



*Debtors*)<sup>2</sup> together with Falcon Gas Storage Company, Inc., an affiliate of Arcapita which commenced a case under chapter 11 of the Bankruptcy Code on April 30, 2012 (the “*New Debtor*,” and collectively with the First Filed Debtors, the “*Debtors*”) submit this motion (the “*Motion*”) for entry of an order substantially in the form annexed hereto as *Exhibit A* pursuant to section 105(a) of the Bankruptcy Code directing that certain orders of the Court in the cases of the First Filed Debtors be made applicable to the New Debtor. In support thereof, the Debtors respectfully represent:

### **BACKGROUND**

1. On the March 19, 2012 (the “*First Filed Debtors’ Petition Date*”), each of the First Filed Debtors commenced cases under chapter 11 of the Bankruptcy Code. The First Filed Debtors are operating their businesses and managing their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.<sup>3</sup> No request has been made for the appointment of a trustee or an examiner in the First Filed Debtors’ chapter 11 cases. An official committee has been appointed by the Office of the United States Trustee in the First Filed Debtors’ cases.

2. The New Debtor commenced a chapter 11 case on April 30, 2012 (the “*New Debtor Petition Date*”). The New Debtor is operating as a debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No request has been made for the appointment of a trustee or an examiner in the New Debtor’s chapter 11 case. No official

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<sup>2</sup> The First Filed Debtors are: Arcapita Bank B.S.C.(c); Arcapita Investment Holdings Limited; Arcapita LT Holdings Limited; Windturbine Holdings Limited; AEID II Holdings Limited; and Railinvest Holdings Limited.

<sup>3</sup> A description of the First Filed Debtors’ business and the reasons for filing their chapter 11 cases is set forth in the Declaration of Henry A. Thompson in Support of the Debtors’ Chapter 11 Petitions and First Day Motions and in Accordance with Local Rule 1007-2 [Dkt. No. 6] (the “*Thompson Declaration*”).

committee has been appointed by the Office of the United States Trustee in the New Debtor's case.

3. The New Debtor is an indirect wholly owned subsidiary of Arcapita that previously owned the natural gas storage business NorTex Gas Storage Company, LLC (together with its subsidiaries, "**NorTex**"). In early 2010, Alinda Natural Gas Storage I, L.P. (n/k/a Tide Natural Gas Storage I, L.P.) ("**Tide I**"), Alinda Natural Gas Storage II, L.P. (n/k/a Tide Natural Gas Storage II, L.P.) ("**Tide II**," and together with Tide I, the "**Tide Entities**") acquired the stock of NorTex from the New Debtor for approximately \$515 million (subject to post-closing adjustments) pursuant to a Purchase Agreement, dated March 15, 2010, among the Tide Entities and the New Debtor, as amended. (the "**NorTex Purchase Agreement**"). Arcapita guaranteed certain of the New Debtor's obligations under the NorTex Purchase Agreement.

4. Prior to closing the NorTex Purchase Agreement, John Hopper and several other then-shareholders of the New Debtor filed actions against the New Debtor, certain of its directors, and NorTex seeking to enjoin the sale of NorTex to the Tide Entities (collectively, the "**Hopper Litigation**") based on the allegation that the New Debtor's board of directors had breached their fiduciary duties by agreeing to a sales price for NorTex below fair value.

5. As a result of the Hopper Litigation and as a condition to closing, the Tide Entities insisted that the New Debtor agree to place approximately \$70 million of the total sales proceeds from the NorTex sale in escrow which would be available to satisfy any indemnification obligations owed by the New Debtor to the Tide Entities resulting from the Hopper Litigation. After the NorTex sale closed, the New Debtor settled the Hopper Litigation in exchange for a cash payment of \$6.5 million at closing and also agreed that \$8.25 million of the escrowed sale proceeds received by the New Debtor from the Tide Entities would be turned

over to the plaintiffs in the Hopper Litigation once the funds were released from escrow. The closing of the Hopper Litigation settlement resulted in the occurrence of an “Escrow Breakage Event” under the terms of the Purchase Agreement and Escrow Agreement between the Tide Entities and the New Debtor and the funds held in escrow should have been released.

