

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
LAREDO DIVISION**

In re:

WESTWIND MANOR RESORT  
ASSOCIATION, INC., *et al.*,<sup>1</sup>

Debtors.

)  
) Chapter 11

)  
) Case No. 19-50026 (DRJ)

)  
) Jointly Administered

**AGENDA FOR EMERGENCY HEARING ON  
FIRST DAY MOTIONS AND APPLICATIONS**

**Time and Date  
Of Hearing:**

**Emergency First Day Hearing  
March 6, 2019 at 12:30 pm (prevailing Central Time)**

**Location of Hearing:**

The Honorable David R. Jones  
United States Bankruptcy Judge  
515 Rusk Street, Courtroom 400  
Houston, Texas

**Copies of Pleadings:**

A copy of each pleading can be viewed (a) for a fee on the court's website at <https://ecf.txsb.uscourts.gov/>, or (b) free of charge on the website of the Debtors' proposed claims and noticing agent, Donlin, Recano & Company, Inc. at <https://www.donlinrecano.com/Clients/warrior>.

**I. MOTIONS AND APPLICATIONS TO BE HEARD AT THIS EMERGENCY  
FIRST DAY HEARING**

**1. Joint Administration Motion:** Debtors' Emergency Motion For Entry Of An  
Order Directing Joint Administration Of Chapter 11 Cases [Docket No. 2]

- a. The Debtors have received informal comments from the U.S. Trustee.
- b. Status: The hearing on this matter is going forward.

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Westwind Manor Resort Association, Inc. (7533); Warrior ATV Golf, LLC (3420); Warrior Acquisitions, LLC (9919); Warrior Golf Development, LLC (5741); Warrior Golf Management, LLC (7882); Warrior Golf Assets LLC (1639); Warrior Golf Venture, LLC (7752); Warrior Premium Properties, LLC (0220); Warrior Golf, LLC (4207); Warrior Custom Golf, Inc. (2941). The address of the Debtors' corporate headquarters is 15 Mason, Suite A, Irvine, California 92618.

2. **Consolidated List of Creditors Motion:** Debtors' Emergency Motion For Entry Of An Order (I) Authorizing Consolidated Creditors Lists, (II) Authorizing The Extension Of The Deadline To File Schedules And Statements Of Financial Affairs, And (III) Approving The Form And Manner Of Notifying Creditors Of The Commencement Of The Chapter 11 Cases And Other Information [Docket No. 12]
  - a. The Debtors have received informal comments from the U.S. Trustee.
  - b. Revised proposed order and redline thereto filed as docket number 22.
  - c. Status: The hearing on this matter is going forward.
3. **DIP Motion:** Debtors' Emergency Motion For Entry Of Interim And Final Orders (I) **Authorizing The Debtors To Obtain Postpetition Financing** (II) **Granting Security Interests And Superpriority Administrative Expense Status;** (III) **Modifying The Automatic Stay;** (IV) **Authorizing The Debtors To Enter Into Agreements With Warrior Golf Loan Investors, LLC;** (V) **Scheduling A Final Hearing And** (VI) **Granting Related Relief** [Docket No. 13]
  - a. The Debtors have received informal comments from the U.S. Trustee.
  - b. Status: The hearing on this matter is going forward.
4. **Ordinary Course Customers Motion:** Debtors' Emergency Motion For Entry Of Interim And Final Orders Authorizing The Debtors To Honor Prepetition Obligations To Customers In The Ordinary Course Of Business [Docket No. 6]
  - a. The Debtors have received informal comments from the U.S. Trustee.
  - b. Revised proposed order and redline thereto filed as docket number 16.
  - c. Status: The hearing on this matter is going forward.
5. **Wage Motion:** Debtors' Emergency Motion For Entry Of Interim And Final Orders Authorizing The Debtors To (I) Pay Prepetition Wages, Salaries, Other Compensation, And Reimbursable Expenses, And (II) Continue Employee Benefits Programs [Docket No. 4]
  - a. The Debtors have received informal comments from the U.S. Trustee.
  - b. Revised proposed order and redline thereto filed as docket number 19.
  - c. Status: The hearing on this matter is going forward.

6. **Cash Management Motion:** Debtors' Emergency Motion For Entry Of Interim And Final Orders Authorizing The Debtors To (I) Continue To Operate Their Cash Management System, (II) Honor Certain Prepetition Obligations Related Thereto And (III) Maintain Existing Business Forms [Docket No. 5]
  - a. The Debtors have received informal comments from the U.S. Trustee.
  - b. Status: The hearing on this matter is going forward.
7. **Taxes Motion:** Debtors' Emergency Motion For Entry Of Interim And Final Orders Authorizing The Payment Of Certain Prepetition Taxes And Fees [Docket No. 7]
  - a. The Debtors have received informal comments from the U.S. Trustee.
  - b. Revised proposed order and redline thereto filed as docket number 17.
  - c. Status: The hearing on this matter is going forward.
8. **Utility Motion:** Debtors' Emergency Motion For Entry Of Interim And Final Orders (I) Approving The Debtors' Proposed Adequate Assurance Of Payment For Future Utility Services, (II) Prohibiting Utility Companies From Altering, Refusing, Or Discontinuing Services, And (III) Approving The Debtors' Proposed Procedures For Resolving Additional Assurance Requests [Docket No. 8]
  - a. The Debtors have received informal comments from the U.S. Trustee.
  - b. Revised proposed order and redline thereto filed as docket number 18.
  - c. Status: The hearing on this matter is going forward.
9. **Claims and Noticing Agent Application:** Debtors' Emergency Application For An Order Appointing Donlin, Recano & Company, Inc. As Claims And Noticing Agent For The Debtors Pursuant To 28 U.S.C. § 156(C), *Nunc Pro Tunc*, To The Petition Date [Docket No. 3]
  - a. The Debtors have received informal comments from the U.S. Trustee.
  - b. Revised proposed order and redline thereto filed as docket number 20.
  - c. Status: The hearing on this matter is going forward.

**II. RELATED DOCUMENTS & OTHER MATTERS**

**10. First Day Declaration:** *Declaration of Jeremy Rosenthal in Support of Debtors' Chapter 11 Petitions and First Day Relief* [Docket No. 9]

Dated: March 5, 2019

Respectfully submitted,

By: /s/ Michael D. Warner

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Benjamin L. Wallen (TX Bar No. 24102623)

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*Proposed Counsel for the Debtors*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 5<sup>th</sup> day of March, 2019, a true and correct copy of the above and foregoing has been served by electronic transmission to all registered ECF users appearing in these cases.

/s/ Michael D. Warner

Michael D. Warner