

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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In re: : Chapter 11

:

VALERITAS HOLDINGS, INC., *et al.*,¹ : Case No. 20-10290 (LSS)

:

Debtors. : (Jointly Administered)

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**AMENDED² NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON MARCH 12, 2020 AT 2:00 P.M. (ET)³**

MATTERS BEING ADJOURNED:

1. Motion of the Debtors to Approve Settlement Agreement Among the Debtors, CRG Servicing LLC, as Control Agent for the Prepetition Lenders, and the Prepetition Lenders [D.I. 42; Filed 2/11/20].

Response Deadline: March 5, 2020 at 4:00 p.m. (ET). Extended for CRG and the Official Committee of Unsecured Creditors to March 6, 2020 at 11:59 p.m. (ET).

Related Documents: None.

Responses Received: None.

Status: This matter is being adjourned to the hearing on March 20, 2020. In advance of the hearing on this matter, the Debtors intend to file a supplement to this motion to include the global settlement reached among the Debtors, CRG Servicing LLC, and the Official Committee of Unsecured Creditors.

¹ The debtors in these chapter 11 cases, along with the last four digits of each debtor’s federal tax identification number, are: Valeritas Holdings, Inc. (8907); Valeritas, Inc. (1056); Valeritas Security Corporation (9654); Valeritas US, LLC (0007). The corporate headquarters and the mailing address for the debtors is 750 Route 202 South, Suite 600, Bridgewater, New Jersey 08807.

² **Amended items appear in bold.**

³ Any party participating telephonically must make arrangements through CourtCall by telephone (866-582-6878) or facsimile (866-533-2946).



MATTERS WITH CERTIFICATIONS OF COUNSEL (C.N.O./C.O.C.):

2. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors' Proposed Form of Adequate Assurance of Payment, (II) Establishing Procedures for Resolving Objections by Utility Companies, and (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service [D.I. 8; Filed 2/9/20].

Response Deadline: March 5, 2020 at 4:00 p.m. (ET).

Related Documents:

- A. Interim Order (I) Authorizing the Debtors' Proposed Form of Adequate Assurance of Payment, (II) Establishing Procedures for Resolving Objections by Utility Companies, and (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service [D.I. 53; Filed 2/12/20].
- B. Omnibus Notice of Entry of Interim Orders and Hearing on Final Relief [D.I. 70; Filed 2/14/20].
- C. Certification of Counsel Regarding Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors' Proposed Form of Adequate Assurance of Payment, (II) Establishing Procedures for Resolving Objections by Utility Companies, and (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service [D.I. 144; Filed 3/10/20].
- D. Final Order (I) Approving the Debtors' Proposed Form of Adequate Assurance of Payment, (II) Establishing Procedures for Resolving Objections by Utility Companies, and (III) Prohibiting Utility Companies From Altering, Refusing, or Discontinuing Service [D.I. 156; Filed 3/11/20].**

Responses Received: None.

Status: An order has been entered for this matter; therefore, no hearing is necessary.

3. Motion of the Debtors for Entry of Interim and Final Orders Authorizing the Debtors to (I) Continue Their Insurance Program, and (II) Pay Prepetition and Postpetition Obligations in Respect Thereof [D.I. 9; Filed 2/9/20].

Response Deadline: March 5, 2020 at 4:00 p.m. (ET).

Related Documents:

- A. Interim Order Authorizing the Debtors to (I) Continue Their Insurance Program, and (II) Pay Prepetition and Postpetition Obligations in Respect Thereof [D.I. 54; Filed 2/12/20].

- B. Omnibus Notice of Entry of Interim Orders and Hearing on Final Relief [D.I. 70; Filed 2/14/20].
- C. Certification of Counsel Regarding Motion of the Debtors for Entry of Interim and Final Orders Authorizing the Debtors to (I) Continue Their Insurance Program, and (II) Pay Prepetition and Postpetition Obligations in Respect Thereof [D.I. 145; Filed 3/10/20].
- D. Final Order Authorizing the Debtors to (I) Continue Their Insurance Program, and (II) Pay All Prepetition and Postpetition Obligations in Respect Thereof [D.I. 157; Filed 3/11/20].**

Responses Received: None.