6. After the closing of the Hopper Litigation Settlement, and despite the satisfaction of all conditions set forth in the Purchase Agreement and Escrow Agreement between the Tide Entities and the New Debtor, including the occurrence of an “Escrow Breakage Event,” the Tide Entities refused to allow the release of funds from the Hopper Litigation escrow and instead filed an action in the Southern District of New York against the New Debtor, Arcapita, and Arcapita Inc., alleging breach of contract and “fraud in the inducement.” *Tide Natural Gas Storage I, L.P. v. Falcon Gas Storage Co., Inc.*, Case No. 10-cv-05821-KMW (S.D.N.Y.) (before Judge Kimba Wood) (the “*NorTex Litigation*”). The New Debtor’s primary asset consists of the escrow funds, which are the subject of claims by several parties, including the Tide Entities, the Hopper Litigation plaintiffs, and Arcapita. The New Debtor itself does not currently have any operations, employees or cash flow of its own, positive or negative.

7. As a result of the filing by the New Debtor, the Nor-Tex Litigation has been stayed as to the New Debtor and Arcapita and the funds held in Escrow are property of the New Debtor’s estate subject to the allowed claims of all creditors of the New Debtor, including Arcapita.

#### **JURISDICTION AND VENUE**

8. The Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

**RELIEF REQUESTED**

9. By this motion, the Debtors simply seek to have those generally applicable administrative orders previously entered in the First Filed Debtors' chapter 11 cases (the "***First Filed Debtors' Entered Orders***") applied to the New Debtor, effective *nunc pro tunc* to the New Debtor Petition Date. This Motion does not seek any disposition of the funds held in escrow pertaining to the Hopper Litigation. The Debtors also seek to have any additional generally applicable orders entered after the New Debtor Petition Date with respect to motions that were pending in the First Filed Debtors' jointly administered cases on or before the date hereof (the "***First Filed Debtors' Subsequent Orders***," and together with the First Filed Debtors' Entered Orders, the "***First Filed Debtors' Orders***") applied to the New Debtor, effective as of entry of any such orders, including without limitation the Order Directing Joint Administration of Related Chapter 11 Cases [Case No. 12-11076, Docket No. 16]. A chart showing the First Filed Debtors' Entered Orders and the motions seeking entry of the First Filed Debtors' Subsequent Orders is attached hereto as ***Exhibit B***.

10. The New Debtor reserves the right to supplement Exhibit B to the extent that the New Debtor identifies any additional orders predating the New Debtor Petition Date that should be made applicable to its case. The New Debtor will supplement the list by filing a notice with an amended Exhibit B attached thereto. The New Debtor requests that, absent an objection within ten (10) calendar days to any such notice, any newly identified orders be deemed applicable to the New Debtor, effective *nunc pro tunc* to the New Debtor Petition Date.

11. The Debtors seek this relief in an effort to eliminate the filing of duplicative applications and motions and, therefore, reduce the burdens on this Court and the parties in interest. To the extent that the relief requested herein is granted, each of the First Filed Debtors' Orders would apply to the New Debtor as if the New Debtor had commenced its

chapter 11 cases on the First Filed Debtors' Petition Date, with the limited exception that such orders will be effective as of the dates set forth above.

**BASIS FOR RELIEF REQUESTED**

12. The application of the First Filed Debtors' Orders to the New Debtor on the basis set forth herein is in the best interests of the Debtors' estates, creditors and other parties in interest. Similar relief has been granted by this district in other large chapter 11 cases. *See, e.g., In re Motors Liquidation Company*, Case No. 09-50026 (REG) (Bankr. S.D.N.Y. Oct. 16 2009) [Docket No. 4255]; *In re Lehman Brothers Holdings Inc.*, Case No. 08-13555 (JMP) (Bankr. S.D.N.Y. May 13, 2009) [Docket No. 3563]; *In re General Growth Properties, Inc.*, Case No. 09-11977 (ALG) (Bankr. S.D.N.Y. Apr. 23, 2009) [Docket No. 117]; and *In re Enron Corp.*, Case No. 01-16034 (AJG) (Bankr. S.D.N.Y. Jan. 11, 2002) [Docket No. 925].

