAIN AND EMPLOY THE PHILLIPS ORGANIZATION
AS ACCOUNTANT AND FINANCIAL ADVISOR FOR THE DEBTORS**

**APPLICATION OF THE DEBTOR FOR AUTHORITY
TO RETAIN AND EMPLOY CRAIG T. CONLEY, ESQ.
AS SPECIAL COUNSEL FOR THE DEBTOR**

**APPLICATION FOR THE ENTRY OF AN ORDER AUTHORIZING THE
RETENTION AND EMPLOYMENT OF KURTZMAN CARSON
CONSULTANTS LLC AS NOTICE, BALLOTING, AND CLAIMS AGENT
FOR THE DEBTOR IN POSSESSION**

**MOTION OF DEBTOR FOR ENTRY OF AN ORDER
(I) ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION AND
REIMBURSEMENT OF EXPENSES OF PROFESSIONALS ON A MONTHLY BASIS
AND (II) LIMITING SERVICE OF NOTICES
OF HEARINGS ON INTERIM APPLICATIONS FOR COMPENSATION**

MOTION OF DEBTOR FOR AN ORDER (A) GRANTING AUTHORITY TO PAY PREPETITION TRUST FUND TAXES AND (B) AUTHORIZING AND DIRECTING FINANCIAL INSTITUTIONS TO HONOR AND PROCESS CHECKS AND TRANSFERS RELATED TO SUCH RELIEF

MOTION OF DEBTOR FOR AN ORDER (I) GRANTING AUTHORITY TO (A) PAY PREPETITION EMPLOYEE WAGES, SALARIES, AND RELATED ITEMS, (B) REIMBURSE PREPETITION EMPLOYEE BUSINESS EXPENSES, (C) MAKE CERTAIN PAYMENTS FOR WHICH PAYROLL DEDUCTIONS WERE MADE, (D) MAKE PREPETITION CONTRIBUTIONS AND PAY PREPETITION BENEFITS UNDER EMPLOYEE BENEFIT PLANS, AND (E) PAY ALL COSTS AND EXPENSES INCIDENT THERETO PURSUANT TO SECTION 105 OF THE BANKRUPTCY CODE AND (II) AUTHORIZING AND DIRECTING FINANCIAL INSTITUTIONS TO HONOR AND PROCESS CHECKS AND TRANSFERS RELATED TO SUCH RELIEF

MOTION OF DEBTOR FOR AN ORDER (A) SCHEDULING EXPEDITED HEARINGS ON ALL FIRST DAY MOTIONS AND APPLICATIONS AND (B) APPROVING FORM AND MANNER OF NOTICE THEREOF

MOTION OF DEBTOR FOR AN ORDER CONFIRMING THE ADMINISTRATIVE EXPENSE PRIORITY STATUS OF DEBTOR'S UNDISPUTED OBLIGATIONS TO SUPPLIERS FOR THE POSTPETITION DELIVERY OF GOODS AND PROVISION OF SERVICES

CONSOLIDATED MEMORANDUM OF LAW IN SUPPORT OF THE MOTIONS OF DEBTOR FOR ORDERS AUTHORIZING IT TO PAY CERTAIN PREPETITION CLAIMS

MOTION OF THE DEBTORS FOR ENTRY OF INTERIM AND FINAL ORDERS AUTHORIZING: (A) THE DEBTORS' USE OF CASH COLLATERAL PURSUANT TO SECTION 363 OF THE BANKRUPTCY CODE; (B) AUTHORIZING DEBTORS TO OBTAIN SECURED POSTPETITION FINANCING PURSUANT TO SECTION 364 OF THE BANKRUPTCY CODE; AND (C) APPROVING AND AUTHORIZING DEBTORS TO ENTER INTO CERTAIN RELATED LOAN DOCUMENTS

MEMORANDUM IN SUPPORT OF MOTION OF THE DEBTORS FOR ENTRY OF INTERIM AND FINAL ORDERS (A) AUTHORIZING THE DEBTORS' USE OF CASH COLLATERAL PURSUANT TO SECTION 363 OF THE BANKRUPTCY CODE; (B) AUTHORIZING DEBTORS TO OBTAIN SECURED POSTPETITION FINANCING PURSUANT TO SECTION 364 OF THE BANKRUPTCY CODE; AND (C) APPROVING AND AUTHORIZING DEBTORS TO ENTER INTO RELATED LOAN DOCUMENTS

**DEBTORS' MOTION FOR ORDER DIRECTING
JOINT ADMINISTRATION OF CHAPTER 11 CASES**

Respectfully submitted,

/s/ Anthony J. DeGirolamo
Anthony J. DeGirolamo (0059265)
3930 Fulton Dr., Ste. 100B
Canton, Ohio 44718
Telephone: (330) 305-9700
Facsimile: (330) 305-9713
E-mail: ajdlaw@sbcglobal.net

PROPOSED COUNSEL FOR
THE DEBTORS AND
DEBTORS IN POSSESSION