

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

In re:

Gorham Paper and Tissue, LLC, *et al.*,

Debtors.¹

Chapter 11

Case No. 20-12814 (KBO)

(Joint Administration Requested)

**NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR HEARING ON NOVEMBER 6, 2020 AT 12:30 P.M. (ET)**

This hearing will be held telephonically via CourtCall and, in certain circumstances, by video via Zoom. **All** parties wishing to appear must do so telephonically by contacting CourtCall, LLC at 866-582-6878. Only those parties that will be addressing the Court should appear by video via Zoom in addition to their CourtCall registration.

**PLEASE NOTE THAT MICROPHONES ON THE ZOOM MEETING WILL BE
MUTED AND THE ONLY AUDIO WILL BE THROUGH COURTCALL.**

Topic: Gorham Paper and Tissue, LLC 20-12814-KBO
Time: November 6, 2020 12:30 PM Eastern Time (US and Canada)

Join ZoomGov Meeting
<https://debuscourts.zoomgov.com/j/1619603773>

Meeting ID: 161 960 3773
Passcode: 128317

VOLUNTARY PETITIONS

1. [Gorham Paper and Tissue, LLC](#)
2. [White Mountain Tissue, LLC](#)

FIRST DAY DECLARATION

3. Declaration of Richard Arnold in Support of Chapter 11 Petitions and First Day Pleadings [Docket No. [13](#); Filed: 11/4/2020]

¹ The last four digits of Gorham Paper and Tissue, LLC's federal taxpayer identification number are 6533. *See* 11 U.S.C. § 342(c)(1). The last four digits of White Mountain Tissue, LLC's federal taxpayer identification number are 0078. *See id.* The principal place of business for Gorham Paper and Tissue, LLC and White Mountain Tissue, LLC is 72 Cascade Flats, Gorham, New Hampshire, 03581.

MATTERS GOING FORWARD

4. Motion of Debtors for Entry of an Order Directing Joint Administration of Chapter 11 Cases [Docket No. [6](#); Filed: 11/4/2020]

Status: This matter will go forward.

5. Application of Debtors for Entry of an Order Authorizing the Debtors to Retain and Appoint Donlin, Recano & Company, Inc. as the Claims and Noticing Agent Effective as of to the Petition Date [Docket No. [7](#); Filed: 11/4/2020]

Status: This matter will go forward.

6. Motion of Debtors for Entry of an Order: (I) Authorizing Use of Cash Management Procedures, Bank Accounts, and Existing Business Forms; (II) Authorizing Bank of New Hampshire to Administer Bank Accounts; (III) Prohibiting Bank of New Hampshire From Setting Off Against the Bank Accounts; (IV) Modifying Requirements of Section 345(b) of the Bankruptcy Code; and (V) Authorizing Continued Intercompany Transfers Between Debtors [Docket No. [8](#); Filed: 11/4/2020]

Status: This matter will go forward on an interim basis.

7. Motion of Debtors for Entry of an Order Authorizing Debtors to (I) Maintain and Renew Existing Insurance Policies and Pay All Obligations Arising Therefrom; and (II) Continue Insurance Premium Financing Programs, Pay Insurance Premium Financing Obligations Arising Thereunder, and Renew or Enter Into New Premium Financing Agreements in the Ordinary Course [Docket No. [9](#); Filed: 11/4/2020]

Status: This matter will go forward.

8. Motion of Debtors for Entry of an Order on an Interim and Then Final Basis: (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services; (II) Prohibiting Utility Providers From Altering, Refusing, or Discontinuing Services; (III) Approving Procedures for Resolving Additional Adequate Assurance Requests; and (IV) Setting Final Hearing [Docket No. [10](#); Filed: 11/4/2020]

Status: The Debtors will seek an interim hearing on this matter on or before November 20, 2020, subject to the Court's availability.

9. Motion of Gorham Paper and Tissue, LLC for Entry of Interim and Final Orders Authorizing the Debtor to (A) Pay Prepetition Employee Compensation and Related Payroll and Benefit Obligations; (B) Continue Employee Benefit Programs in the Ordinary Course; (C) Maintain Employee Insurance Policies and Pay Related Premiums; and (D) Pay Prepetition Expenses Related to an Independent Contractor [Docket No. [11](#); Filed: 11/4/2020]

Status: This matter will go forward on an interim basis.

10. Motion of Debtors for Entry of Interim and Final Orders, Pursuant to 11 U.S.C. §§ 105, 361, 362, 363(c), 363(e), 364 and 507 and Fed. R. Bankr. P. 2002, 4001 and 9014: (I) Authorizing Debtors to Obtain Postpetition Financing Pursuant to § 364 of the Bankruptcy Code; (II) Authorizing Use of Cash Collateral Pursuant to § 363 of the Bankruptcy Code; (III) Granting Liens and Super-Priority Claims; (IV) Granting Adequate Protection to the Prepetition Secured Parties; and (V) Setting a Final Hearing Pursuant to Fed. R. Bankr. P. 4001(b) and (c) [Docket No. [12](#); Filed: 11/4/2020]

Status: This matter will go forward on an interim basis.

Dated: November 5, 2020
Wilmington, Delaware

Respectfully submitted,

POLSINELLI PC

/s/ Christopher A. Ward

Christopher A. Ward (Del. Bar No. 3877)
Shanti M. Katona (Del. Bar No. 5352)
222 Delaware Avenue, Suite 1101
Wilmington, Delaware 19801
Telephone: (302) 252-0920
Facsimile: (302) 252-0921
cward@polsinelli.com
skatona@polsinelli.com

-and-

**BERNSTEIN, SHUR, SAWYER & NELSON,
P.A.**

D. Sam Anderson (Admitted *Pro Hac Vice*)
Robert J. Keach (Admitted *Pro Hac Vice*)
Adam R. Prescott (Admitted *Pro Hac Vice*)
100 Middle Street
PO Box 9729
Portland, Maine 04104
Telephone: (207) 774-1200
Facsimile: (207) 774-1127
sanderson@bernsteinshur.com
rkeach@bernsteinshur.com
aprescott@bernsteinshur.com

*Proposed Counsel to the Debtors and Debtors in
Possession*