Status: An order has been entered for this matter; therefore, no hearing is necessary.

- 4. Motion of the Debtors for Entry of an Order Authorizing the Debtors to Pay Certain Prepetition Taxes [D.I. 10; Filed 2/9/20].

Response Deadline: March 5, 2020 at 4:00 p.m. (ET).

Related Documents:

- A. Interim Order Authorizing the Debtors to Pay Certain Prepetition Taxes [D.I. 55; Filed 2/12/20].
- B. Omnibus Notice of Entry of Interim Orders and Hearing on Final Relief [D.I. 70; Filed 2/14/20].
- C. Certification of Counsel Regarding Motion of the Debtors for Entry of an Order Authorizing the Debtors to Pay Certain Prepetition Taxes [D.I. 146; Filed 3/10/20].
- D. Final Order Authorizing the Debtors to Pay Certain Prepetition Taxes [D.I. 155; Filed 3/11/20].**

Responses Received: None.

Status: An order has been entered for this matter; therefore, no hearing is necessary.

- 5. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Prepetition Claims of Shippers, Warehousemen, and Non-Merchandise Lien Claimants to Satisfy Customs Obligations; (II) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers; and (III) Granting Related Relief [D.I. 11; Filed 2/9/20].

Response Deadline: March 5, 2020 at 4:00 p.m. (ET).

Related Documents:

- A. Interim Order (I) Authorizing the Debtors to Pay Prepetition Claims of Shippers, Warehousemen, and Non-Merchandise Lien Claimants to Satisfy Customs Obligations; (II) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers; and (III) Granting Related Relief [D.I. 56; Filed 2/12/20].
- B. Omnibus Notice of Entry of Interim Orders and Hearing on Final Relief [D.I. 70; Filed 2/14/20].
- C. Certification of Counsel Regarding Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Prepetition Claims of Shippers, Warehousemen, and Non-Merchandise Lien Claimants to Satisfy Customs Obligations; (II) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers; and (III) Granting Related Relief [D.I. 147; Filed 3/10/20].
- D. Final Order (I) Authorizing the Debtors to Pay Prepetition Claims of Shippers, Warehousemen, and Non-Merchandise Lien Claimants and to Satisfy Customs Obligations; (II) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers; and (III) Granting Related Relief [D.I. 154; Filed 3/11/20].**

Responses Received: None.

Status: An order has been entered for this matter; therefore, no hearing is necessary.

- 6. Motion of the Debtors for Entry of Interim and Final Orders (I) Approving Continued Use of Current Cash Management System; (II) Authorizing the Debtors to Open and Close Bank Accounts; (III) Authorizing Banks to Honor Certain Transfers; (IV) Permitting the Continued Intercompany Transfers and Granting Administrative Expense Priority Status; (V) Suspending the Requirements of 11 U.S.C. § 345(b); and (VI) Granting Related Relief [D.I. 13; Filed 2/9/20].

Response Deadline: March 5, 2020 at 4:00 p.m. (ET).

Related Documents:

- A. Interim Order (I) Approving Continued Use of Current Cash Management System; (II) Authorizing the Debtors to Open and Close Bank Accounts; (III) Authorizing Banks to Honor Certain Transfers; (IV) Permitting the Continued Intercompany Transfers and Granting Administrative Expense Priority Status; (V) Suspending the Requirements of 11 U.S.C. § 345(b); and (VI) Granting Related Relief [D.I. 58; Filed 2/12/20].
- B. Omnibus Notice of Entry of Interim Orders and Hearing on Final Relief [D.I. 70; Filed 2/14/20].

