




SO ORDERED.

SIGNED this 2nd day of May, 2018.


BENJAMIN A. KAHN
UNITED STATES BANKRUPTCY JUDGE

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF NORTH CAROLINA
GREENSBORO DIVISION**

In re:

MOREHEAD MEMORIAL HOSPITAL,

Debtor.

Case No. 17-10775

Chapter 11

**ORDER (I) APPROVING DISCLOSURE STATEMENT;
(II) ESTABLISHING FORMS AND PROCEDURES FOR SOLICITATION AND
TABULATION OF VOTES TO ACCEPT OR REJECT THE PLAN; (III) ESTABLISHING
DEADLINE AND PROCEDURES FOR FILING OBJECTIONS TO THE
CONFIRMATION OF THE PLAN; AND (IV) GRANTING RELATED RELIEF**

THIS MATTER came before the Court upon the *Order and Notice for Hearing on Disclosure Statement* (the “Disclosure Statement Notice and Order”) [Docket No. 701] and the *Debtor’s Motion for an Order (I) Approving Disclosure Statement; (II) Establishing Forms and Procedures for Solicitation and Tabulation of Votes to Accept or Reject the Plan; (III) Establishing Deadline and Procedures for Filing Objections to the Confirmation of the Plan; and (IV) Granting Related Relief* (the “Disclosure Statement Motion”)¹ [Docket No. 715] filed on

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Disclosure Statement Motion, the Plan, or the Disclosure Statement, as applicable.

April 4, 2018, by Morehead Memorial Hospital, the above-captioned Chapter 11 debtor and debtor-in-possession (the “Debtor”), for entry of an order (i) approving the *Disclosure Statement for Joint Chapter 11 Plan of Orderly Liquidation Pursuant to Section 1125 of the Bankruptcy Code* (the “Initial Disclosure Statement”) filed on March 21, 2018;² (ii) establishing procedures for solicitation and tabulation of votes to accept or reject the Plan, including (a) approving the form and manner of solicitation packages, (b) approving the form and manner of notice of the Confirmation Hearing, (c) establishing a Voting Record Date and approving procedures for distribution of solicitation packages, (d) approving forms of Ballots, (e) establishing deadline for receipt of Ballots, and (f) approving procedures for vote tabulating acceptances and rejections of the Plan; (iii) establishing procedures with respect to, and the deadline for filing objections to, the confirmation of the Plan; and (iv) granting related relief; and upon adequate and sufficient notice of the Disclosure Statement, Disclosure Statement Motion, and the hearing before the Court on April 25, 2018 to consider and rule on the adequacy of the information contained in the Disclosure Statement (the “Disclosure Statement Hearing”); and the Court having reviewed and considered (x) the Disclosure Statement Motion and all requested relief related thereto, (y) any objections thereto, and (z) the statements of counsel and evidence presented in support of the relief requested at the Disclosure Statement Hearing; and it appearing that the Court has jurisdiction over this matter; and it further appearing that the legal and factual bases set forth in the Disclosure Statement Motion and at the Disclosure Statement Hearing establish just cause for the relief granted herein; and it appearing that the relief requested in the Disclosure Statement Motion is in the best interest of the Debtor, its estate, and creditors, and other parties-

² On May 2, 2018, in response to comments made by the Court at the Disclosure Statement Hearing, the Plan Proponents filed the *Amended Disclosure Statement for First Amended Joint Chapter 11 Plan of Orderly Liquidation Pursuant to Section 1125 of the Bankruptcy Code* [Docket No. 770] (the “Disclosure Statement”) and the *First Amended Joint Chapter 11 Plan of Orderly Liquidation* [Docket No. 771] (the “Plan”).

in-interest; and upon the record of the Disclosure Statement Hearing and all other pleadings and proceedings in this Chapter 11 case, including the Disclosure Statement Motion; and after due deliberation thereon and good and sufficient cause appearing therefore:

IT IS HEREBY FOUND THAT:

1. This Court has jurisdiction to hear and determine the Disclosure Statement Motion pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

2. Notice of the Disclosure Statement Motion and the Disclosure Statement Hearing was served as proposed in the Disclosure Statement Motion, and such notice constitutes good and sufficient notice to all interested parties and no other or further notice need be provided.

