## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

BOOMERANG TUBE, LLC, a Delaware limited liability company, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 15-11247 (MFW)

Joint Administration Requested

# NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING ON JUNE 10, 2015 AT 12:00 NOON (ET)

#### I. PETITIONS AND RELATED FIRST DAY PLEADINGS

- 1. Voluntary Petition Packages
  - A. Boomerang Tube, LLC Case No. 15-11247
  - B. BTCSP, LLC Case No. 15-11248
  - C. BT Financing, Inc. Case No. 15-11249
- 2. Declaration of Kevin Nystrom, Chief Restructuring Officer, Interim Chief Executive Officer, and President of Boomerang Tube, LLC, in Support of Chapter 11 Petitions and First Day Pleadings [D.I. 2, 6/9/15]

#### II. FIRST DAY APPLICATIONS AND MOTIONS GOING FORWARD

- 3. Debtors' Motion for Entry of an Order Directing the Joint Administration of the Debtors' Chapter 11 Cases [D.I. 3, 6/9/15]
- 4. Debtors' Application for Entry of an Order, Pursuant to 28 U.S.C. § 156(c), (A) Approving the Retention and Appointment of Donlin, Recano & Company, Inc. as Claims and Noticing Agent for the Debtors, Effective *Nunc Pro Tunc* to the Petition Date and (B) Granting Related Relief [D.I. 4, 6/9/15]

The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Boomerang Tube, LLC (9415); BTCSP, LLC (7632); and BT Financing, Inc. (6671). The location of the Debtors' corporate headquarters is 14567 North Outer Forty, Suite 500, Chesterfield, Missouri 63017.

- 5. Debtors' Motion for Entry of an Order (A) Authorizing the Debtors to (I) Continue Using Their Existing Cash Management System, Including Bank Accounts, and Honor Related Prepetition Fees and Expenses, and (II) Maintain Their Existing Business Forms, (B) Authorizing Continued Intercompany Transfers Related to Payroll Funding, and (C) Granting a Waiver of the Investment and Deposit Requirements of Section 345(b) of the Bankruptcy Code [D.I. 5, 6/9/15]
- 6. Debtors' Motion for Entry of an Order (A) Authorizing the Debtors to Honor and Pay Prepetition Customer Obligations and (B) Granting Relief From the Automatic Stay to Continue Certain Customer Programs, and (C) Authorizing Financial Institutions to Honor and Process Checks and Transfers Related to Such Obligations [D.I. 6, 6/9/15]
- 7. Debtors' Motion for Entry of an Order (A) Authorizing the Debtors to Pay and Honor Certain Prepetition Wages, Benefits and Other Compensation Obligations and (B) Authorizing Financial Institutions to Honor and Process Checks and Transfers Related to Such Obligations [D.I. 7, 6/9/15]
- 8. Debtors' Motion for Entry of Interim and Final Orders (A) Prohibiting Utilities From Altering, Refusing or Discontinuing Service, (B) Deeming Utilities Adequately Assured of Future Performance and (C) Establishing Procedures for Determining Adequate Assurance of Payment [D.I. 8, 6/9/15]
- 9. Debtors' Motion for Entry of Order (A) Authorizing Debtors to (I) Continue Insurance Programs, (II) Pay All Obligations In Respect Thereof, and (III) Continue to Honor Insurance Premium Financing Obligations, and (B) Authorizing and Directing Banks and Financial Institutions to Honor and Process Checks and Transfers Related to Such Obligations [D.I. 9, 6/9/15]
- 10. Debtors' Motion for Entry of an Order (A) Authorizing Payment of Certain Prepetition Taxes and Fees and (B) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers [D.I. 10, 6/9/15]
- 11. Debtors' Motion for Entry of an Order (A) Authorizing the Debtors to Pay Certain Prepetition Claims of Critical Vendors, Shippers and Warehousemen and (B) Authorizing Financial Institutions to Honor All Related Checks and Electronic Payment Requests [D.I. 11, 6/9/15]
- 12. Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing Postpetition Financing Under Two Credit Facilities, (B) Granting Liens and Providing Superpriority Administrative Expense Claims, (C) Authorizing the Use of Cash Collateral, (D) Granting Adequate Protection, (E) Modifying the Automatic Stay, (F) Scheduling a Final Hearing, and (G) Granting Related Relief [D.I. 12, 6/9/15]

June 9, 2015 Dated:

/s/ Ryan M. Bartley Wilmington, Delaware

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Proposed Counsel for the Debtors and Debtors in Possession