- C. Certification of Counsel Regarding Motion of the Debtors for Entry of Interim and Final Orders (I) Approving Continued Use of Current Cash Management System; (II) Authorizing the Debtors to Open and Close Bank Accounts; (III) Authorizing Banks to Honor Certain Transfers; (IV) Permitting the Continued Intercompany Transfers and Granting Administrative Expense Priority Status; (V) Suspending the Requirements of 11 U.S.C. § 345(b); and (VI) Granting Related Relief [D.I. 148; Filed 3/10/20].
- D. Final Order (I) Approving Continued Use of Cash Management System; (II) Authorizing the Debtors to Open and Close Bank Accounts; (III) Authorizing Banks to Honor Certain Transfers; (IV) Permitting the Continued Intercompany Transfers and Granting Administrative Expense Priority Status; (V) Suspending the Requirements of 11 U.S.C. 345(b); and (VI) Granting Related Relief [D.I. 161; Filed 3/11/20].**

Responses Received: None

Status: An order has been entered for this matter; therefore, no hearing is necessary.

- 7. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay or Honor Prepetition Obligations to Certain Critical Vendors; (II) Authorizing and Directing Financial Institutions to Honor all Related Checks and Electronic Payment Requests; (III) Confirming the Application of Section 362 of the Bankruptcy Code to Such Critical Foreign Vendors; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [D.I. 15; Filed 2/9/20].

Response Deadline: March 5, 2020 at 4:00 p.m. (ET).

Related Documents:

- A. Interim Order (I) Authorizing the Debtors to Pay or Honor Prepetition Obligations to Certain Critical Vendors; (II) Authorizing and Directing Financial Institutions to Honor all Related Checks and Electronic Payment Requests; (III) Confirming the Application of Section 362 of the Bankruptcy Code to Such Critical Foreign Vendors; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [D.I. 60; Filed 2/12/20].
- B. Omnibus Notice of Entry of Interim Orders and Hearing on Final Relief [D.I. 70; Filed 2/14/20].
- C. Certification of Counsel Regarding Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay or Honor Prepetition Obligations to Certain Critical Vendors; (II) Authorizing and Directing Financial Institutions to Honor all Related Checks and Electronic Payment Requests; (III) Confirming the Application of Section 362 of the Bankruptcy Code to Such Critical Foreign Vendors; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [D.I. 149; Filed 3/10/20].

- D. Final Order (I) Authorizing the Debtors to Pay or Honor Prepetition Obligations to (A) Certain Critical Domestic Vendors and (B) Certain Critical Foreign Vendors; (II) Authorizing and Directing Financial Institutions to Honor All Related Checks and Electronic Payment Requests; (III) Confirming the Application of Section 362 of the Bankruptcy Code to Such Critical Foreign Vendors; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [D.I. 162; Filed 3/11/20].**

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

Status: An order has been entered for this matter; therefore, no hearing is necessary.

8. Motion of the Debtors for the Entry of an Order (I) Authorizing the Debtors to Implement Key Employee Incentive Plan and Key Employee Retention Plan and (II) Granting Related Relief [D.I. 37; Filed 2/11/20].

Response Deadline: March 5, 2020 at 4:00 p.m. (ET).

Related Documents:

- A. Declaration of Steven Fleming in Support of Debtors' Motion for the Entry of an Order Approving Key Employee Incentive Plan and Key Employee Retention Plan and Granting Related Relief [D.I. 38; Filed 2/11/20].
- B. Motion of the Debtors for Entry of an Order Authorizing the Debtors to Redact and File Under Seal Certain Information Contained in the Motion of the Debtors for Entry of an Order (I) Authorizing the Debtors to Implement Key Employee Incentive Plan and Key Employee Retention Plan and (II) Granting Related Relief [D.I. 39; Filed 2/11/20].
- C. [SEALED] Motion of the Debtors for the Entry of an Order (I) Authorizing the Debtors to Implement Key Employee Incentive Plan and Key Employee Retention Plan and (II) Granting Related Relief [D.I. 40; Filed 2/11/20].
- D. Notice of Filing Revised, Redacted KEIP and KERP and Supplemental Declaration in Support of KEIP and KERP [D.I. 131; Filed 3/9/20].
- E. Certification of Counsel Regarding Motion of the Debtors for the Entry of an Order (I) Authorizing the Debtors to Implement Key Employee Incentive Plan and Key Employee Retention Plan and (II) Granting Related Relief [D.I. 150; Filed 3/10/20].
- F. Order (I) Authorizing the Debtors to Implement Key Employee Incentive Plan and Key Employee Retention Plan and (II) Granting Related [D.I. 168; Filed 3/12/20].**

Responses Received: Informal comments from the Office of the United States Trustee.