3. The Disclosure Statement contains “adequate information” within the meaning of Section 1125 of the Bankruptcy Code.

4. All objections, responses to, and statements and comments, if any, in opposition to the Disclosure Statement, other than those withdrawn with prejudice or resolved in their entirety prior to, or on the record at, the Disclosure Statement Hearing, shall be, and hereby are, overruled in their entirety for the reasons stated on the record and, notwithstanding the foregoing, no objection shall be considered an objection to confirmation of the Plan unless such objection is interposed in accordance with the procedures for objecting to confirmation of the Plan set forth herein.

5. The forms of Ballot attached hereto as **Exhibit 2** are sufficiently consistent with Official Form No. B314 and adequately address the particular needs of this Chapter 11 Case and are appropriate for each of the respective classes of claims that is entitled to vote to accept or reject the Plan.

6. The content and proposed distribution of the Solicitation Packages complies with Bankruptcy Rule 3017(d).

7. Ballots need not be provided to holders of the Administrative Expense Claims, Priority Tax Claims, or claims in Class 1 (Priority Non-Tax Claims), Class 2 (Berkadia Secured Claim), Class 3 (First-Citizens Secured Claim), or Class 4 (Secured Claims of Other Lienholders) (each as defined in the Plan, and, collectively, the “Unclassified/Unimpaired Claimholders”), because such holders are either unclassified pursuant to Section 1123(a)(1) of the Bankruptcy Code or deemed to accept the Plan.

8. The period, set forth below, during which the Debtor may solicit acceptances to the Plan is a reasonable and adequate period of time under the circumstances for creditors to make an informed decision to accept or reject the Plan.

9. The procedures for the solicitation and tabulation of votes to accept or reject the Plan (as more fully set forth in the Disclosure Statement Motion and below) provide for a fair and equitable voting process and are consistent with Section 1126 of the Bankruptcy Code.

10. The notices substantially in the form attached hereto as **Exhibit 1** (the “Confirmation Hearing Notice”) and **Exhibit 3** (the “Notice of Non-Voting Status and Confirmation Hearing”); the procedures set forth below for providing such notice to all creditors and interest holders of the time, date, and place of the hearing to consider confirmation of the Plan (the “Confirmation Hearing”); and the contents of the Solicitation Packages comply with Bankruptcy Rules 2002 and 3017, and service of such materials as set forth herein constitutes sufficient notice to all interested parties.

IT IS HEREBY ORDERED, AND NOTICE IS GIVEN, THAT:

1. The Disclosure Statement Motion is GRANTED and all remaining objections to the Disclosure Statement Motion, if any, are OVERRULED on their merits and DENIED.

2. The Disclosure Statement is APPROVED (as so approved, the “Disclosure Statement”).

3. The date of entry of this Order is established as the voting record date (the “Voting Record Date”) for purposes of this Order and determining which holders of claims are entitled to vote on the Plan and/or receive materials approved by this Order, including notices of non-voting status.

4. The Debtor is authorized and empowered to commence distribution of the Confirmation Hearing Notice, within three (3) business days after the date of entry of this Order (the “Solicitation Commencement Date”).

5. The Debtor is authorized and empowered to commence distribution of the Confirmation Hearing Notice and the Solicitation Packages to the Voting Classes no later than the Solicitation Commencement Date. To the extent the Debtor is required to distribute copies of the Plan and/or Disclosure Statement, the Debtor may distribute either paper copies or electronic copies in “pdf” format on CD-ROM or USB Flash Drive, at their sole discretion; provided, that the Debtor shall make paper copies available upon written request by a party in interest.

6. By the Solicitation Commencement Date, the Debtor shall commence or cause service of a copy of (i) this Order (without the exhibits attached hereto), (ii) the Confirmation Hearing Notice, and (iii) the Disclosure Statement (together with the Plan and other exhibits attached thereto) to, among other parties (to the extent such parties did not otherwise receive Solicitation Packages):

- a) the Bankruptcy Administrator;
- b) the Internal Revenue Service;

- c) the United States Attorney for the Middle District of North Carolina; and
- d) all persons and entities that have filed a request for service of filings in the Chapter 11 Case pursuant to Bankruptcy Rule 2002.

