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PROPOSED ATTORNEYS FOR DEBTORS

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

In re:	§	Chapter 11
	§	
Corsicana Bedding, LLC, <i>et al.</i> , ¹	§	Case No. 22-90016-elm11
	§	
Debtors.	§	Joint Administration Requested

**AGENDA
OF MATTERS SCHEDULED FOR HEARING
JUNE 27, 2022**

Matters Set for June 27, 2022 at 3:30 p.m.

A. JOINT ADMINISTRATION MOTION

Debtors' Emergency Motion for Entry of Order Authorizing Joint Administration of Chapter 11 Cases Pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure [Docket No. 2]

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Corsicana Bedding, LLC (3019) ("Corsicana"); Thetford Leasing LLC (7227) ("Thetford"); Olive Branch Building, LLC (7227) ("Olive Branch"); Eastern Sleep Products Company (1185) ("Eastern Sleep"); Englander-Symbol Mattress of Mississippi, LLC (5490) ("Englander Symbol"); Hylton House Furniture, Inc. (5992) ("Hylton House"); Luuf, LLC (3450) ("Luuf"); Symbol Mattress of Florida, Inc. (4172) ("Symbol Florida"); Symbol Mattress of Pennsylvania, Inc. (3160) ("Symbol Pennsylvania"); Symbol Mattress of Wisconsin, Inc. (0871) ("Symbol Wisconsin"); Symbol Mattress Transportation, Inc. (1185) ("Symbol Transportation"); and Master Craft Sleep Products, Inc. (4961) ("Master Craft"). The location of the Debtors' service address is P.O. Box 3233, Fort Worth, TX 76113.

Response Deadline: Prior to hearing

Status: Going forward

Related Matters:

1. Declaration of Michael Juniper in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Docket No. 15]
2. Request for Emergency Consideration of Certain "First Day" Matters [Docket No. 17]
3. Notice of Emergency Hearing on Certain "First Day" Matters [Docket No. 18]
4. Certificate of Conference Regarding Debtors' First Day Matters [Docket No. 19]

B. COMPLEX CHAPTER 11 CASE MOTION

Notice of Designation as Complex Chapter 11 Bankruptcy Cases [Docket No. 4]

Response Deadline: Prior to hearing

Status: Going forward

Related Matters:

1. Request for Emergency Consideration of Certain "First Day" Matters [Docket No. 17]
2. Notice of Emergency Hearing on Certain "First Day" Matters [Docket No. 18]
3. Certificate of Conference Regarding Debtors' First Day Matters [Docket No. 19]

D. MOTION TO FILE CONSOLIDATED MATRIX

Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to File a Consolidated List of Creditors, (II) Authorizing the Debtors to Redact Certain Personal Identification Information of Individual Creditors and Current and Former Employees, and (III) Approve the Form and Manner of Notifying Creditors of the Commencement of the Debtors' Chapter 11 Cases and Bar Date [Docket No. 5]

Response Deadline: Prior to hearing

Status: Going forward

Related Matters:

1. Declaration of Michael Juniper in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Docket No. 15]
2. Request for Emergency Consideration of Certain "First Day" Matters [Docket No. 17]
3. Notice of Emergency Hearing on Certain "First Day" Matters [Docket No. 18]
4. Certificate of Conference Regarding Debtors' First Day Matters [Docket No. 19]
5. Debtors' Witness and Exhibit List for June 27, 2022 Hearing [Docket No. 20]

E. WAGE MOTION

Debtors' Emergency Motion for Order (I) Authorizing Debtors to Pay Certain Prepetition Employee Wages, Other Compensation and Reimbursable Employee Expenses; (II) Continuing Employee Benefits Programs; (III) Authorizing Financial Institutions to Honor and Process Checks and Transfers Related to Such Obligations Pursuant to Sections 105(a), 363(a), and 507(a) of the Bankruptcy Code and Bankruptcy Rules 6003 and 6004, and (IV) Granting Related Relief [Docket No. 6]

Response Deadline: Prior to hearing

Status: Going forward

Related Matters:

1. Declaration of Michael Juniper in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Docket No. 15]
2. Request for Emergency Consideration of Certain "First Day" Matters [Docket No. 17]
3. Notice of Emergency Hearing on Certain "First Day" Matters [Docket No. 18]
4. Certificate of Conference Regarding Debtors' First Day Matters [Docket No. 19]

F. CASH MANAGEMENT MOTION

Debtors' Emergency Motion for Entry of an Order (I) Authorizing Maintenance of Existing Corporate Bank Accounts and Cash Management System; (II) Waiving Certain U.S. Trustee Requirements; and (III) Authorizing Continuation of Intercompany Transactions with Section 364(a) Administrative Priority [Docket No. 7];

Response Deadline: Prior to hearing

Status: Going forward

Related Matters:

1. Declaration of Michael Juniper in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Docket No. 15]
2. Request for Emergency Consideration of Certain "First Day" Matters [Docket No. 17]
3. Notice of Emergency Hearing on Certain "First Day" Matters [Docket No. 18]
4. Certificate of Conference Regarding Debtors' First Day Matters [Docket No. 19]
5. Debtors' Witness and Exhibit List for June 27, 2022 Hearing [Docket No. 20]

