

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 (TMH)

(Jointly Administered)

**NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR HEARING ON APRIL 18, 2023 AT 2:00 P.M. (ET)**

PLEASE NOTE THE TIME OF THE HEARING HAS CHANGED FROM 3:00 P.M. (ET) TO 2:00 P.M. (ET). The hearing will be held on the 3rd Floor, Courtroom No. 7.

All hearings will take place in person other than status conferences, scheduling conferences, pretrial conferences, discovery hearings, fee hearings or first-day hearings, which will be conducted remotely (unless the Court directs otherwise). All participants at an in-person hearing are required to attend in person, except that remote participation at an in-person hearing is permitted for: (i) counsel for a party or a pro se litigant that files a responsive pleading and intends to make only a limited argument; (ii) a party or a representative of a party that has not submitted a pleading but is interested in observing the hearing; (iii) any party that is proceeding, in a claims allowance dispute, on a pro se basis; or (iv) extenuating circumstances that warrant remote participation as may be determined by the Court.

If you intend to appear via Zoom, you are required to register in advance. Please use the link below to register for the hearing. Please register no later than 4:00 p.m. (ET) on April 17, 2023.

Registration link:

https://debuscourts.zoomgov.com/meeting/register/vJItD0Guqj8oEgYlHrRdbbYnlbg_2KHiiKc

After registering your appearance by Zoom, you will receive a confirmation email containing information about joining the hearing. You must use your full name when registering and logging into Zoom or you will not be granted access to the hearing.

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.



RESOLVED MATTERS

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](#), 2/16/23]

Response Deadline: March 7, 2023 at 4:00 p.m. (ET) [Extended to March 24, 2023 at 4:00 p.m. (ET) for the Official Committee of Unsecured Creditors]

Responses Received: Informal comments from the Official Committee of Unsecured Creditors

Related Documents:

- A. Interim Order (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. 46](#), 2/22/23]
- B. Omnibus Notice of First Day Motions and Final Hearing [[D.I. 60](#), 2/23/23]
- C. Certification of Counsel [[D.I. 173](#), 4/13/23]
- D. Final Order [[D.I. 181](#), 4/14/23]

Status: The Order has been entered.

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](#), 2/16/23]

Response Deadline: March 7, 2023 at 4:00 p.m. (ET) [Extended to March 24, 2023 at 4:00 p.m. (ET) for the Official Committee of Unsecured Creditors]

Responses Received:

- A. Informal Responses:
 - i. The Official Committee of Unsecured Creditors
 - ii. Duke Energy
 - iii. Piedmont Natural Gas
- B. Objection of Dominion Energy South Carolina, Inc., The Connecticut Light & Power Company and Yankee Gas Services Company [[D.I. 77](#), 3/2/23]

Related Documents:

- C. Interim Order 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. 47](#), 2/22/23]

- D. Omnibus Notice of First Day Motions and Final Hearing [[D.I. 60](#), 2/23/23]
- E. Notice of Withdrawal of Objection of Dominion Energy South Carolina, Inc., The Connecticut Light & Power Company and Yankee Gas Services Company [[D.I. 118](#), 3/23/23]
- F. Certification of Counsel [[D.I. 174](#), 4/13/23]
- G. Final Order [[D.I. 182](#), 4/14/23]

Status: The Order has been entered.

- 3. 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](#), 2/16/23]

Response Deadline: March 7, 2023 at 4:00 p.m. (ET) [Extended to March 24, 2023 at 4:00 p.m. (ET) for the Official Committee of Unsecured Creditors]

Responses Received: Informal Comments from the Official Committee of Unsecured Creditors

Related Documents:

- A. Interim 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. 49](#), 2/22/23]
- B. Omnibus Notice of First Day Motions and Final Hearing [[D.I. 60](#), 2/23/23]
- C. Certification of Counsel [[D.I. 175](#), 4/13/23]
- D. Final Order [[D.I. 183](#), 4/14/23]

Status: The Order has been entered.

- 4. 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](#), 2/16/23]

Response Deadline: March 7, 2023 at 4:00 p.m. (ET) [Extended to April 4, 2023 at 4:00 p.m. (ET) for the Official Committee of Unsecured Creditors]

Responses Received: Informal comments from the Official Committee of Unsecured Creditors, and the Office of the United States Trustee

Related Documents:

- A. Interim Order (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. 50](#), 2/22/23]
- B. Omnibus Notice of First Day Motions and Final Hearing [[D.I. 60](#), 2/23/23]
- C. Certification of Counsel [[D.I. 179](#), 4/13/23]
- D. Final Order [[D.I. 186](#), 4/14/23]

Status: The Order has been entered.

- 5. 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](#), 2/16/23]

Response Deadline: March 7, 2023 at 4:00 p.m. (ET) [Extended to March 24, 2023 at 4:00 p.m. (ET) for the Official Committee of Unsecured Creditors]

Responses Received: Informal comments from the Official Committee of Unsecured Creditors

Related Documents:

- A. Interim Order (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. 51](#), 2/22/23]
- B. Omnibus Notice of First Day Motions and Final Hearing [[D.I. 60](#), 2/23/23]
- C. Certification of Counsel [[D.I. 177](#), 4/13/23]
- D. Final Order [[D.I. 184](#), 4/14/23]

Status: The Order has been entered.