7. The Ballots, which shall be in substantially the forms attached hereto as **Exhibit 2** are approved.

8. Solicitation Packages, which shall include individual Ballots, shall be distributed to the Voting Classes, which classes are designated under the Plan as entitled to vote to accept or reject the Plan.

9. Only a Notice of Non-Voting Status and Confirmation Hearing, substantially in the form attached hereto as **Exhibit 3**, shall be distributed to the Unclassified/Unimpaired Claimholders, which are either unclassified or conclusively deemed to accept the Plan. The notices will be served on the Unclassified/Unimpaired Claimholders by First Class Mail. The Debtor is not required to distribute copies of the Plan, Disclosure Statement, or this Order to any Unclassified/Unimpaired Claimholder, unless such holder makes a specific request in writing for the same.

10. With respect to addresses from which one or more prior notices served in this Chapter 11 Case were returned as undeliverable or from which mailings made pursuant to this Order are returned as undeliverable, the Debtor will make a good faith effort to identify alternative mailing addresses for those entities. If the Debtor is unable to obtain an updated address or forwarding address for such entities before the Solicitation Commencement Date, failure to deliver the Solicitation Packages or other applicable materials to such entities will not constitute inadequate notice of the Confirmation Hearing or the Voting Deadline or a violation of Bankruptcy Rule 3017(d).

11. All Ballots must be properly executed, completed, and delivered by First Class Mail, overnight courier, or hand delivery to the Administrative Agent so as to be actually received by no later than the Voting Deadline at the following address:

Donlin, Recano & Company, Inc.
Re: Morehead Memorial Hospital
Attn: Voting Department
P.O. Box 192016
Blythebourne Station
Brooklyn, NY 11219
Tel: (212) 771-1128
Fax: (212) 481-1416

Correspondence sent by hand delivery or overnight mail should be sent to:

Donlin, Recano & Company, Inc.
Re: Morehead Memorial Hospital
6201 15th Avenue
Brooklyn, NY 11219

provided, however, that Ballots transmitted to the Administrative Agent by facsimile, electronic mail, or other means not specifically approved by the Bankruptcy Court may be accepted by the Debtor in consultation with the Committee on a case-by-case basis.

12. For purposes of voting on the Plan, the amount of a claim held by a creditor shall be determined pursuant to the following guidelines:

- a) The amount of the claim listed in the Debtor's Schedules; provided that (i) such claim is not scheduled as any of contingent, unliquidated, undetermined, disputed, or in a zero dollar amount and (ii) no proof of claim has been timely filed (or otherwise deemed timely filed by the Bankruptcy Court under applicable law) with respect to such claim.
- b) The noncontingent and liquidated amount specified in a proof of claim timely filed with the Bankruptcy Court (or otherwise deemed timely filed by the Bankruptcy Court under applicable law) to the extent the proof of claim is not the subject of an objection filed by **May 25, 2018 at 4:00 p.m. (Eastern Daylight Time)** (the "Voting Objection Deadline") (or, if such claim has been resolved for allowance and/or voting purposes pursuant to a stipulation or order entered by the Bankruptcy Court, or otherwise resolved by the Bankruptcy Court, the amount set forth in such stipulation or order).

- c) If a proof of claim has been timely filed prior to the applicable bar date and such claim is asserted in the amount of \$0.00, such claim shall not be entitled to vote.
- d) Notwithstanding anything to the contrary in these tabulation rules, the holder of any claim that has been indefeasibly paid, in full or in part, shall only be permitted to vote the unpaid amount of such claim, if any, to accept or reject the Plan.
- e) The amount temporarily allowed or estimated by the Bankruptcy Court for voting purposes, pursuant to Bankruptcy Rule 3018(a), subject to notice consistent with the procedures set forth herein, the Bankruptcy Code, the Bankruptcy Rules and the Local Rules shall be the amount of the claim for voting purposes only.
- f) If a claim for which a proof of claim has been timely filed for unknown or undetermined amounts (as determined on the face of the claim or after a reasonable review of the supporting documentation by the Debtor or the Administrative Agent) and such claim has not been allowed, such Claim shall be temporarily allowed for voting purposes only, and not for purposes of allowance or distribution, at \$1.00.
- g) If a claim is listed on a timely filed proof of claim as either wholly or partially contingent or unliquidated, such claim is temporarily allowed in the amount that is the greater of (i) the liquidated and non-contingent amount and (ii) \$1.00, for voting purposes only, and not for purposes of allowance or distribution.
- h) If a claim is deemed allowed under the Plan, such claim is allowed for voting purposes in the deemed allowed amount set forth in the Plan.
- i) If a claim is not listed in the Schedules or is listed in the Schedules as contingent, unliquidated, or disputed (or in a zero amount) and a proof of claim was not (i) filed by the applicable bar date for the filing of proofs of claim established by the Bankruptcy Court or (ii) deemed timely filed by an order of the Bankruptcy Court prior to the Voting Deadline, such claim shall be disallowed for voting purposes.
- j) If a proof of claim has been amended by a later proof of claim that is filed on or prior to the Voting Record Date, the later filed amending claim shall be entitled to vote in a manner consistent with these tabulation rules, and the earlier filed claim shall be disallowed for voting purposes, regardless of whether the Debtor has objected to such amended claim. Except as otherwise ordered by the Bankruptcy Court, any amendments to proofs of claim after the Voting Record Date shall not be considered for purposes of these tabulation rules.

