

Emergency Motion for Entry of an Order Establishing Certain Notice, Case Management and Administrative Procedures (the “Case Procedures Motion”).

By the Case Procedures Motion, the Debtors seek entry of an order scheduling regular omnibus hearing dates at which all matters will be heard. Specifically, the Debtors request that the Bankruptcy Court schedule the dates and times for the first three omnibus hearing dates. Two days prior to each omnibus hearing date, the Debtors will file an agenda providing, among other information, matters to be addressed and a proposed schedule for addressing those matters. The Debtors believe that such relief will minimize the costs and expenses associated with the otherwise numerous and potentially irregularly-scheduled hearing dates.

Additionally, pursuant to the Case Procedures Motion, the Debtors request that every filing and adversary pleading be electronically filed on the Bankruptcy Court’s Electronic Filing System, except for documents which may be filed under seal. The Debtors further request that each party who files a notice of appearance and a request for service of papers (a “Notice Request”) will be deemed to have consented to electronic service (in lieu of any other type of notice) of filings, except any party who, in its Notice Request, expressly asks to be exempt from electronic service.

The Debtors further propose that, except as otherwise provided by the Bankruptcy Code or the Bankruptcy Rules, for a filing to be heard at the next-scheduled omnibus hearing date, a movant or applicant must file with the Bankruptcy Court and serve such filing at least 15 days prior to the next-scheduled omnibus hearing date (the “Filing Deadline”). If such Filing Deadline is not met, the filing will be heard at the next scheduled omnibus hearing date thereafter.

The Debtors further propose that, in the event a party cannot comply with the Filing Deadline, such party be permitted to shorten the Filing Deadline and have a filing heard on the next omnibus hearing date if, and only if, for cause shown, the Bankruptcy Court shortens such deadline.

An order approving the Case Procedures Motion was entered on January 31, 2008. An order approving amended case management procedures was entered on March 25, 2008.