

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

IN RE: _____ :
 : CHAPTER: 11
 : CASE NO.: _____
 : JUDGE: _____
 DEBTOR. :

**AMENDED APPLICATION FOR EXPEDITED CONSIDERATION
OF FIRST DAY MATTERS**

On _____, _____ filed a
petition for relief under Chapter 11 of the Bankruptcy Code.

Counsel for the Debtor requests that the following relief be provided on a first day basis
(check those that apply):

1. _____ MOTION SEEKING THE JOINT ADMINISTRATION OF MULTIPLE DEBTOR BANKRUPTCY CASES.
2. _____ MOTION FOR AN ORDER AUTHORIZING THE DEBTOR AN EXTENSION OF TIME WITHIN WHICH TO FILE STATEMENTS AND SCHEDULES.
3. _____ MOTION FOR AN ORDER AUTHORIZING THE EMERGENCY OR INTERIM USE OF CASH COLLATERAL OR DEBTOR-IN-POSSESSION FINANCING PENDING THE NOTICING AND SCHEDULING OF AN INTERIM OR FINAL HEARING FOR FINANCING PURSUANT TO BANKRUPTCY CODE §§ 363 AND 364 AND FED. R. BANKR. P. 4001.
4. _____ MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO MAINTAIN EXISTING BANK ACCOUNTS AND BUSINESS FORMS AND CASH MANAGEMENT PROCEDURES PROVIDING THE UNITED STATES TRUSTEE’S OFFICE WITH A 60 DAY PERIOD TO OBJECT TO SAID ORDER BEFORE IT BECOMES A FINAL ORDER.
5. _____ MOTION FOR AN ORDER AUTHORIZING A DEBTOR TO MODIFY THE INVESTMENT GUIDELINES SET FORTH IN BANKRUPTCY CODE § 345 ON AN INTERIM BASIS, PROVIDING THE UNITED STATES TRUSTEE’S OFFICE AND ANY OTHER PARTIES-IN-INTEREST A 60-DAY PERIOD TO OBJECT TO SAID ORDER BEFORE IT BECOME A FINAL ORDER.

6. _____ MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO PAY PRE-PETITION WAGES, SALARIES, COMPENSATION, EMPLOYEE BENEFITS AND REIMBURSABLE BUSINESS EXPENSES UP TO THE LIMITS SET FORTH IN BANKRUPTCY CODE § 507(a).
7. _____ MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO PAY PRE-PETITION SALES, USE, PAYROLL AND OTHER TAXES THAT ARE OTHERWISE PRIORITY CLAIMS UNDER BANKRUPTCY CODE § 507.
8. _____ MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO CONTINUE CREDIT CARD FACILITIES.
9. _____ MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO HONOR CERTAIN PRE-PETITION CUSTOMER OBLIGATIONS, DEPOSITS, REBATES, ETC.
10. _____ MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO CONTINUE WITH AND PAY PRE-PETITION OUTSTANDING AMOUNTS DUE ON VARIOUS INSURANCE POLICIES.
11. _____ MOTION FOR AN ORDER AUTHORIZING PAYMENT OF OUTSTANDING AND UNPAID PRE-PETITION DEBT TO CERTAIN VENDORS WHO PROVIDE CRITICAL AND NECESSARY SERVICES AND/OR PRODUCTS TO THE DEBTOR.
12. _____ MOTION FOR AN ORDER PURSUANT TO BANKRUPTCY CODE § 366 REGARDING ADEQUATE ASSURANCE FOR THE FUTURE PERFORMANCE FOR UTILITIES AND ESTABLISHING PROCEDURES FOR DETERMINING REQUESTS FOR ADDITIONAL ADEQUATE ASSURANCE.
13. _____ MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO RETAIN A CLAIMS AND NOTICING AGENT.
14. _____ MOTION FOR AN ORDER ESTABLISHING NOTICING PROCEDURES.

15. _____ OTHERS [COUNSEL SHOULD ADD ALL OTHER MOTIONS FOR WHICH IT SEEKS CONSIDERATION AS A FIRST DAY MATTER.]

_____, 20____

Name

Address

Telephone and Fax numbers

E-mail Address

NOTE: Each motion or application for which expedited consideration is requested shall be filed with the Clerk of the U.S. Bankruptcy Court For The District Of New Jersey and served upon the United States Trustee and all affected parties.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

In Re:

Case No.: _____

Chapter: 11

Hearing Date: _____

Judge: _____

**ORDER REGARDING APPLICATION FOR EXPEDITED
CONSIDERATION OF FIRST DAY MATTERS**

The relief set forth on the following pages, numbered two (2) through (4) is hereby ORDERED.