13. The temporary allowance of claims for voting purposes does not constitute an allowance of claims for purposes of distribution under the Plan and is without prejudice to the rights of the Debtor, the Committee, or any other party-in-interest in any other context, including, the right of the Debtor, the Committee, or any other party-in-interest to contest the amount or validity of any claim for purposes of allowance under the Plan.

14. The Debtor, in consultation with the Committee, may object to any claim (as defined in Section 101(5) of the Bankruptcy Code) solely for Plan voting purposes by filing a Determination Motion no later than the Voting Objection Deadline. If an objection to a claim (made by way of a Determination Motion or otherwise) filed on or before the Voting Deadline requests that such claim be reduced or reclassified, such claimant's Ballot shall be counted in such reduced amount or as the reclassified category. Further, if a creditor casts a Ballot and has timely filed a proof of claim (or has otherwise had a proof of claim deemed timely filed by the Bankruptcy Court under applicable law), but the creditor's claim is the subject of an objection (made by way of a Determination Motion or otherwise) filed no later than the Voting Objection Deadline, in accordance with Bankruptcy Rule 3018, the creditor's Ballot shall not be counted to the extent it is challenged by the objection, unless such claim is temporarily allowed by the Bankruptcy Court for voting purposes, pursuant to Bankruptcy Rule 3018(a), after the creditor files a motion for such temporary allowance (the "Claims Estimation Motion").

15. If a creditor seeks to have its claim temporarily allowed for purposes of voting to accept or reject the Plan pursuant to Bankruptcy Rule 3018(a), such creditor shall file a Claims Estimation Motion by the later of (i) the Voting Objection Deadline, or (ii) if such claim is the subject of an objection or a Determination Motion, seven (7) days after the filing of the applicable objection or Determination Motion.

16. In the event that a Determination Motion or Claims Estimation Motion is filed, the non-moving party shall file a reply to such motion by the later of (i) the Voting Objection Deadline, or (ii) seven (7) days after the filing of the applicable motion (the “Voting Objection Reply Deadline”), and a hearing, subject to the Bankruptcy Court’s availability, shall be scheduled within seven (7) days of the Voting Objection Reply Deadline but in no event later than the Confirmation Hearing. The ruling by the Bankruptcy Court on any Determination Motion or Claims Estimation Motion shall be considered a ruling with respect to the allowance of the claim(s) under Bankruptcy Rule 3018 and such claim(s) will be counted, for voting purposes only, in the amount determined by the Bankruptcy Court.

17. In the event that a claimant reaches an agreement with the Debtor, in consultation with the Committee, as to the treatment of its claim for voting purposes, the claim may be treated in such manner subject to providing three (3) business days’ notice to the Office of the U.S. Bankruptcy Administrator.

18. The following voting procedures and standard assumptions shall be used in tabulating the Ballots:

- a) For purposes of the numerosity requirement of Section 1126(c) of the Bankruptcy Code and based on the reasonable efforts of the Administrative Agent, separate claims held by a single creditor in a particular class will be aggregated as if such creditor held one claim against the Debtor in such class, and the votes related to such claims will be treated as a single vote to accept or reject the Plan.
- b) Any creditor who holds duplicate claims within the same class shall be provided with only one Solicitation Package and one Ballot for voting a single claim in such class, regardless of whether the Debtor has objected to such duplicate claims.
- c) Creditors must vote all of their claims within a particular class either to accept or reject the Plan and may not split their vote. Accordingly, a Ballot (or multiple Ballots with respect to multiple claims within a single class) that partially rejects and partially accepts the Plan will not be counted.