Status: An order has been entered for this matter; therefore, no hearing is necessary.

9. Motion of the Debtors for Entry of an Order Authorizing the Debtors to Redact and File Under Seal Certain Information Contained in the Motion of the Debtors for Entry of an Order (I) Authorizing the Debtors to Implement Key Employee Incentive Plan and Key Employee Retention Plan and (II) Granting Related Relief [D.I. 39; Filed 2/11/20].

Response Deadline: March 5, 2020 at 4:00 p.m. (ET).

Related Documents:

- A. [SEALED] Motion of the Debtors for the Entry of an Order (I) Authorizing the Debtors to Implement Key Employee Incentive Plan and Key Employee Retention Plan and (II) Granting Related Relief [D.I. 40; Filed 2/11/20].
- B. Certification of Counsel Regarding Motion of the Debtors for Entry of an Order Authorizing the Debtors to Redact and File Under Seal Certain Information Contained in the Motion of the Debtors for Entry of an Order (I) Authorizing the Debtors to Implement Key Employee Incentive Plan and Key Employee Retention Plan and (II) Granting Related Relief [D.I. 151; Filed 3/10/20].
- C. **Order Authorizing the Debtors to Redact and File Under Seal Certain Information Contained in the Motion of the Debtors for Entry of an Order (I) Authorizing the Debtors to Implement Key Employee Incentive Plan and Key Employee Retention Plan and (II) Granting Related Relief [D.I. 164; Filed 3/11/20].**

Responses Received: Informal comments from the Office of the United States Trustee.

Status: An order has been entered for this matter; therefore, no hearing is necessary.

10. Motion of the Debtors for Entry of an Administrative Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [D.I. 74; Filed 2/20/20].

Response Deadline: March 5, 2020 at 4:00 p.m. (ET).

Related Documents:

- A. Omnibus Notice of Second Day Motions and Applications and Second Day Hearing [D.I. 84; Filed 2/21/20].
- B. Certification of Counsel Regarding Motion of the Debtors for Entry of an Administrative Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [D.I. 134; Filed 3/9/20].

C. Administrative Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [D.I. 158; Filed 3/11/20].

Responses Received: Informal comments from the DIP Lender.

Status: An order has been entered for this matter; therefore, no hearing is necessary.

11. Motion of the Debtors for the Entry of an Order (I) Extending the Time to File Schedules of Assets and Liabilities and Statements of Financial Affairs and (II) Granting Related Relief [D.I. 75; Filed 2/20/20].

Response Deadline: March 5, 2020 at 4:00 p.m. (ET).

Related Documents:

- A. Omnibus Notice of Second Day Motions and Applications and Second Day Hearing [D.I. 84; Filed 2/21/20].
- B. Certification of Counsel Regarding Motion of the Debtors for the Entry of an Order (I) Extending the Time to File Schedules of Assets and Liabilities and Statements of Financial Affairs and (II) Granting Related Relief [D.I. 135; Filed 3/9/20].
- C. **Order (I) Extending the Time to File Schedules of Assets and Liabilities and Statements of Financial Affairs and (II) Granting Related Relief [D.I. 159; Filed 3/11/20].**

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

Status: An order has been entered for this matter; therefore, no hearing is necessary.

12. Motion of the Debtors for Entry of an Order (I) Authorizing the Debtors to Retain, Employ, and Compensate Professionals Utilized in the Ordinary Course of Business and (II) Granting Related Relief [D.I. 76; Filed 2/20/20].

Response Deadline: March 5, 2020 at 4:00 p.m. (ET).

Related Documents:

- A. Omnibus Notice of Second Day Motions and Applications and Second Day Hearing [D.I. 84; Filed 2/21/20].
- B. Certification of Counsel Regarding Motion of the Debtors for Entry of an Order (I) Authorizing the Debtors to Retain, Employ, and Compensate Professionals Utilized in the Ordinary Course of Business and (II) Granting Related Relief [D.I. 136; Filed 3/9/20].

