

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

STANADYNE LLC, et al.,¹

Debtors.

Chapter 11

Case No. 23-10207 (JTD)

(Jointly Administered)

Hearing Date:

March 14, 2023 at 2:00 p.m. (ET)

Objection Deadline:

March 7, 2023 at 4:00 p.m. (ET)

**Ref. Docket Nos. 3, 4, 5, 6, 7, 8, 9, 35, 46,
47, 48, 49, 50, 51, 52, and 55.**

OMNIBUS NOTICE OF FIRST DAY MOTIONS AND FINAL HEARING THEREON

PLEASE TAKE NOTICE that, on February 16, 2023, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed, among others, the following first day motions with the United States Bankruptcy Court for the District of Delaware (the “Court”):²

1. *Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Taxes and Regulatory Fees in the Ordinary Course of Business and (II) Authorizing Banks and Financial Institutions to Honor and Process Checks and Transfers Related Thereto [D.I. 3]*
2. *Debtors’ Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105(a) and 366 (I) Prohibiting Utilities From Altering, Refusing, or Discontinuing Services on Account of Prepetition Invoices, (II) Deeming Utilities Adequately Assured of Future Performance, and (III) Establishing Procedures for Determining Adequate Assurance [D.I. 4]*
3. *Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Maintain Their Existing Cash Management System, Bank Accounts, and Business Forms, (B) Honor Certain Prepetition Obligations Related Thereto, and (C) Continue to Perform Ordinary Course Intercompany Transactions; (II) Granting Administrative*

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number are: Stanadyne LLC (0378); Pure Power Technologies, Inc. (5202); Stanadyne PPT Holdings, Inc. (2594); and Stanadyne PPT Group Holdings, Inc. (1734). The Debtors’ headquarters are located at 405 White Street, Jacksonville, North Carolina 28546.

² The Debtors filed certain motions and an application that were approved on a final basis at the First Day Hearing, which are not listed herein.



Expenses Status to Ordinary Course Postpetition Intercompany Claims; and (III) Granting Related Relief [D.I. 5]

4. *Debtors' Motion for an Order (I) Authorizing the Debtors to (A) Continue Their Workers' Compensation Programs and Their Liability, Property and Other Insurance Programs and (B) Pay Certain Obligations in Respect Thereof, and (II) Authorizing the Debtors Financial Institutions to Honor and Process Checks and Transfers Related to Such Obligations [D.I. 6]*
5. *Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Prepetition Claims of (A) Domestic Critical Vendors, (B) Shippers, Warehousemen, and Other Lienholders, and (C) Foreign Vendors; (II) Authorizing Banks to Honor and Process Related Checks and Electronic Transfers; and (III) Granting Related Relief [D.I. 7]*
6. *Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing Debtors to Pay (I) Prepetition Employee Obligations, (II) Prepetition Withholding Obligations, and (III) Postpetition Employee Obligations in the Ordinary Course, and (B) Authorizing Banks to Honor Related Transfers [D.I. 8]*
7. *Debtors' Motion for Authority to (I) Maintain and Administer Prepetition Customer Programs, and (II) Pay and Honor Related Prepetition Obligations [D. I. 9]*

PLEASE TAKE FURTHER NOTICE that on February 21, 2023, the Debtors also filed the *Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Lenders, and (III) Granting Related Relief [D.I. 35]* (collectively with the motions listed above, (the "First Day Motions").

PLEASE TAKE FURTHER NOTICE that a hearing to consider the First Day Motions and certain other pleadings was held on February 22, 2023 (the "First Day Hearing"), at which time the Court approved the First Day Motions on an interim basis. See Docket Nos. 46, 47, 48, 49, 50, 51, 52, and 55.

PLEASE TAKE FURTHER NOTICE that any responses or objections to final approval of the First Day Motions must be in writing, filed with the Clerk of the Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, and served upon the following parties on or before **March 7, 2023 at 4:00 p.m. (ET)** (the "Objection Deadline"): (i) proposed co-counsel to the Debtors, Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, Delaware 19801, Attn: Michael R. Nestor (mnestor@ycst.com), Andrew L. Magaziner (amagaziner@ycst.com) and Ashley E. Jacobs (ajacobs@ycst.com); (ii) proposed co-counsel to the Debtors, Hughes Hubbard & Reed LLP, One Battery Park Plaza New York, NY 10004, Attn: Kathryn A. Coleman (katie.coleman@hugheshubbard.com) and Christopher Gartman (chris.gartman@hugheshubbard.com); (iii) the Office of the United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Wilmington, Delaware, 19801, Attn: Jane M. Leamy (jane.leafy@usdoj.gov); and (iv) counsel for the prepetition secured lender, Pachulski Stang Ziehl & Jones LLP, 919 N. Market Street, 17th Floor P.O. Box 8705 Wilmington, DE 19801, Attn: Laura Davis Jones (ljones@pszjlaw.com) and Timothy P. Cairns (tcairns@pszjlaw.com), and KTBS Law LLP, 1801 Century Park East, 26th Floor Los Angeles, CA 90067, Attn: Michael L.

Tuchin (mtuchin@ktbslaw.com), David A. Fidler (dfidler@ktbslaw.com), and Nir Maoz (nmaoz@ktbslaw.com).

PLEASE TAKE FURTHER NOTICE THAT A HEARING ON FINAL APPROVAL OF THE FIRST DAY MOTIONS WILL BE HELD ON MARCH 14, 2023 AT 2:00 P.M. (ET) BEFORE THE HONORABLE JOHN T. DORSEY IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 5RD FLOOR, COURTROOM NO. 5, WILMINGTON, DELAWARE 19801.

PLEASE TAKE FURTHER NOTICE that copies of the First Day Motions, any of the related interim orders, and all other pleadings filed in these chapter 11 cases are available, free of charge, from the website of the Court-appointed claims agent, Kurtzman Carson Consultants at <https://www.kccllc.net/stanadyne>.

IF NO OBJECTIONS TO ANY OF THE FIRST DAY MOTIONS ARE TIMELY FILED, SERVED, AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE FINAL RELIEF REQUESTED IN CONNECTION WITH SUCH FIRST DAY MOTIONS WITHOUT FURTHER NOTICE OR HEARING.

[Signature page follows]

Dated: February 23, 2023
Wilmington, Delaware

YOUNG CONAWAY STARGATT &
TAYLOR, LLP

/s/ Ashley E. Jacobs

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