- d) Ballots that fail to indicate an acceptance or rejection of the Plan or that indicate both acceptance and rejection of the Plan, but which are otherwise properly executed and received prior to the Voting Deadline, will not be counted.
- e) Only Ballots that are timely received with signatures will be counted. Unsigned Ballots will not be counted.
- f) Ballots sent by mail or overnight delivery that are postmarked prior to the Voting Deadline, but received after the Voting Deadline, will not be counted.
- g) Ballots that are illegible, or contain insufficient information to permit the identification of the creditor, will not be counted.
- h) Ballots transmitted to the Administrative Agent by facsimile, electronic mail, or other means not specifically approved by the Bankruptcy Court may be accepted by the Debtor, in consultation with the Committee, on a case-by-case basis.
- i) Whenever a creditor casts more than one Ballot voting the same claim prior to the Voting Deadline, the last valid Ballot received prior to the Voting Deadline shall be deemed to reflect the voter's intent and supersede any prior received Ballots.
- j) If a creditor simultaneously casts inconsistent duplicate Ballots with respect to the same claim, such Ballots shall not be counted.
- k) Each creditor shall be deemed to have voted the full amount of its claim in a class. Unless otherwise ordered by the Bankruptcy Court, questions as to the validity, form, eligibility (including time of receipt), acceptance, and revocation or withdrawal of Ballots shall be determined by the Administrative Agent and the Debtor, which determination shall be final and binding.
- l) Any Ballot containing a vote that the Bankruptcy Court determines, after notice and a hearing, was not solicited or procured in good faith or in accordance with the provisions of the Bankruptcy Code shall not be counted.
- m) Any Ballot cast by a person or entity that does not hold a Claim in a class that is entitled to vote to accept or reject the Plan shall not be counted.
- n) Notwithstanding anything contained herein to the contrary, the Administrative Agent, in its discretion, may contact parties that submitted Ballots to cure any defects in the Ballots.

- o) Any class that does not contain any claim eligible to vote to accept or reject the Plan (by reason of temporary allowance by the Bankruptcy Court or otherwise) as of the date of the Confirmation Hearing shall be deemed eliminated from the Plan for purposes of voting to accept or reject the Plan and for purposes of determining acceptance or rejection of the Plan by such class pursuant to section 1129(a)(8) of the Bankruptcy Code.
- p) If a class contains claims eligible to vote and no holders of claims eligible to vote in such class vote to accept or reject the Plan, the Plan shall be deemed accepted by the holders of such claims in such class.
- q) Unless waived, any defects or irregularities in connection with deliveries of Ballots must be cured within such time as the Debtor or the Bankruptcy Court determines. Neither the Debtor nor any other person or entity shall be under any duty to provide notification of defects or irregularities with respect to deliveries of Ballots, nor shall any incur any liabilities for failure to provide such notification. Unless otherwise directed by the Bankruptcy Court, delivery of such Ballots shall not be deemed to have been made until such irregularities have been cured or waived. Ballots previously furnished (and as to which any irregularities have not theretofore been cured or waived) shall not be counted.
- r) The Debtor, in consultation with the Committee, and subject to contrary order of the Bankruptcy Court, may waive any defect in any Ballot at any time, either before or after the Voting Deadline and without notice, and any such waivers shall be documented in the voting results filed with the Bankruptcy Court.
- s) Except as provided below, unless the Ballot being furnished is timely submitted on or prior to the Voting Deadline, the Debtor may, in consultation with the Committee, reject such Ballot as invalid, and therefore, decline to utilize it in connection with confirmation of the Plan by the Bankruptcy Court; provided, however, that such invalid Ballots shall be documented in the voting results filed with the Bankruptcy Court.
- t) Subject to contrary order of the Bankruptcy Court, the Debtor, in consultation with the Committee, reserves the absolute right to reject any and all Ballots not proper in form, the acceptance of which would, in the opinion of the Debtor, in consultation with the Committee, not be in accordance with the provisions of the Bankruptcy Code; provided, however, that such invalid Ballots shall be documented in the voting results filed with the Bankruptcy Court.