- 6. Debtors' Motion for Authority to (I) Maintain and Administer Prepetition Customer Programs, and (II) Pay and Honor Related Prepetition Obligations [[D.I. 9](#), 2/16/23]

Response Deadline: March 7, 2023 at 4:00 p.m. (ET) [Extended to March 24, 2023 at 4:00 p.m. (ET) for the Official Committee of Unsecured Creditors]

Responses Received: Informal comments from the Official Committee of Unsecured Creditors

Related Documents:

- A. Interim Order Authorizing the Debtors to (I) Maintain and Administer Prepetition Customer Programs, and (II) Pay and Honor Related Prepetition Obligations [[D.I. 52](#), 2/22/23]
- B. Omnibus Notice of First Day Motions and Final Hearing [[D.I. 60](#), 2/23/23]
- C. Certification of Counsel [[D.I. 178](#), 4/13/23]
- D. Final Order [[D.I. 185](#), 4/14/23]

Status: The Order has been entered.

MATTER WITH CERTIFICATION

- 7. Debtors' Motion for Entry of an Order (I) Establishing Deadlines for Filing Proofs of Claim and (II) Approving the Form, Timing, and Manner of Notice Thereof [[D.I. 164](#), 4/4/23]

Response Deadline: April 11, 2023 at 4:00 a.m. (ET)

Responses Received:

- A. Informal comments from the Prepetition Secured Parties, and Pension Benefit Guaranty Corporation

Related Documents:

- B. Certification of Counsel [D.I. 172, 4/13/23]
- C. Revised Certification of Counsel [[D.I. 188](#), 4/14/23]

Status: A certification of counsel has been filed. The Order may be entered without further notice or hearing.

MATTERS GOING FORWARD

- 8. 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 Expenses Status to Ordinary Course Postpetition Intercompany Claims; and (III) Granting Related Relief [[D.I. 5](#), 2/16/23]

Response Deadline: March 7, 2023 at 4:00 p.m. (ET) [Extended to April 4, 2023 at 4:00 p.m. (ET) for the Official Committee of Unsecured Creditors]

Responses Received:

- A. Informal Responses:
 - i. Official Committee of Unsecured Creditors (“UCC”)
 - ii. Office of the United States Trustee
 - iii. Wells Fargo Bank
 - iv. Bank of America
 - v. Prepetition Secured Parties

Related Documents:

- B. Interim Order (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 Expenses Status to Ordinary Course Postpetition Intercompany Claims; and (III) Granting Related Relief [[D.I. 48](#), 2/22/23]
- C. Omnibus Notice of First Day Motions and Final Hearing [[D.I. 60](#), 2/23/23]

Status: The Debtors, UCC, and Prepetition Secured Parties are in ongoing discussions. This matter is going forward.

- 9. 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](#), 2/21/23]

Response Deadline: March 7, 2023 at 4:00 p.m. (ET) [Extended to March 15, 2023 at 4:00 p.m. (ET) for Encina Equipment Finance] [Extended to April 11, 2023 at 4:00 p.m. (ET) for the Official Committee of Unsecured Creditors]

Responses Received:

- A. Informal comments from the Official Committee of Unsecured Creditors, and Encina Equipment Finance SPV LLC
- B. Limited Objection and Reservation of Rights of Encina Equipment Finance SPV LLC to 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. 42](#), 2/22/23]
- C. Reservation of Rights of the Official Committee of Unsecured Creditors with Respect to the Debtors' Motion for Use of Cash Collateral [[D.I. 187](#), 4/14/23]

Related Documents:

- D. Interim Order (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Lenders, and (III) Granting Related Relief [[D.I. 55](#), 2/22/23]
- E. Omnibus Notice of First Day Motions and Final Hearing [[D.I. 60](#), 2/23/23]
- F. Second Interim Order (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Lenders, and (III) Granting Related Relief [[D.I. 106](#), 3/20/23]
- G. Third Interim Order (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Lenders, and (III) Granting Related Relief [[D.I. 160](#), 4/4/23]

Status: The Debtors, UCC, and Prepetition Secured Parties are in ongoing discussions. This matter is going forward.

- 10. Debtors' Application for Entry of an Order Authorizing Retention and Employment of Angle Advisors LLC as the Debtors' Investment Banker, Effective as of March 8, 2023 [[D.I. 97](#), 3/14/23]

Response Deadline: March 28, 2023 at 4:00 a.m. (ET) [Extended to April 14, 2023 for the Official Committee of Unsecured Creditors]

Responses Received:

- A. Informal Responses
 - i. Official Committee of Unsecured Creditors
 - ii. Office of the United States Trustee
 - iii. Prepetition Secured Parties

Status: The Debtors, UCC, and Prepetition Secured Parties are in ongoing discussions. A revised form of order will be submitted. This matter is going forward.

Dated: April 14, 2023
Wilmington, Delaware

YOUNG CONAWAY STARGATT
& TAYLOR, LLP

/s/ Ashley E. Jacobs

Michael R. Nestor (No. 3526)
Andrew L. Magaziner (No. 5426)
Ashley E. Jacobs (No. 5635)
1000 North King Street
Rodney Square
Wilmington, Delaware 19801-6108
Telephone: (302) 571-6600
Facsimile: (302) 571-1253
Email: mnestor@ycst.com
amagaziner@ycst.com
ajacobs@ycst.com

-and-

Kathryn A. Coleman
Christopher Gartman
HUGHES HUBBARD & REED LLP
One Battery Park Plaza
New York, NY 10004-1482
Telephone: (212) 837-6000
Facsimile: (212) 422-4726
Email: katie.coleman@hugheshubbard.com
chris.gartman@hugheshubbard.com

Counsel for the Debtors