

**APPENDIX CC11-3 – REQUEST FOR EMERGENCY CONSIDERATION OF CERTAIN
"FIRST DAY" MATTERS**

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
_____ DIVISION

IN RE:

DEBTOR.

§
§ CASE NO. _____
§
§

REQUEST FOR EMERGENCY CONSIDERATION
OF CERTAIN "FIRST DAY" MATTERS

On [date], [Debtor(s)] filed a petition for relief under Chapter 11 of the Bankruptcy Code. Proposed counsel for the debtor believes that the case qualifies as a "Complex Chapter 11 Case" and contemporaneously herewith, has filed a Notice of Designation as a Complex Chapter 11 Case. The debtor seeks emergency consideration of the following initial case matters (check those that apply*):

_____ JOINT MOTION FOR JOINT ADMINISTRATION

_____ MOTION FOR ORDER EXTENDING TIME TO FILE SCHEDULES AND
STATEMENT OF FINANCIAL AFFAIRS

_____ MOTION TO LIMIT OR MODIFY THE NOTICE REQUIREMENTS OF FED. R.
BANKR. P. 2002.

_____ MOTION TO PAY INSURANCE PREMIUMS.

_____ MOTION TO ESTABLISH BAR DATES AND FOR APPROVAL OF BAR DATE
NOTICES.

_____ MOTION TO ESTABLISH PRE-SET HEARING DATES.

_____ MOTION RE MAINTENANCE OF BANK ACCOUNTS AND EXISTING CASH
MANAGEMENT, ATTACHING NOTICE OF CONFERENCE WITH U.S. TRUSTEE

_____ MOTION TO PAY PRE-PETITION WAGES, SALARIES, ET AL., ATTACHING
NOTICE OF CONFERENCE WITH U.S. TRUSTEE AND DETAILED EXHIBIT
SHOWING WHO DEBTOR PROPOSES TO PAY AND AMOUNTS

_____ MOTION FOR ENTRY OF INTERIM ORDER AUTHORIZING USE OF CASH
COLLATERAL

_____ MOTION FOR INTERIM APPROVAL OF POST-PETITION SECURED AND SUPER
PRIORITY FINANCING PURSUANT TO SECTION 364(c) OF THE BANKRUPTCY
CODE

_____ MOTION PURSUANT TO 11 U.S.C. § 366, FOR ENTRY OF INTERIM ORDER (1)
DETERMINING ADEQUATE ASSURANCE OF PAYMENT FOR FUTURE UTILITY
SERVICES AND (2) RESTRAINING UTILITY COMPANIES FROM
DISCONTINUING, ALTERING, OR REFUSING SERVICE

_____ MOTION TO RETAIN A CLAIMS, BALLOTING, AND/OR NOTICING AGENT

_____ MOTION TO ESTABLISH INTERIM NOTICE PROCEDURES

_____ MOTION FOR ORDER APPROVING INTERIM RETENTION OF PROFESSIONALS

_____ MOTION FOR ORDER APPROVING PAYMENT OF PRE-PETITION CLAIMS OF
CERTAIN CRITICAL VENDORS

_____ MOTION TO PAY PRE-PETITION AND POST-PETITION TAXES

_____ MOTION TO PAY OIL & GAS ROYALTIES, MINERAL LIENS, MECHANIC OR
MATERIALMAN'S LIENS, JOINT INTEREST BILLING DISBURSEMENTS, OR
CLAIMS UNDER THE PERISHABLE AGRICULTURAL COMMODITIES ACT OF
1930, THE PACKERS AND STOCKYARDS ACT OF 1921, OR ANY STATE
STATUTES OF SIMILAR EFFECT.

_____ OTHERS (LIST):

_____, 20

[signature block of proposed counsel for the debtor]

* NOTE: The Court expects the parties to exercise judgment regarding which motions are applicable.