

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

KEYSTONE TUBE COMPANY, LLC,¹ *et al.*,
Debtors.

Chapter 11

Case No. 17-11330 (LSS)

(Jointly Administered)

AMENDED² NOTICE OF AGENDA FOR HEARING SCHEDULED ON JULY 7, 2017, AT 10:00 A.M. (PREVAILING EASTERN TIME), BEFORE THE LAURIE SELBER SILVERSTEIN AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, LOCATED AT 824 NORTH MARKET STREET, 6th FLOOR, COURTROOM NO. 2, WILMINGTON, DELAWARE 19801³

**PLEASE NOTE: ALL MATTERS ARE RESOLVED
AND THE HEARING HAS BEEN CANCELLED BY THE COURT.**

UNCONTESTED MATTERS FOR WHICH A COC HAS BEEN FILED:

1. Motion of Debtors Pursuant to Sections 105, 361, 362, 363, 503, and 507 of the Bankruptcy Code, Bankruptcy Rules 2002, 4001, and 9014 and Local Rules 2002-1(b), 4001-2, 9013-1(m) for Entry of Interim and Final Orders (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, and (IV) Scheduling a Final Hearing [Filed: 6/18/17] (Docket No. 14).

Response Deadline: June 30, 2017, at 4:00 p.m.

Responses Received: Informal comments from Bank of America, the DIP lender, and Ad Hoc Lender Committee.

Related Documents:

¹ The Debtors, together with the last four digits of each Debtor's tax identification number, are: Keystone Tube Company, LLC (8746); A.M. Castle & Co. (9160); HY-Alloy Steels Company (9160); Keystone Service, Inc. (9160); and Total Plastics, Inc. (3149). The location of the Debtors' headquarters and service address is 1420 Kensington Road, Suite 220, Oak Brook, IL 60523.

² **Amended items noted in bold.**

³ Any party who wishes to attend telephonically is required to make arrangements through CourtCall by telephone (866-582-6878) or by facsimile (866-533-2946).



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- a. [Signed] Interim Order (A) Authorizing the Debtors to Use Cash Collateral, (B) Granting Adequate Protection, (C) Modifying the Automatic Stay, and (D) Scheduling Final Hearing [Filed: 6/21/17] (Docket No. 71).
- b. Notice of Entry of Interim Order and Final Hearing Regarding Motion of Debtors Pursuant to Sections 105, 361, 362, 363, 503, and 507 of the Bankruptcy Code, Bankruptcy Rules 2002, 4001, and 9014 and Local Rules 2002-1(b), 4001-2, 9013-1(m) for Entry of Interim and Final Orders (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, and (IV) Scheduling a Final Hearing [Filed: 6/21/17] (Docket No. 88).
- c. Certification of Counsel Regarding Final Order (A) Authorizing the Debtors to Use Cash Collateral, (B) Granting Adequate Protection, (C) Modifying the Automatic Stay, and (D) Scheduling a Final Hearing [Filed: 7/5/17] (Docket No. 129).
- d. **[Signed] Final Order (A) Authorizing the Debtors to Use Cash Collateral, (B) Granting Adequate Protection, (C) Modifying the Automatic Stay, and (D) Scheduling a Final Hearing [Filed: 7/6/17] (Docket No. 137]**

Status: The order has been entered and this matter is resolved.

2. Motion of Debtors Pursuant to Sections 105, 361, 362, 363, 364, 503, and 507 of the Bankruptcy Code, Bankruptcy Rules 2002, 4001, and 9014 and Local Rules 2002-1(b), 4001-2, and 9013-1(m) for Entry of Final Order (I) Authorizing the Debtors to Incur Postpetition Debt and to Use Cash Collateral, (II) Granting Liens and Superpriority Claims in Favor of PNC Bank, National Association, (III) Modifying the Automatic Stay, and (IV) Granting Related Relief [Filed: 6/18/17] (Docket No. 21).

Response Deadline: June 30, 2017, at 4:00 p.m.

Responses Received:

- a. Informal comments from the United States Trustee
- b. Informal comments from Bank of America

Related Documents:

- a. [Proposed] Order (A) Authorizing the Debtors to: (A) Obtain Postpetition Revolving Loan Financing and (B) Use Cash Collateral; and (III) Granting Related Relief [Filed: 6/18/17] (Docket No. 21).
- b. Declaration of Joseph Kazanovski of Imperial Capital, LLC in Support of Motion of Debtors Pursuant to Sections 105, 361, 362, 363, 364, 503, and 507 of the

Bankruptcy Code, Bankruptcy Rules 2002, 4001, and 9014 and Local Rules 2002-1(b), 4001-2, and 9013-1(m) for Entry of Final Order (I) Authorizing the Debtors to Incur Postpetition Debt and to Use Cash Collateral, (II) Granting Liens and Superpriority Claims in Favor of PNC Bank, National Association, (III) Modifying the Automatic Stay, and (IV) Granting Related Relief [Filed: 6/18/17] (Docket No. 22).