C. Order (I) Authorizing The Debtors to Retain, Employ, and Compensate Professionals Utilized in The Ordinary Course of Business and (II) Granting Related Relief [D.I. 160; Filed 3/11/20].

Responses Received: Informal comments from the Office of the United States Trustee and the DIP Lender.

Status: An order has been entered for this matter; therefore, no hearing is necessary.

13. Application of the Debtors for Entry of an Order Authorizing Retention and Appointment of Kurtzman Carson Consultants LLC as Administrative Advisor, Pursuant to 11 U.S.C. § 327(a), Effective *Nunc Pro Tunc* to the Petition Date [D.I. 77; Filed 2/20/20].

Response Deadline: March 5, 2020 at 4:00 p.m. (ET).

Related Documents:

- A. Omnibus Notice of Second Day Motions and Applications and Second Day Hearing [D.I. 84; Filed 2/21/20].
- B. Certificate of No Objection [D.I. 137; Filed 3/9/20].
- C. **Order Authorizing Employment and Retention of Kurtzman Carson Consultants LLC as Administrative Advisor Effective Nunc Pro Tunc to the Petition Date [D.I. 163; Filed 3/11/20].**

Responses Received: Informal comments from the Office of the United States Trustee and the DIP Lender.

Status: An order has been entered for this matter; therefore, no hearing is necessary.

14. Motion of the Debtors for Entry of an Order (I) Establishing Deadlines for Filing Proofs of Claim, Including Section 503(b)(9) Claims, (II) Establishing Deadlines for Filing Administrative Claim Requests for Administrative Claims Accrued Through April 3, 2020, (III) Approving the Form and Manner of Notice Thereof, and (IV) Granting Related Relief [D.I. 78; Filed 2/20/20].

Response Deadline: March 5, 2020 at 4:00 p.m. (ET).

Related Documents:

- A. Omnibus Notice of Second Day Motions and Applications and Second Day Hearing [D.I. 84; Filed 2/21/20].
- B. Certification of Counsel Regarding Motion of the Debtors for Entry of an Order (I) Establishing Deadlines for Filing Proofs of Claim, Including Section 503(b)(9) Claims, (II) Establishing Deadlines for Filing Administrative Claim Requests for

Administrative Claims Accrued Through April 3, 2020, (III) Approving the Form and Manner of Notice Thereof, and (IV) Granting Related Relief [D.I. 143; Filed 3/9/20].

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

Status: An order has been submitted under certification of counsel; however the Court has indicated it has questions, therefore this matter is going forward.

15. Motion of the Debtors for Entry of Order (I) Authorizing the Debtors to Continue Certain Customer Programs and to Honor Certain Obligations in Connection with Same, and (II) Granting Related Relief [D.I. 79; Filed 2/20/20].

Response Deadline: March 5, 2020 at 4:00 p.m. (ET).

Related Documents:

- A. Omnibus Notice of Second Day Motions and Applications and Second Day Hearing [D.I. 84; Filed 2/21/20].
- B. Certificate of No Objection Regarding Motion of the Debtors for Entry of Order (I) Authorizing the Debtors to Continue Certain Customer Programs and to Honor Certain Obligations in Connection with Same, and (II) Granting Related Relief [D.I. 138; Filed 3/9/20].
- C. **Order (I) Authorizing the Debtors to Continue Certain Customer Programs and Honor Certain Obligations in Connection with Same, and Granting Related Relief [D.I. 167; Filed 3/12/20].**

Responses Received: None.

Status: An order has been entered for this matter; therefore, no hearing is necessary.

16. Debtors' First Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Reject Certain Executory Contracts, and (II) Granting Certain Related Relief [D.I. 80; Filed 2/9/20].

Response Deadline: March 5, 2020 at 4:00 p.m. (ET).

Related Documents:

- A. Omnibus Notice of Second Day Motions and Applications and Second Day Hearing [D.I. 84; Filed 2/21/20].
- B. Notice of Filing of Amended Schedule 1 to the Debtors' First Omnibus Rejection Motion [D.I. 89; Filed 2/25/20].

