

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

*In re*

**PACE INDUSTRIES, LLC, *et al.*,<sup>1</sup>**

**Debtors.**

Chapter 11

Case No. 20-10927 (MFW)

(Joint Administration Requested)

**NOTICE OF AGENDA OF MATTERS SCHEDULED  
FOR TELEPHONIC HEARING ON APRIL 14, 2020 AT 10:30 A.M. (ET)**

**Date and Time of Hearing: APRIL 14, 2020 AT 10:30 A.M. (ET)**

**THE HEARING WILL BE HELD BEFORE THE HONORABLE MARY F. WALRATH AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 5TH FLOOR, COURTROOM 4, WILMINGTON, DELAWARE 19801. THE HEARING WILL BE CONDUCTED TELEPHONICALLY. ANY PERSON WHO WISHES TO APPEAR AT THE HEARING MUST CONTACT COURTCALL, LLC AT 866-582-6878. COURTCALL FEES ARE WAIVED FOR PRO SE INDIVIDUALS.**

**PETITIONS**

1. Voluntary Chapter 11 Petition Packages:
  - A. Pace Industries, LLC, Case No. 20-10927
  - B. KPI Holdings, LLC, Case No. 20-10928
  - C. KPI Capital Holdings, Inc., Case No. 20-10929
  - D. KPI Holdings, Inc., Case No. 20-10930
  - E. KPI Intermediate Holdings, Inc., Case No. 20-10931
  - F. Pace FQE, LLC, Case No. 20-10932
  - G. Pace Industries, Inc., Case No. 20-10933
  - H. Pace Industries of Mexico, L.L.C., Case No. 20-10934
  - I. Port City Group, Inc., Case No. 20-10935
  - J. Muskegon Castings, LLC, Case No. 20-10936
  - K. Alloy Resources, LLC, Case No. 20-10937

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: KPI Holdings, LLC (5032); KPI Capital Holdings, Inc. (6489); KPI Holdings, Inc. (6913); KPI Intermediate Holdings, Inc. (4492); Pace Industries, LLC (6490); Pace Industries, Inc. (6822); Pace FQE, LLC (3611); Port City Group, Inc. (6598); Muskegon Castings, LLC (6858); Alloy Resources, LLC (0283); and Pace Industries of Mexico, L.L.C. (5764). The Debtors' headquarters are located at 481 South Shiloh Drive, Fayetteville, Arkansas 72704.



**DECLARATION IN SUPPORT OF FIRST DAY PLEADINGS**

2. Declaration of Craig Potter in Support of First Day Relief [Docket No. 4, 4/12/20]

**MATTERS GOING FORWARD**

3. Debtors' Motion for Entry of an Order Pursuant to 11 U.S.C. § 105(a), Fed. R. Bankr. P. 1015(b) and Local Rule 1015-1 Directing Joint Administration of the Debtors' Related Chapter 11 Cases [Docket No. 3, 4/12/20]

Status: This matter will be going forward.

4. Application of Debtors for Authorization to Employ and Retain Kurtzman Carson Consultants LLC as Claims and Noticing Agent Effective as of the Petition Date [Docket No. 5, 4/12/20]

Status: This matter will be going forward.

5. Debtors' Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105(a) and 366(b): (I) Prohibiting Utilities from Altering, Refusing, or Discontinuing Services, (II) Deeming Utilities Adequately Assured of Future Performance, and (III) Establishing Procedures for Determining Adequate Assurance of Payment [Docket No. 6, 4/12/20]

Status: This matter will be going forward on an interim basis.

6. Debtors' Motion for an Order, Pursuant to Sections 105, 345, 363 and 503 of the Bankruptcy Code, Bankruptcy Rules 6003 and 6004, and Local Rule 2015-2: (A) Authorizing and Approving (I) Continued Use of Cash Management System and (II) Use of Prepetition Bank Accounts and Business Forms, (B) Authorizing Banks to Honor Certain Transfers and Charge Certain Amounts, (C) Modifying the Requirements of Section 345 on an Interim Basis, (D) Authorizing Continued Intercompany Transactions and (E) Granting Related Relief [Docket No. 7, 4/12/20]

Status: This matter will be going forward on an interim basis.

