

Motion for an Order Further Extending 90-Day Period Within Which the Debtors May Remove Civil Actions Under 28 U.S.C. § 1452 and Bankruptcy Rule 9027(a) (the “Removal Motion”).

By the Removal Motion, the Debtors seek entry of an order further extending their time to file notices of removal (the “Notices of Removal”)¹ of the numerous civil state and federal court actions or proceedings (collectively, the “Court Actions”) pending as of January 29, 2008 (the “Petition Date”) in which the Debtors are parties. As the Committee may recall, the Bankruptcy Court previously granted the Debtors two extensions of the time to file Notices of Removal, extending the current deadline to October 25, 2008. Accordingly, the Debtors seek entry of an order further extending the time to file Notices of Removal through and including January 23, 2008.

According to the Removal Motion, the Debtors and their management are continuing the process of determining whether removal is appropriate with respect to the Court Actions. The Debtors assert that these Court Actions are often managed at the division level and the analysis related to removal actions involves coordination with separate local counsel who represented the Debtors prior to the Petition Date. The Debtors argue that this analysis requires the time and attention of key employees who are currently focused other aspects of the Debtors’ chapter 11 cases. Therefore, the Debtors request additional time to file Notices of Removal with respect to the Court Actions.

A hearing on the Removal Motion has been scheduled for October 23, 2008, with an objection deadline of October 17, 2008 at 5:00 p.m. (ET).

¹ Notices of Removal effectuate a change of jurisdiction from the court where the Court Actions are currently pending to the district court in such jurisdiction.