13. Bankruptcy Code Section 105(a) provides that "[t]he court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title." 11 U.S.C. § 105(a). Pursuant to section 105(a) of the Bankruptcy Code, the Court has broad powers in equity to deliver any order or decree that is in the interest of preserving or protecting the value of a debtor's estate. *See, e.g., In re Chinichian*, 784 F.2d 1440, 1443 (9th Cir. 1986) ("Section 105 sets out the power of the bankruptcy court to fashion orders as necessary pursuant to the purposes of the Bankruptcy Code."); *Bird v. Crown Convenience (In re NWFx, Inc.)*, 864 F.2d 588, 590 (8th Cir. 1988) ("The overriding consideration in bankruptcy . . . is that equitable principles govern."); *In re Cooper Properties Liquidating Trust, Inc.*, 61 B.R. 531, 537 (Bankr. W.D. Tenn. 1986) ("The Bankruptcy Court is one of equity and as such it has a duty to protect whatever equities a debtor may have in property for the benefit of its creditors as long as that protection is implemented in a manner consistent with the bankruptcy laws.").

14. Entry of an order directing that the First Filed Debtors' Orders be made

applicable to the New Debtor will save the Debtors and parties in interest considerable time and expense by eliminating the need for duplicative notices, motions, applications, and orders to be filed in the New Debtor's chapter 11 case. If this Motion is not granted, the New Debtor would seek substantially the same substantive relief granted in the First Filed Debtors' Orders. Those orders provide the protections and authorizations that most debtors must seek in their chapter 11 cases, such as, among other things, joint administration, relief related to insurance and employee issues, and the retention and compensation of professionals. By proceeding in the manner of this Motion, the Debtors seek to reduce the burden on the Court for requesting relief, while at the same time providing the necessary facts and justification for such relief as if the New Debtor had filed such motions.

15. For the foregoing reasons, the application of First Filed Debtors' Orders to the New Debtor is in the best interests of the Debtors, their estates, their creditors, and parties in interest and should be approved.

#### **NOTICE**

16. The Debtors have provided notice of filing of the Motion by electronic mail, facsimile and/or overnight mail to: (i) each of the New Debtor's creditors; (ii) counsel to parties in active litigation with the New Debtor; (iii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21<sup>st</sup> Floor, New York, New York 10004 (Attn: Richard Morrissey, Esq.); (iv) the Official Committee of Unsecured Creditors of the First Filed Debtors, Milbank, Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, New York, New York 10005, Attn: Dennis F. Dunne, Esq. and Evan R. Fleck, Esq.; and (v) all parties listed on the Master Service List established in the First Filed Debtors' chapter 11 cases. A copy of the Motion is also available on the website of the First Filed Debtors' notice and claims agent, GCG, Inc., at [www.gcginc.com/cases/arcapita](http://www.gcginc.com/cases/arcapita).

**NO PRIOR REQUEST**

17. No prior motion for the relief sought in this Motion has been made to this  
or any other court.



WHEREFORE, the Debtors respectfully request that the Court grant the relief requested herein and such other and further relief as the Court may deem just and proper.

Dated: New York, New York  
May 10, 2012

Respectfully submitted,

/s/ Michael A. Rosenthal

Michael A. Rosenthal (MR-7006)

Janet M. Weiss (JW-5460)

Matthew K. Kelsey (MK-3137)

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**PROPOSED ATTORNEYS FOR THE DEBTORS  
AND DEBTORS IN POSSESSION**

**GIBSON, DUNN & CRUTCHER LLP**

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Proposed Attorneys for the Debtors  
 and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT  
 SOUTHERN DISTRICT OF NEW YORK**

-----X	:	
<b>IN RE:</b>	:	<b>Chapter 11</b>
	:	
<b>ARCAPITA BANK B.S.C.(c), et al.,</b>	:	<b>Case No. 12-11076 (SHL)</b>
	:	
<b>Debtors.</b>	:	<b>Jointly Administered</b>
	:	
-----X	:	
<b>IN RE:</b>	:	<b>Chapter 11</b>
	:	
<b>FALCON GAS STORAGE COMPANY, INC.,</b>	:	<b>Case No. 12-11790 (SHL)</b>
	:	
<b>Debtor.</b>	:	<b>Joint Administration Requested</b>
	:	
-----X	:	

**NOTICE OF (I) COMMENCEMENT OF CHAPTER 11 CASE OF FALCON GAS STORAGE COMPANY, INC.; AND (II) HEARING ON DEBTORS' MOTION FOR AN ORDER PURSUANT TO SECTION 105(a) OF THE BANKRUPTCY CODE DIRECTING THAT CERTAIN ORDERS IN THE CHAPTER 11 CASES OF ARCAPITA BANK B.S.C.(c), ET AL. BE MADE APPLICABLE TO SUBSEQUENT DEBTOR**

PLEASE TAKE NOTICE that on April 30, 2012 Falcon Gas Storage Company, Inc. (the "*New Debtor*") filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the "*Bankruptcy Code*") in the United States Bankruptcy Court for the Southern District of New York (the "*Bankruptcy Court*").

