

**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 (I) FILING OF CHAPTER 11 BANKRUPTCY PETITIONS
AND FIRST DAY PLEADINGS, AND (II) SCHEDULING OF FIRST DAY HEARING**

PLEASE TAKE NOTICE that on November 4, 2020 (the “**Petition Date**”), the above-captioned debtors and debtors in possession (the “**Debtors**”) filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (“**Chapter 11 Petitions**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

PLEASE TAKE FURTHER NOTICE that in connection with the filing of the Chapter 11 Petitions, the Debtors filed the following motions and applications (collectively, the “**First Day Pleadings**”):

1. Motion of Debtors for Entry of an Order Directing Joint Administration of Chapter 11 Cases [Docket No. 6];
2. 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];
3. 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];

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.

4. 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];
5. 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];
6. 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]; and
7. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 12].

PLEASE TAKE FURTHER NOTICE that in support of the Chapter 11 Petitions and First Day Pleadings, the Debtors rely upon the *Declaration of Richard Arnold in Support of Chapter 11 Petitions and First Day Pleadings* [Docket No. 13].

PLEASE TAKE FURTHER NOTICE that a telephonic hearing on the First Day Pleadings (the “**First Day Hearing**”) has been scheduled for **November 6, 2020 at 12:30 p.m. (ET)** before the Honorable Karen B. Owens at the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 6th Floor, Courtroom No. 3, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that the First Day 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 in advance of the First Day Hearing. Only those parties that will be addressing the Court should

appear by video via Zoom in addition to their CourtCall registration. Zoom information can be found on the agenda for the First Day Hearing.

Dated: November 5, 2020
Wilmington, Delaware

Respectfully submitted,

POLSINELLI PC

/s/ Christopher A. Ward

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