.....

This bankruptcy case was filed on _____, 20____. An Application For Expedited Consideration Of First Day Matters was filed. After review of the initial pleadings filed in this case which have been designated by counsel as requiring expedited consideration, and for good cause shown;

IT IS HEREBY ORDERED that the following motions are set down for hearing before the Honorable _____ in Courtroom # _____ located at _____ at the date and time as set forth below:

Hearing Date and Time

1. MOTION SEEKING THE JOINT ADMINISTRATION OF MULTIPLE DEBTOR BANKRUPTCY CASES. _____ at _____ .M.
2. MOTION FOR AN ORDER AUTHORIZING THE DEBTOR AN EXTENSION OF TIME WITHIN WHICH TO FILE STATEMENTS AND SCHEDULES. _____ at _____ .M.
3. MOTION FOR AN ORDER AUTHORIZING THE EMERGENCY USE OF CASH COLLATERAL OR DEBTOR-IN-POSSESSION FINANCING PENDING THE NOTICING AND SCHEDULING OF AN INTERIM HEARING FOR FINANCING PURSUANT TO BANKRUPTCY CODE §§ 363 AND 364 AND FED. R. BANKR. P. 4001. _____ at _____ .M.
4. MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO MAINTAIN EXISTING BANK ACCOUNTS AND BUSINESS FORMS AND } CASH MANAGEMENT PROCEDURES PROVIDING THE UNITED STATES TRUSTEE'S OFFICE WITH A 60 DAY PERIOD TO OBJECT TO SAID ORDER BEFORE IT BECOMES A FINAL ORDER. _____ at _____ .M.

5. MOTION FOR AN ORDER AUTHORIZING A DEBTOR TO MODIFY THE INVESTMENT GUIDELINES SET FORTH IN BANKRUPTCY CODE § 345 ON AN INTERIM BASIS, PROVIDING THE UNITED STATES TRUSTEE'S OFFICE AND ANY OTHER PARTIES-IN-INTEREST A 60-DAY PERIOD TO OBJECT TO SAID ORDER BEFORE IT BECOME A FINAL ORDER. _____ at _____ .M.
6. MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO PAY PRE-PETITION WAGES, SALARIES, COMPENSATION, EMPLOYEE BENEFITS AND REIMBURSABLE BUSINESS EXPENSES UP TO THE LIMITS SET FORTH IN BANKRUPTCY CODE § 507(a). _____ at _____ .M.
7. MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO PAY PRE-PETITION SALES, USE, PAYROLL AND OTHER TAXES THAT ARE OTHERWISE PRIORITY CLAIMS UNDER BANKRUPTCY CODE § 507. _____ at _____ .M.
8. MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO CONTINUE CREDIT CARD FACILITIES. _____ at _____ .M.
9. MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO HONOR CERTAIN PRE-PETITION CUSTOMER OBLIGATIONS, DEPOSITS, REBATES, ETC. _____ at _____ .M.
10. MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO CONTINUE WITH AND PAY PRE-PETITION OUTSTANDING AMOUNTS DUE ON VARIOUS INSURANCE POLICIES. _____ at _____ .M.
11. MOTION FOR AN ORDER AUTHORIZING PAYMENT OF OUTSTANDING AND UNPAID PRE-PETITION DEBT TO CERTAIN VENDORS WHO PROVIDE CRITICAL AND NECESSARY SERVICES AND/OR PRODUCTS TO THE DEBTOR. _____ at _____ .M.

12. MOTION FOR AN ORDER PURSUANT TO BANKRUPTCY CODE § 366 REGARDING ADEQUATE ASSURANCE FOR THE FUTURE PERFORMANCE FOR UTILITIES AND ESTABLISHING PROCEDURES FOR DETERMINING REQUESTS FOR ADDITIONAL ADEQUATE ASSURANCE. _____ at _____ .M.
13. MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO RETAIN A CLAIMS AND NOTICING AGENT. _____ at _____ .M.
14. MOTION FOR AN ORDER ESTABLISHING NOTICING PROCEDURES. _____ at _____ .M.
15. OTHERS [COUNSEL SHOULD ADD ALL OTHER MOTIONS FOR WHICH IT SEEKS CONSIDERATION AS FIRST DAY MATTERS AS SET FORTH IN THE UNDERLYING REQUEST.] _____ at _____ .M.

IT IS FURTHER ORDERED, that service of the within Order shall be made in accordance with the Court's General Order Adopting Guidelines Governing First Day Matters; and

IT IS FURTHER ORDERED, that objections and/or responses to First Day Matters, if any, shall be made in accordance with the Court's General Order Adopting Guidelines Governing First Day Matters.