PLEASE TAKE FURTHER NOTICE that a hearing on the annexed motion, dated May 10, 2012 (the “*Motion*”) of Arcapita Bank B.S.C.(c) and certain of its subsidiaries and affiliates, as debtors and debtors in possession (collectively, the “*First Filed Debtors*”) and the New Debtor (collectively with the First Filed Debtors, the “*Debtors*”) will be held before the Honorable Sean H. Lane, United States Bankruptcy Judge, in Room 701 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York, 10004, on **May 31, 2012 at 2:00 p.m. (Eastern Time)**, or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion (the “*Objections*”) shall be filed electronically with the Court on the docket of *In re Arcapita Bank B.S.C.(c), et al.*, Ch. 11 Case No. 12-11076 (SHL) (the “*Docket*”), pursuant to the Case Management Procedures approved by this Court<sup>1</sup> and the Court's General Order M-399 (available at <http://nysb.uscourts.gov/orders/orders2.html>), by registered users of the Court's case filing system and by all other parties in interest on a 3.5 inch disk, preferably in portable document format (“*PDF*”), Microsoft Word, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and served in accordance with General Order M-399 on (i) proposed counsel for the Debtors, Gibson, Dunn & Crutcher LLP, 200 Park Avenue, New York, New York, 10166 (Attn: Michael A. Rosenthal, Esq., Janet M. Weiss, Esq. and Matthew K. Kelsey, Esq.); (ii) the Office of the United States

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<sup>1</sup> See Order (A) Waiving the Requirement That Each Debtor File a List of Creditors and Equity Security Holders and Authorizing Maintenance of Consolidated List of Creditors in Lieu of a Matrix; (B) Authorizing Filing of a Consolidated List of Top 50 Unsecured Creditors; and (C) Approving Case Management Procedures [Docket No. 21].

Trustee for the Southern District of New York, 33 Whitehall Street, 21<sup>st</sup> Floor, New York, New York 10004 (Attn: Richard Morrissey, Esq.); and (iii) the Official Committee of Unsecured Creditors of the First Filed Debtors, Milbank, Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, New York, New York 10005 (Attn: Dennis F. Dunne, Esq. and Evan R. Fleck, Esq.) and any other official committee appointed in these chapter 11 cases so as to be received no later than **May 24, 2012 at 12:00 p.m. (Eastern Time)** (the “*Objection Deadline*”).

PLEASE TAKE FURTHER NOTICE that if no Objections are timely filed and served with respect to the Motion, the Debtors may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Motion, which order may be entered with no further notice or opportunity to be heard.

Dated: New York, New York  
May 10, 2012

/s/ Michael A. Rosenthal  
Michael A. Rosenthal (MR-7006)  
Janet M. Weiss (JW-5460)  
Matthew K. Kelsey (MK-3137)  
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PROPOSED ATTORNEYS FOR THE DEBTORS  
AND DEBTORS IN POSSESSION

**EXHIBIT A**

**PROPOSED ORDER**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X	:	
<b>IN RE:</b>	:	<b>Chapter 11</b>
<b>ARCAPITA BANK B.S.C.(c), et al.,</b>	:	<b>Case No. 12-11076 (SHL)</b>
<b>Debtors.</b>	:	<b>Jointly Administered</b>
-----X	:	
<b>IN RE:</b>	:	<b>Chapter 11</b>
<b>FALCON GAS STORAGE COMPANY, INC.,</b>	:	<b>Case No. 12-11790 (SHL)</b>
<b>Debtor.</b>	:	<b>Joint Administration Requested</b>
-----X	:	

**ORDER PURSUANT TO SECTION 105(a) OF THE BANKRUPTCY CODE  
DIRECTING THAT CERTAIN ORDERS IN THE CHAPTER 11 CASES OF ARCAPITA  
BANK B.S.C.(c), ET AL. BE MADE APPLICABLE TO SUBSEQUENT DEBTOR**

Upon consideration of the motion (the “*Motion*”)<sup>1</sup> of Arcapita Bank B.S.C.(c) and certain of its subsidiaries, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “*First Filed Debtors*”) and Falcon Gas Storage Company, Inc., as debtor and debtor in possession in the above-captioned chapter 11 case (the “*New Debtor*,” and collectively with the First Filed Debtors, the “*Debtors*”) for entry of an order directing that orders entered in the chapter 11 cases of the First Filed Debtors be made applicable to the New Debtor, as more fully described in the Motion; and the Court having found that it has jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334; and the Court having found that

