

Emergency Motion for Entry of an Order Enforcing the Protections of Section 525(a) of the Bankruptcy Code (the “Anti-Discrimination Motion”).

By the Anti-Discrimination Motion, the Debtors request entry of an order enforcing section 525(a) of the Bankruptcy Code, which prohibits governmental discrimination against entities that have filed bankruptcy petitions. The Debtors’ businesses are heavily regulated and, thus, the Debtors are concerned that certain governmental or quasi-governmental entities will be dissuaded from issuing licenses, permits or bonds to the Debtors during the cases. While the order does not extend any protections not already offered by the Bankruptcy Code, the Debtors believe that such an order would clarify section 525(a) for any government authorities with which the Debtors interact and protect the Debtors from any discrimination that might result from misunderstandings.

An order enforcing the protections of section 525(a) of the Bankruptcy Code was entered on February 1, 2008.