- C. Certification of Counsel Regarding Debtors' First Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Reject Certain Executory Contracts, and (II) Granting Certain Related Relief [D.I. 139; Filed 3/9/20].
- D. First Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Reject Certain Executory Contracts, and (II) Granting Certain Related Relief [D.I. 171; Filed 3/12/20].**

Responses Received: Informal comments from the DIP Lender.

Status: An order has been entered for this matter; therefore, no hearing is necessary.

- 17. Application of the Debtors for Entry of an Order (I) Authorizing the Debtors to Retain and Employ PriceWaterhouseCoopers LLC as Restructuring Advisor to the Debtors *Nunc Pro Tunc* to the Petition Date, (II) Modifying Certain Requirements Under Local Rule 2016-2, and (III) Granting Related Relief [D.I. 81; Filed 2/9/20].

Response Deadline: March 5, 2020 at 4:00 p.m. (ET).

Related Documents:

- A. Omnibus Notice of Second Day Motions and Applications and Second Day Hearing [D.I. 84; Filed 2/21/20].
- B. Certification of Counsel Regarding Application of the Debtors for Entry of an Order (I) Authorizing the Debtors to Retain and Employ PriceWaterhouseCoopers LLC as Restructuring Advisor to the Debtors *Nunc Pro Tunc* to the Petition Date, (II) Modifying Certain Requirements Under Local Rule 2016-2, and (III) Granting Related Relief [D.I. 140; Filed 3/9/20].
- C. Order (I) Authorizing the Debtors to Retain and Employ Pricewaterhousecoopers LLP as Restructuring Advisor, Nunc Pro Tunc to the Petition Date, (II) Modifying Certain Requirements Under Local Rule 2016-2, and (III) Granting Related Relief [D.I. 170; Filed 3/12/20].**

Responses Received: Informal comments from the Office of the United States Trustee.

Status: An order has been entered for this matter; therefore, no hearing is necessary.

- 18. Application of the Debtors for Entry of an Order (I) Authorizing the Debtors to Retain and Employ Lincoln Partners Advisors LLC as Investment Banker, *Nunc Pro Tunc* to the Petition Date, (II) Modifying Certain Requirements Under Local Rule 2016-2, and (III) Granting Related Relief [D.I. 82; Filed 2/20/20].

Response Deadline: March 5, 2020 at 4:00 p.m. (ET).

Related Documents:

- A. Omnibus Notice of Second Day Motions and Applications and Second Day Hearing [D.I. 84; Filed 2/21/20].
- B. Certification of Counsel Regarding Application of the Debtors for Entry of an Order (I) Authorizing the Debtors to Retain and Employ Lincoln Partners Advisors LLC as Investment Banker, *Nunc Pro Tunc* to the Petition Date, (II) Modifying Certain Requirements Under Local Rule 2016-2, and (III) Granting Related Relief [D.I. 141; Filed 3/9/20].

Responses Received: Informal comments from the Office of the United States Trustee and the DIP Lender.

Status: An order has been submitted under certification of counsel; however the Court has indicated it has questions, therefore this matter is going forward.

- 19. Application of Debtors for Entry of an Order (I) Authorizing the Debtors to Retain and Employ DLA Piper LLP (US) as Counsel, *Nunc Pro Tunc* to the Petition Date, and (II) Granting Related Relief [D.I. 83; Filed 2/21/20].

Response Deadline: March 5, 2020 at 4:00 p.m. (ET).

Related Documents:

- A. Omnibus Notice of Second Day Motions and Applications and Second Day Hearing [D.I. 84; Filed 2/21/20].
- B. Certification of Counsel Regarding Application of Debtors for Entry of an Order (I) Authorizing the Debtors to Retain and Employ DLA Piper LLP (US) as Counsel, *Nunc Pro Tunc* to the Petition Date, and (II) Granting Related Relief [D.I. 142; Filed 3/9/20].
- C. **Order Granting Application of the Debtors for Entry of An Order (I) Authorizing the Debtors to Retain and Employ DLA Piper LLP (Us) As Counsel, Nunc Pro Tunc to the Petition Date, and (II) Granting Related Relief [D.I. 169; Filed 3/12/20].**

Responses Received: Informal comments from the Office of the United States Trustee.