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<sup>1</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that the relief requested in the Motion is in the best interests of Debtors' estates, their creditors, and other parties in interest; and notice of the Motion and the opportunity for a hearing on the Motion was appropriate under the particular circumstances; and the Court having reviewed the Motion and having considered the statements in support of the relief requested therein at a hearing before the Court (the "**Hearing**"); and the Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED:**

1. The Motion is granted to the extent set forth herein.
2. Each of the First Filed Debtors' Entered Orders are applicable to the New Debtor effective *nunc pro tunc* to the date of commencement of the New Debtor's chapter 11 case (the "**New Debtor Petition Date**") and each of the First Filed Debtors' Subsequent Orders are applicable to the New Debtor effective as of entry of any such orders; *provided, however*, that to the extent that the New Debtor identifies any additional prior orders that should be made applicable to its case, the New Debtor shall file a notice with an amended Exhibit B attached thereto, and absent an objection within ten (10) calendar days to any such notice, such newly identified orders shall be deemed applicable to the New Debtor effective *nunc pro tunc* to the New Debtor Petition Date or the date of the entry of the order, whichever is later.
3. Any and all generally applicable orders hereafter entered in the First Filed Debtors' chapter 11 cases in respect of requests for relief pending before the Court on the date hereof shall be applicable to the New Debtor, effective as of the dates of entry of such orders in

the First Filed Debtors' chapter 11 cases, and as if the New Debtor was a Debtor as set forth in such orders.

4. This Court shall retain exclusive jurisdiction to enforce the terms of this Order.

Dated: New York, New York  
\_\_\_\_\_, 2012

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THE HONORABLE SEAN H. LANE  
UNITED STATES BANKRUPTCY JUDGE



## Exhibit B

### First Filed Debtors' Entered Orders

<b>Date</b>	<b>Docket #</b>	<b>Order</b>
3/22/2012	16	Order Directing Joint Administration of Related Chapter 11 Cases
3/22/2012	18	Order Extending the Time to File Schedules and Statements of Financial Affairs
3/22/2012	19	Order Confirming the Protections of Sections 362 and 365 of the Bankruptcy Code and Restraining Any Action In Contravention Thereof
3/22/2012	20	Order Granting the Debtors Additional Time to File Reports of Financial Information Pursuant to Federal Rule of Bankruptcy Procedure 2015.3(a)
3/22/2012	21	Order (a) Waiving the Requirement that Each Debtor File a List of Creditors and Equity Security Holders and Authorizing Maintenance of Consolidated List of Creditors In Lieu of a Matrix; (b) Authorizing Filing of a Consolidated List of Top 50 Unsecured Creditors; and (c) Approving Case Management Procedures
3/30/12	39	Interim Order Authorizing (a) Debtors to Pay Certain Prepetition Claims of Critical and Foreign Vendors; and (b) Financial Institutions to Honor and Process Related Checks and Transfers
3/30/12	40	Interim Order (a) Authorizing the Debtors to (a) Pay Certain Prepetition Wages, Salaries, and Reimbursable Employee Expenses, (b) Pay and Honor Employee Medical and Similar Benefits, and (c) Continue Employee Compensation and Employee Benefit Programs
3/30/12	43	Interim Order (a) Authorizing the Debtors to Continue Insurance Coverage Entered Into Prepetition and To Pay Obligations Relating Thereto; and (b) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers
4/12/12	67	Order Granting Motion for Admission Pro Hac Vice
4/19/12	83	Final Order Authorizing and Approving the Employment and Retention of GCG, Inc. as Administrative Agent for the Debtors and Debtors In Possession Nunc Pro Tunc to the Petition Date
4/19/12	84	Final Order Authorizing Retention and Appointment of GCG, Inc. as Claims and Noticing Agent under 28 U.S.C. § 156(c), 11 U.S.C. § 105(a), S.D.N.Y. LBR 5075-1 and General Order M-409 and Granting Related Relief
4/20/12	86	Third Interim Order (a) Authorizing Debtors to (i) Continue Use of Existing Cash Management System, Bank Accounts and Business Forms and (ii) Continue Ordinary Course Intercompany Transactions; and

