

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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 In re : Chapter 11
 :
 Rural/Metro Corporation, et al.,¹ : Case No. 13-11952 (KJC)
 :
 Debtors. : (Jointly Administered)
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**NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR HEARING ON DECEMBER 17, 2013 AT 9:30 A.M. (ET)**

RESOLVED MATTERS

1. GF Pima Owner 7, LLC’s Motion to Compel Debtor Rural Metro Operating Company, LLC to Accept or Reject Its Lease Immediately [D.I. 219; 9/5/13]

Related Documents: None.

Objection Deadline: September 24, 2013 at 4:00 p.m. (ET)

Objections/Responses Received:

- a) Debtors’ Response to GF Pima Owner 7, LLC’s Motion to Compel Debtor Rural Metro Operating Company, LLC to Assume or Reject Lease of Real Property [D.I. 352; 9/24/13]

Status: The lease in question was listed as an unexpired lease to be assumed through the Plan on the *Notice of (I) Possible Assumption of Contracts and Leases, (II) Fixing of Cure Amounts, and (III) Deadline to Object Thereto* [Docket No. 702] and the cure amount relating to same was corrected on the *Notice of Filing of Second Amendment to Schedule of Assume Contracts and Leases and Cure Schedule* [Docket No. 769]. As such, the parties are in agreement that this matter is moot.

2. Debtors’ Motion for an Order Pursuant to 28 U.S.C. § 1452 and Bankruptcy Rules 9006 and 9027 Extending the Debtors’ Time to File Notices of Removal of Claims and Causes of Action Related to the Debtors’ Chapter 11 Proceedings [D.I. 589; 11/1/13]

¹ A list of the Debtors in these chapter 11 cases and the last four digits of each Debtor’s taxpayer identification number is attached as Schedule 1 to the Declaration of Stephen Farber in Support of Chapter 11 Petition and First Day Pleadings [Docket No. 2] and at www.donlinrecano.com/rmc. The Debtors’ headquarters are located at 9221 E. Via de Ventura, Scottsdale, AZ 85258.

Related Documents:

- a) Certificate of No Objection [D.I. 664; 11/19/13]
- b) Order Extending the Debtors' Time to File Notices of Removal of Claims and Causes of Action Related to the Debtors' Chapter 11 Proceedings [D.I. 678; 11/22/13]

Objection Deadline: November 15, 2013 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Status: An order has been entered by the Court. No hearing is necessary.

- 3. Debtors' Motion Pursuant to Sections 105 and 363 of the Bankruptcy Code and Bankruptcy Rule 9019 for an Order Approving and Authorizing the Settlement Agreement By and Between Pacific Ambulance, Inc. and Bowers Companies, Inc., the United States Department of Justice, and Relator [D.I. 591; 11/1/13]

Related Documents:

- a) Certificate of No Objection [D.I. 671; 11/20/13]
- b) Order Granting Debtors' Motion Pursuant to Sections 105 and 363 of the Bankruptcy Code and Bankruptcy Rule 9019 for an Order Approving and Authorizing the Settlement Agreement By and Between Pacific Ambulance, Inc. and Bowers Companies, Inc., the United States Department of Justice, and Relator [D.I. 679; 11/22/13]

Objection Deadline: November 18, 2013 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Status: An order has been entered by the Court. No hearing is necessary.

UNCONTESTED MATTERS WITH CERTIFICATE OF NO OBJECTION

- 4. Class Representatives' Motion for an Order Certifying the Class for Purposes of the Class Claim Pursuant to Fed. R. Civ. P. 23 and Fed. R. Bankr. P. 7023 and 9014(c), or, in the Alternative, for Relief from the Automatic Stay [D.I. 465; 10/15/13]

Related Documents:

- a) Certificate of No Objection [D.I. 765; 12/10/13]

- b) [Proposed] Order Certifying the Class for Purposes of the Class Claim Pursuant to Fed. R. Civ. P. 23 and Fed. R. Bankr. P. 7023 and 9014(c) [D.I. 766; 12/10/13]

Objection Deadline: October 29, 2013 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Status: A certificate of no objection has been filed with respect to this matter. No hearing is necessary.

- 5. Debtors' Motion Pursuant to Sections 105 and 363 of the Bankruptcy Code and Bankruptcy Rule 9019 for an Order Approving and Authorizing the Settlement Agreement By and Between Pacific Ambulance, Inc. and Auristela Perez, Alyda Perez and Pedro Perez, Jr. [D.I. 688; 11/25/13]

Related Documents:

- a) Certificate of No Objection [D.I. 780; 12/11/13]

Objection Deadline: December 9, 2013 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Status: A certificate of no objection has been filed with respect to this matter. No hearing is necessary.