Status: An order has been entered for this matter; therefore, no hearing is necessary.

MATTERS GOING FORWARD:

20. Motion of the Debtors for Interim and Final Orders (I) Authorizing the Debtors to Pay Prepetition Wages and Compensation, (II) Authorizing the Continuation of Employee Benefit Programs, (III) Authorizing Banks to Honor and Process Checks and Transfers Related to Such Employee Obligations, and (IV) Granting Related Relief [D.I. 14; Filed 2/9/20].

Response Deadline: March 5, 2020 at 4:00 p.m. (ET). Extended for the DIP Lender.

Related Documents:

- A. Interim Order (I) Authorizing the Debtors to Pay Prepetition Wages and Compensation, (II) Authorizing the Continuation of Employee Benefit Programs, (III) Authorizing Banks to Honor and Process Checks and Transfers Related to Such Employee Obligations, and (IV) Granting Related Relief [D.I. 59; Filed 2/12/20].
- B. Omnibus Notice of Entry of Interim Orders and Hearing on Final Relief [D.I. 70; Filed 2/14/20].
- C. **Certification of Counsel Regarding Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Prepetition Wages and Compensation, (II) Authorizing the Continuation of Employee Benefit Programs, (III) Authorizing Banks to Honor and Process Checks and Transfers Related to Such Employee Obligations, and (IV) Granting Related Relief [D.I. 173; Filed 3/12/20].**

Responses Received: Informal comments from the DIP Lender and the Office of the United States Trustee. Question raised by the Office of the United States Trustee have been addressed.

Status: A certification of counsel has been filed for this matter; therefore no hearing is necessary unless the Court has any comments or questions.

21. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Senior Secured Superpriority Postpetition Financing; (II) Granting (A) Liens and Superpriority Administrative Expense Claims and (B) Adequate Protection to Certain Prepetition Lenders; (III) Authorizing Use of Cash Collateral; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing; and (VI) Granting Related Relief [D.I. 16; Filed 2/9/20].

Response Deadline: March 5, 2020 at 4:00 p.m. (ET).

Related Documents:

- A. Declaration of Brendan J. Murphy in Support of Debtors' Motion to Obtain Senior Secured Superpriority Financing and Related Relief [D.I. 17; Filed 2/10/20].

- B. Interim Order (I) Authorizing the Debtors to Obtain Senior Secured Superpriority Postpetition Financing; (II) Granting (A) Liens and Superpriority Administrative Expense Claims and (B) Adequate Protection to Certain Prepetition Lenders; (III) Authorizing Use of Cash Collateral; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing; and (VI) Granting Related Relief [D.I. 66; Filed 2/14/20].
- C. Omnibus Notice of Entry of Interim Orders and Hearing on Final Relief [D.I. 70; Filed 2/14/20].

Responses Received: Informal comments from the Office of the United States Trustee.

- A. Objection of the Official Committee of Unsecured Creditors to the Motion For Entry of Interim and Final Orders (I) Authorizing The Debtors To Obtain Senior Secured Superpriority Postpetition Financing; (II) Granting (A) Liens And Superpriority Administrative Expense Claims And (B) Adequate Protection To Certain Prepetition Secured Parties; (III) Authorizing Use Of Cash Collateral, As Such Term Is Defined In Section 363(a) Of The Bankruptcy Code; (IV) Modifying The Automatic Stay; (V) Scheduling A Final Hearing; And (VI) Granting Related Relief [D.I. 120; Filed 3/5/20].
- B. Reply of the Debtors to the Objection of the Official Committee of Unsecured Creditors to Postpetition Financing and Related Relief [D.I. 132; Filed 3/9/20].

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Status: This matter is going forward.

Dated: March 12, 2020
Wilmington, Delaware

Respectfully submitted,

DLA PIPER LLP (US)

/s/ Maris J. Kandestin

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-and-

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Counsel to the Debtors and Debtors in Possession