19. The Confirmation Hearing Notice and Notice of Non-Voting Status and Confirmation Hearing are approved.

20. No later than **4:00 p.m. Eastern Daylight Time on June 8, 2018** (three business days prior to the Confirmation Hearing), the Administrative Agent shall file with the Bankruptcy Court a tabulation report for Plan voting and the Debtor shall file with the Bankruptcy Court a proposed form of confirmation order, a declaration in support of confirmation addressing the requirements of section 1129(a) of the Bankruptcy Code, and replies to any objections received by the Confirmation Objection Deadline.

21. The Confirmation Hearing will be held at **9:30 a.m. (Eastern Daylight Time) on June 13, 2018**; provided, however, that the Confirmation Hearing may be continued from time to time by the Bankruptcy Court or the Debtor without further notice other than an announcement at or before the Confirmation Hearing or any adjourned Confirmation Hearing or the filing of a notice or a hearing agenda providing for the adjournment on the docket of the Chapter 11 Case.

22. The Debtor shall mail to all creditors and equity security holders a copy of the Confirmation Hearing Notice or Notice of Non-Voting Status and Confirmation Hearing by First Class Mail, as set forth herein.

23. The Debtor shall also publish the Confirmation Hearing Notice once, as soon as reasonably practical after entry of this Order, in *The News & Record*.

24. Any objection, comment, or response to confirmation of the Plan (including any supporting memoranda) must:

- a) be in writing;
- b) comply with the Bankruptcy Rules and the Local Rules;
- c) set forth the name of the objector and the nature and amount of any Claim asserted by the objector against or in the Debtor;

- d) state with particularity the legal and factual bases for the objection and, if practicable, a proposed modification to the Plan that would resolve such objection; and
- e) be filed with the Bankruptcy Court, together with proof of service, and served so that they are actually received by the following parties no later than **June 1, 2018 at 4:00 p.m. (Eastern Daylight Time)** which deadline may be extended by the Debtor in its sole discretion (the “Confirmation Objection Deadline”): (i) counsel to the Debtor, Waldrep LLP, 101 S. Stratford Road, Suite 210, Winston-Salem, NC 27104, Attn: Thomas W. Waldrep, Jr., Jennifer B. Lyday, and Francisco T. Morales; (ii) counsel to the Committee, Sills Cummis & Gross P.C., One Riverfront Plaza, Newark, NJ 07102, Attn: Andrew H. Sherman and Boris I. Mankovetskiy, with a copy to Nelson Mullins Riley & Scarborough LLP, GlenLake One, Suite 200, 4140 Parklake Avenue, Raleigh, NC 27612, Attn: Terri L. Gardner; (iii) the Office of the United States Bankruptcy Administrator, 101 South Edgeworth Street, Greensboro, NC 27401, Attn: William P. Miller and Sarah Bruce; and (iv) all parties that have requested notice in this Chapter 11 Case pursuant to Bankruptcy Rule 2002 (collectively, the “Notice Parties”).

25. Objections to the confirmation of the Plan not timely filed and served in the manner set forth above shall not be considered by the Bankruptcy Court and shall be overruled.

26. Unless the Bankruptcy Court sets a later deadline, the Debtor and any other party supporting the Plan shall be afforded an opportunity to file a response to any objection to the confirmation of the Plan, which shall be filed by **4:00 p.m. (Eastern Daylight Time) on June 8, 2018**.

27. The Debtor is authorized to take or refrain from taking any action necessary or appropriate to implement the terms of and the relief granted in this Order without seeking further order of the Bankruptcy Court, including, but not limited to, the making of any payments reasonably necessary to perform the actions and distributions contemplated herein.

28. The Debtor, in consultation with the Committee, is authorized to make nonsubstantive changes to the Disclosure Statement, Plan, Ballot, Confirmation Hearing Notice, Notice of Non-Voting Status and Confirmation Hearing, and related documents without further

order of the Bankruptcy Court, including changes to correct typographical and grammatical errors and to make conforming changes among the Disclosure Statement, the Plan, and any other materials in the Solicitation Package prior to their distribution.

29. The Bankruptcy Court shall retain jurisdiction with respect to all matters related to this Order.

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