G. INSURANCE MOTION

Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors to (A) Continue Insurance Coverage Entered into Prepetition and Satisfy Prepetition and Postpetition Obligations Thereunder, (B) Renew, Amend, Supplement, Extend, or Purchase Insurance Policies, and (II) Granting Related Relief [Docket No. 8];

Response Deadline: Prior to hearing

Status: Going forward

Related Matters:

1. Declaration of Michael Juniper in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Docket No. 15]
2. Request for Emergency Consideration of Certain "First Day" Matters [Docket No. 17]
3. Notice of Emergency Hearing on Certain "First Day" Matters [Docket No. 18]
4. Certificate of Conference Regarding Debtors' First Day Matters [Docket No. 19]
5. Debtors' Witness and Exhibit List for June 27, 2022 Hearing [Docket No. 20]

H. TAX MOTION

Debtors' Emergency Motion for Entry of an Order (I) Authorizing Debtors to Pay Prepetition Taxes and (II) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers Pursuant to Sections 105(a), 363(b), 507(a)(8), and 541(d) of the Bankruptcy Code [Docket No. 9];

Response Deadline: Prior to hearing

Status: Going forward

Related Matters:

1. Declaration of Michael Juniper in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Docket No. 15]
2. Request for Emergency Consideration of Certain "First Day" Matters [Docket No. 17]
3. Notice of Emergency Hearing on Certain "First Day" Matters [Docket No. 18]
4. Certificate of Conference Regarding Debtors' First Day Matters [Docket No. 19]
5. Debtors' Witness and Exhibit List for June 27, 2022 Hearing [Docket No. 20]

I. UTILITIES MOTION

Debtors' Emergency Motion for an Order Under 11 U.S.C. §§ 105(a) and 366 (I) Prohibiting Utility Companies From Altering or Discontinuing Service on Account of Prepetition Invoices, (II) Approving Deposit Account as Adequate Assurance of Payment, and (III) Establishing Procedures for Resolving Requests by Utility Companies for Additional Assurance of Payment [Docket No. 10];

Response Deadline: Prior to hearing

Status: Going forward

Related Matters:

1. Declaration of Michael Juniper in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Docket No. 15]
2. Request for Emergency Consideration of Certain "First Day" Matters [Docket No. 17]
3. Notice of Emergency Hearing on Certain "First Day" Matters [Docket No. 18]
4. Certificate of Conference Regarding Debtors' First Day Matters [Docket No. 19]
5. Debtors' Witness and Exhibit List for June 27, 2022 Hearing [Docket No. 20]

J. CUSTOMER PROGRAMS MOTION

Debtors' Emergency Motion for Entry of an Order Authorizing the Debtors to Honor Certain Prepetition Obligations to Customers and to Otherwise Continue Customer Programs in the Ordinary Course of Business [Docket No. 11];

Response Deadline: Prior to hearing

Status: Going forward

Related Matters:

1. Declaration of Michael Juniper in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Docket No. 15]
2. Request for Emergency Consideration of Certain "First Day" Matters [Docket No. 17]
3. Notice of Emergency Hearing on Certain "First Day" Matters [Docket No. 18]
4. Certificate of Conference Regarding Debtors' First Day Matters [Docket No. 19]
5. Debtors' Witness and Exhibit List for June 27, 2022 Hearing [Docket No. 20]

C. DRC RETENTION MOTION

Debtors' Emergency Application for Authorization to Retain and Employ Donlin, Recano & Company, Inc. as Claims, Noticing and Solicitation Agent Effective as of the Petition Date [Docket No. 12]

Response Deadline: Prior to hearing

Status: Going forward

Related Matters:

1. Declaration of Michael Juniper in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Docket No. 15]
2. Request for Emergency Consideration of Certain "First Day" Matters [Docket No. 17]
3. Notice of Emergency Hearing on Certain "First Day" Matters [Docket No. 18]
4. Certificate of Conference Regarding Debtors' First Day Matters [Docket No. 19]
5. Debtors' Witness and Exhibit List for June 27, 2022 Hearing [Docket No. 20]

K. DIP MOTION

Debtors' Emergency Motion for Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, 503 and 507 (I) Authorizing the Debtors to Obtain Senior Secured Superpriority Postpetition Financing; (II) Granting (A) Liens and Superpriority Administrative Expense Claims and (B) Adequate Protection to Certain Prepetition Lenders; (III) Authorizing Use Of Cash Collateral; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [Docket Nos. 13 & 14]

Response Deadline: Prior to hearing

Status: Going forward

Related Matters:

1. Declaration of Michael Juniper in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Docket No. 15]
2. Request for Emergency Consideration of Certain "First Day" Matters [Docket No. 17]
3. Notice of Emergency Hearing on Certain "First Day" Matters [Docket No. 18]
4. Certificate of Conference Regarding Debtors' First Day Matters [Docket No. 19]
5. Debtors' Witness and Exhibit List for June 27, 2022 Hearing [Docket No. 20]
6. Cash Collateral & DIP Financing Checklist [Docket No. 21]

RESPECTFULLY SUBMITTED this 25th day of June, 2022.

By: /s/ Stephen M. Pezanosky
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