<b>Date</b>	<b>Docket #</b>	<b>Order</b>
		(b) Granting an Extension of the Time to Comply with the Requirements of Section 345(b) of the Bankruptcy Code
4/24/12	94	Order Approving Specified Information Blocking Procedures and Permitting Trading in Claims against the Debtors Upon Establishment of a Screening Wall
4/30/12	105	<i>Ex Parte</i> Bridge Order Extending the Time to File Reports of Financial Information Pursuant To Federal Rule of Bankruptcy Procedure 2015.3(a) and Schedules and Statements of Financial Affairs

### **Motions Seeking First Filed Debtors' Subsequent Orders**

<b>Date</b>	<b>Docket #</b>	<b>Motion</b>
3/20/12	12	Debtors' Motion for Interim and Final Orders (a) Authorizing Debtors to (I) Continue Existing Cash Management System, Bank Accounts, and Business Forms and (ii) Continue Ordinary Course Intercompany Transactions; and (b) Granting an Extension of Time to Comply with the Requirements of Section 345(b) of the Bankruptcy Code
3/26/12	23	Debtors' Motion for Interim and Final Orders (A) Authorizing Debtors to Pay Certain Prepetition Claims of Critical and Foreign Vendors; and (B) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers
3/26/12	24	Debtors' Motion for Entry of Interim and Final Orders Authorizing the Debtors to (A) Pay Certain Prepetition Wages, Salaries, and Reimbursable Employee Expenses, (B) Pay and Honor Employee Medical and Similar Benefits, and (C) Continue Employee Compensation and Employee Benefit Programs
3/26/12	25	Debtors' Motion for Interim and Final Orders (A) Authorizing the Debtors to Continue Insurance Coverage Entered Into Prepetition and to Pay Obligations Relating Thereto; and (B) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers
4/2/12	46	Debtors' Application Pursuant to Sections 327(e) and 328 of the Bankruptcy Code for an Order Authorizing the Debtors to Retain and Employ Trowers & Hamlins LLP as Bahraini Counsel <i>Nunc Pro Tunc</i> to the Petition Date
4/2/12	47	Debtors' Application for Interim and Final Orders Approving the Employment and retention of Alvarez & Marsal North America, LLC as Financial Advisors to Debtors and Debtors In Possession Pursuant to Sections 327(a) and 328 of the Bankruptcy Code
4/2/12	48	Debtors' Motion for Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals

<b>Date</b>	<b>Docket #</b>	<b>Motion</b>
		and Committee Members
4/2/12	49	Debtors' Motion for an Order Pursuant to Sections 105(a), 327, 328 and 330 of the Bankruptcy Code Authorizing Debtors to Employ and Retain Certain Professionals Utilized in the Ordinary Course of the Debtors' Business
4/3/12	51	Debtors' Application for an Order Approving the Employment and Retention of Gibson, Dunn & Crutcher LLP as Counsel for the Debtors In Possession <i>Nunc Pro Tunc</i> to the Petition Date
4/3/12	52	Debtors' Motion for Order Authorizing Parties to File Under Seal Names of the Debtors' Customers
4/3/12	53	Debtors Application for an Order Approving the Employment and Retention of Rothschild Inc. And N M Rothschild & Sons Limited as Financial Advisors and Investment Bankers for the Debtors <i>Nunc Pro Tunc</i> to the Petition Date
4/23/12	90	Debtors' Motion for an Order Further Extending the Time to File Reports of Financial Information Pursuant to Federal Rule of Bankruptcy Procedure 2015.3(a)
4/23/12	91	Debtors' Motion for Entry of Order Further Extending the Time to File Schedules and Statements of Financial Affairs
4/23/12	92	Debtors' Application Pursuant to Sections 327(e), 328(a), and 330(a) of the Bankruptcy Code for an Order Authorizing the Debtors to Retain and Employ Linklaters LLP as Special Counsel to the Debtors <i>Nunc Pro Tunc</i> to the Petition Date
5/2/12	113	Debtors' Application for an Order Approving the Employment and Retention of KPMG LLP (US) as Tax Consultants to Debtors and Debtors In Possession Pursuant to Section 327(a) of the Bankruptcy Code
5/4/12	123	Debtors' Application Pursuant to Sections 327(a) and 330 of the Bankruptcy code for an Order Authorizing the Debtors to Retain and Employ KPMG LLP as Valuation Advisor to the Debtors <i>Nunc Pro Tunc</i> to the Petition Date