7. 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 [Docket No. 8, 4/12/20]

Status: This matter will be going forward on an interim basis.

8. 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 [Docket No. 9, 4/12/20]

Status: This matter will be going forward on an interim basis.

9. Debtors' Motion for Order Pursuant to Sections 105 and 363 of the Bankruptcy Code Authorizing the Debtors to Honor Prepetition Obligations Related to Customer Warranty Programs [Docket No. 13, 4/12/20]

Status: This matter will be going forward.

10. Debtors' Motion for Interim Order and Final Order Pursuant to Sections 105, 362 and 541 of the Bankruptcy Code and Bankruptcy Rule 3001 Establishing Notice and Hearing Procedures for Trading and Declarations of Worthlessness with Respect to Equity Securities in Debtors [Docket No. 15, 4/12/20]

Status: This matter will be going forward on an interim basis.

11. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay All Prepetition Trade and Other Impaired Claims in the Ordinary Course of Business, (II) Confirming Administrative Expense Priority of Undisputed and Outstanding Prepetition Orders, (III) Authorizing Financial Institutions to Honor and Process Checks and Transfers Related to Such Obligations, and (IV) Granting Related Relief [Docket No. 16, 4/12/20]

Status: This matter will be going forward on an interim basis.

12. Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing Debtors to Pay (I) Prepetition Employee Obligations and (II) Prepetition Withholding Obligations and (B) Authorizing Banks to Honor Related Transfers [Docket No. 17, 4/12/20]

Status: This matter will be going forward on an interim basis.

13. Debtors' Motion for Entry of an Order (A) Scheduling Combined Hearing to Consider (I) Approval of Disclosure Statement, (II) Approval of Solicitation Procedures and Forms of Ballots, and (III) Confirmation of Prepackaged Plan; (B) Establishing an Objection Deadline to Object to Disclosure Statement and Plan; (C) Approving the Form and Manner of Notice of Combined Hearing, Objection Deadline, and Notice of Commencement; (D) Approving Notice and Objection Procedures for the Assumption of Executory Contracts and Unexpired Leases; (E) Extending Time, and Upon Plan Confirmation, Waiving of Requirements to (I) Convene Section 341 Meeting, and (II) File Statements of Financial Affairs and Schedules of Assets and Liabilities; and (F) Granting Related Relief [Docket No. 20, 4/12/20]

Related Documents:

- A. Joint Prepackaged Chapter 11 Plan for Pace Industries, LLC and its Affiliated Debtors [Docket No. 18, 4/12/20]

B. Disclosure Statement for Joint Prepackaged Chapter 11 Plan for Pace Industries, LLC and its Affiliated Debtors [Docket No. 19, 4/12/20]

Status: This matter will be going forward.

14. Debtors' Motion for 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 [Docket No. 21, 4/13/20]

Related Document:

- A. Declaration of Jonathan Miller in Support of Debtors' Motion for 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 [Exhibit B to Docket No. 21, 4/13/20]

Status: This matter will be going forward on an interim basis.

Dated: April 13, 2020  
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Joseph M. Mulvihill

Robert S. Brady (No. 2847)  
Edmon L. Morton (No. 3856)  
Joseph M. Mulvihill (No. 6061)  
Rodney Square, 1000 North King Street  
Wilmington, Delaware 19801  
Telephone: (302) 571-6600  
Facsimile: (302) 571-1253  
rbrady@ycst.com  
emorton@ycst.com  
jmulvihill@ycst.com

-and-

WILLKIE FARR & GALLAGHER LLP  
Matthew A. Feldman (admitted *pro hac vice*)  
Rachel C. Strickland (admitted *pro hac vice*)  
Debra M. Sinclair (admitted *pro hac vice*)  
787 Seventh Avenue  
New York, New York 10019  
Telephone: (212) 728-8000  
Facsimile: (212) 728-8111  
mfeldman@willkie.com  
rstrickland@willkie.com  
dsinclair@willkie.com

*Proposed Counsel to the Debtors and Debtors in Possession*