- c. Notice of Hearing on Motion of Debtors Pursuant to Sections 105, 361, 362, 363, 364, 503, and 507 of the Bankruptcy Code, Bankruptcy Rules 2002, 4001, and 9014 and Local Rules 2002-1(b), 4001-2, and 9013-1(m) for Entry of Final Order (I) Authorizing the Debtors to Incur Postpetition Debt and to Use Cash Collateral, (II) Granting Liens and Superpriority Claims in Favor of PNC Bank, National Association, (III) Modifying the Automatic Stay, and (IV) Granting Related Relief [Filed: 6/21/17] (Docket No. 87).
- d. Certification of Counsel Regarding Motion of Debtors Pursuant to Sections 105, 361, 362, 363, 364, 503, and 507 of the Bankruptcy Code, Bankruptcy Rules 2002, 4001, and 9014 and Local Rules 2002-1(b), 4001-2, and 9013-1(m) for Entry of Final Order (I) Authorizing the Debtors to Incur Postpetition Debt and to Use Cash Collateral, (II) Granting Liens and Superpriority Claims in Favor of PNC Bank, National Association, (III) Modifying the Automatic Stay, and (IV) Granting Related Relief [Filed: 7/5/17] (Docket No. 127).
- e. **[Signed] Order (I) Authorizing Debtors to : (A) Obtain Post Petition Revolving Loan Financing and (B) Use Cash Collateral; and (II) Granting Related Relief [Filed: 7/6/17] (Docket No. 136)**

Status: **The order has been entered and this matter is resolved.**

- 3. Motion of Debtors for Entry of an Order Authorizing the Debtors to (I) Assume the Exit Facility Commitment Letter, (II) Pay and Reimburse Related Fees and Expenses, and (III) Indemnify the Parties Thereto [Filed: 6/18/17] (Docket No. 24).

Response Deadline: June 30, 2017, at 4:00 p.m.

Responses Received:

- a. Informal comments received by the United States Trustee

Related Documents:

- a. [Proposed] Order Authorizing the Debtors to (I) Assume the Exit Facility Commitment Letter, (II) Pay and Reimburse Related Fees and Expenses, and (III) Indemnify the Parties Thereto [Filed: 6/18/17] (Docket No. 24).

- b. [Signed] Order Fixing Hearing Date and Shortening Time Regarding Motion of Debtors for Entry of an Order Authorizing the Debtors to (I) Assume the Exit Facility Commitment Letter, (II) Pay and Reimburse Related Fees and Expenses, and (III) Indemnify the Parties Thereto [Filed: 6/20/17] (Docket No. 66).
- c. Notice of Hearing and Motion of Debtors for Entry of an Order Authorizing the Debtors to (I) Assume the Exit Facility Commitment Letter, (II) Pay and Reimburse Related Fees and Expenses, and (III) Indemnify the Parties Thereto [Filed: 6/21/17] (Docket No. 86).
- d. Certification of Counsel Regarding Revised Order Authorizing the Debtors to (I) Assume the Exit Facility Commitment Letter, (II) Pay and Reimburse Related Fees and Expenses, and (III) Indemnify the Parties Thereto [Filed: 7/5/17] (Docket No. 128).
- e. **[Signed] Order Authorizing the Debtors to (I) Ratify and Implement the Exit Facility Commitment Letter, (II) Pay and Reimburse Related Fees and Expenses, and (III) Indemnify the Parties Thereto [Filed 7/6/17] (Docket No. 139)**

Status: **The order has been entered and this matter is resolved.**

MATTER GOING FORWARD:

- 4. Amended Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing Payment of Prepetition Claims of General Unsecured Creditors and (II) Authorizing Applicable Banks and Other Financial Institutions to Honor and Process Related Checks and Transfers, and (III) Granting Related Relief [Filed: 6/29/17] (Docket No. 115).

[Proposed] Response Deadline: July 6, 2017, at 12:00 p.m.

Responses Received: None as of the date of this Notice of Agenda.

Related Documents:

- a. [Proposed] Amended Interim Order (I) Authorizing Payment of Prepetition Claims of General Unsecured Creditors and (II) Authorizing Applicable Banks and Other Financial Institutions to Honor and Process Related Checks and Transfers, and (III) Granting Related Relief [Filed: 6/29/17] (Docket No. 115, Exhibit B).
- b. Motion of Debtors for Order Fixing Hearing Date and Shortening Time Regarding Amended Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing Payment of Prepetition Claims of General Unsecured Creditors and (II) Authorizing Applicable Banks and Other Financial Institutions to Honor

and Process Related Checks and Transfers, and (III) Granting Related Relief [Filed: 6/29/17] (Docket No. 116).

- (i) [Signed] Order Fixing Hearing Date and Shortening Time Regarding Amended Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing Payment of Prepetition Claims of General Unsecured Creditors and (II) Authorizing Applicable Banks and Other Financial Institutions to Honor and Process Related Checks and Transfers, and (III) Granting Related Relief [Filed: 6/30/17] (Docket No. 118).
- c. Notice of Hearing Regarding Amended Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing Payment of Prepetition Claims of General Unsecured Creditors and (II) Authorizing Applicable Banks and Other Financial Institutions to Honor and Process Related Checks and Transfers, and (III) Granting Related Relief [Filed: 6/30/17] (Docket No. 119).
- d. **Certificate of No Objection Regarding Amended Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing Payment of Prepetition Claims of General Unsecured Creditors and (II) Authorizing Applicable Banks and Other Financial Institutions to Honor and Process Related Checks and Transfers, and (III) Granting Related Relief [Filed: 7/6/17] (Docket No. 135).**
- e. **[Signed] Amended Interim Order (I) Authorizing Payment of Prepetition Claims of General Unsecured Creditors and (II) Authorizing Applicable Banks and Other Financial Institutions to Honor and Process Related Checks and Transfers [Filed: 7/6/17] (Docket No. 138)**

Status: **The order has been entered and this matter is resolved.**

Dated: July 6, 2017

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Peter J. Keane

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Proposed Counsel for the Debtors
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