CONTESTED MATTERS GOING FORWARD

- 6. Motion by Lisa McCall-Stowers, Individually and as Guardian of Rhonda McCall, Incompetent, and as Guardian and Next Friend of D.M., a Minor, Roger W. McCall, Sr., Wilma McCall and Roger W. McCall, Jr. Pursuant to 11 U.S.C. § 362 for Relief from the Automatic Stay [D.I. 196; 8/29/13]

Related Documents: None.

Objection Deadline: September 12, 2013 at 4:00 p.m. (ET); Extended for the Debtors and the Official Committee of Unsecured Creditors to September 20, 2013 at 4:00 p.m. (ET)

Objections/Responses Received:

- a) Debtors' Objection to the Motion by Lisa McCall-Stowers, Individually and as Guardian of Rhonda McCall, Incompetent, and as Guardian and Next Friend of D.M., a Minor, Roger W. McCall, Sr., Wilma McCall and Roger W. McCall, Jr. Pursuant to 11 U.S.C. § 362 for Relief from the Automatic Stay [D.I. 348; 9/20/13]

- b) Joinder of the Official Committee of Unsecured Creditors to Debtors' Objection to the Motion by Lisa McCall-Stowers, Individually and as Guardian of Rhonda McCall, Incompetent, and as Guardian and Next Friend of D.M., a Minor, Roger W. McCall, Sr., Wilma McCall and Roger W. McCall, Jr. Pursuant to 11 U.S.C. § 362 for Relief from the Automatic Stay [D.I. 350; 9/20/13]
- c) Joinder of Credit Suisse AG, in its Capacity as Prepetition Secured Facility Agent and DIP Agent, to the Debtors' Objection to the Motion by Lisa McCall-Stowers, Individually and as Guardian of Rhonda McCall, Incompetent, and as Guardian and Next Friend of D.M., a Minor, Roger W. McCall, Sr., Wilma McCall and Roger W. McCall, Jr. Pursuant to 11 U.S.C. § 362 for Relief from the Automatic Stay [D.I. 351; 9/20/13]
- d) Reply to Objections to the Motion by Lisa McCall-Stowers, Individually and as Guardian of Rhonda McCall, Incompetent, and as Guardian and Next Friend of D.M., a Minor, Roger W. McCall, Sr., Wilma McCall and Roger W. McCall, Jr. Pursuant to 11 U.S.C. § 362 for Relief from the Automatic Stay and Request that Hearing be Deemed a Status Conference [D.I. 373; 9/26/13]

Status: The Debtors' believe that this matter has been mooted by language included in the proposed order confirming the Plan. This matter is going forward.

7. Motion for Relief from the Automatic Stay by Stephanie Nelson [D.I. 226; 9/9/13]

Related Documents: None.

Objection Deadline: September 24, 2013 at 4:00 p.m. (ET); Extended for the Debtors, the Official Committee of Unsecured Creditors, the Lenders and the Bondholders to September 25, 2013 at 4:00 p.m. (ET)

Objections/Responses Received:

- a) Debtors' Objection to the Motion by Stephanie Nelson Pursuant to 11 U.S.C. § 362 for Relief from the Automatic Stay [D.I. 359, 9/24/13]
- b) Joinder of Credit Suisse AG, in its Capacity as Prepetition Secured Facility Agent and DIP Agent, to the Debtors' Objection to the Motion by Stephanie Nelson Pursuant to 11 U.S.C. § 362 for Relief from the Automatic Stay [D.I. 384, 9/27/13]

Status: The parties are currently working towards resolving this matter and anticipate coming to a resolution prior to the hearing. This matter is going forward.

8. Confirmation of First Amended Joint Chapter 11 Plan of Reorganization for Rural/Metro Corporation and Its Affiliated Debtors (Solicitation Version) [D.I. 604; 11/5/13]

Related Documents:

- a) Order (I) Approving Disclosure Statement, (II) Fixing Voting Record Date, (III) Scheduling Plan Confirmation Hearing and Approving Form and Manner of Related Notice and Objection Procedures, (IV) Approving Solicitation Packages and Procedures for the Distribution Thereof, (V) Approving Forms of Ballots and Voting Procedures, (VI) Approving Form and Manner of Notices to Non-Voting Plan Classes, (VII) Fixing Voting Deadline, (VIII) Approving Vote Tabulation Procedures, (IX) Approving Cure Procedures, and (X) Approving Rights Offering Procedures [D.I. 597; 11/5/13]
- b) Notice of (I) Approval of Disclosure Statement, (II) Establishment of Record Date, (III) Hearing on Confirmation of the Plan and Procedures for Objecting to Confirmation of the Plan, (IV) Approving Cure Procedures, and (V) Procedures and Deadline for Voting on the Plan [D.I. 599; 11/5/13]
- c) Disclosure Statement with Respect to First Amended Joint Chapter 11 Plan of Reorganization for Rural/Metro Corporation and Its Affiliated Debtors (Solicitation Version) [D.I. 605; 11/5/13]
- d) Certification of Publication of Alice Weber in the New York Times Regarding Notice of (I) Approval of Disclosure Statement, (II) Establishment of Record Date, (III) Hearing on Confirmation of the Plan and Procedures for Objecting to Confirmation of the Plan, (IV) Approving Cure Procedures, and (V) Procedures and Deadline for Voting on the Plan [D.I. 618; 11/11/13]
- e) Notice of Rescheduled Hearing [D.I. 680; 11/22/13]
- f) Notice of (I) Possible Assumption of Contracts and Leases, (II) Fixing of Cure Amounts, and (III) Deadline to Object Thereto [D.I. 702; 11/27/13]
- g) Notice of Filing of Supplement to the First Amended Joint Chapter 11 Plan of Reorganization for Rural/Metro Corporation and Its Affiliated Debtors [D.I. 705; 12/2/13]

- h) Notice of Filing of Schedule of Rejected Contracts and Leases [D.I. 711; 12/3/13]
- i) Notice of Filing of Amendment to Schedule of Rejected Contracts and Leases [D.I. 730; 12/6/13]
- j) Notice of Filing of Amendment to Schedule of Assumed Contracts and Leases and Cure Schedule [D.I. 735; 12/6/13]
- k) Notice of Filing of Second Amendment to Schedule of Assumed Contracts and Leases and Cure Schedule [D.I. 769; 12/10/13]
- l) Notice of Filing of Amended Schedule of Rejected Contracts and Leases [D.I. 789; 12/11/13]
- m) Notice of Filing of Third Amendment to Schedule of Assumed Contracts and Leases and Cure Schedule [D.I. 790; 12/11/13]
- n) Declaration of Jung W. Song on Behalf of Donlin, Recano & Company, Inc. Regarding Voting and Tabulation of Ballots Accepting and Rejecting First Amended Joint Chapter 11 Plan of Reorganization for Rural/Metro Corporation and Its Affiliated Debtors [D.I. 798; 12/13/13]
- o) Notice of Filing of Blackline Version of First Amended Plan [D.I. 801; 12/13/13]
- p) Declaration of Stephen Farber in Support of Confirmation of First Amended Joint Chapter 11 Plan of Reorganization for Rural/Metro Corporation and Its Affiliated Debtors [D.I. 804; 12/13/13]
- q) Notice of Filing of Proposed Confirmation Order [D.I. 805; 12/13/13]
- r) Debtors' Memorandum of Law in Support of Confirmation of Debtors' First Amended Joint Chapter 11 Plan of Reorganization for Rural/Metro Corporation and Its Affiliated Debtors [D.I. 806; 12/13/13]
- s) Debtors' Motion for Leave to Exceed Page Limit Requirements With Respect to Debtors' Memorandum of Law in Support of Confirmation of Debtors' First Amended Joint Chapter 11 Plan of Reorganization for Rural/Metro Corporation and Its Affiliated Debtors [D.I. 807; 12/13/13]
- t) Declaration of Brandon Aebersold of Lazard Frères & Company LLC in Support of Confirmation of Plan of Reorganization [D.I. 808; 12/13/13]

- u) Notice of Filing of First Amended Supplement to the First Amended Joint Chapter 11 Plan of Reorganization for Rural/Metro Corporation and Its Affiliated Debtors [D.I. 809; 12/13/13]

Objection Deadline: December 9, 2013 at 4:00 p.m. (ET)² [Extended to December 10, 2013 for Messrs. Iskander, Cates and Sleiman, RBC Capital Markets, and PA Attorney General; Extended to December 11, 2013 for American International Group, Inc.; Extended to December 12, 2013 for ACE American Insurance Company, Luge & Sons Development, Inc., and City of Scottsdale, Arizona]

Objections/Responses Received:

- a) Preliminary Objection [of Lisa McCall-Stowers] to First Amended Chapter 11 Plan of Reorganization for Rural/Metro Corporation and Its Affiliated Debtors [D.I. 613; 11/11/13]. *This matter is going forward.*
- b) Joinder of Carol Dewitt and the Estate of Richard Dewitt, Ruth Blevins and the Estate of Teddy Blevins, and Hubert Kelso and Sharyel Graul, Individually and as Personal Representative of Marie Kelso to Preliminary Objection to First Amended Chapter 11 Plan of Reorganization for Rural/Metro Corporation and Its Affiliated Debtors [D.I. 721; 12/5/13]. *This matter is going forward.*
- c) Joinder of Martha Ann Care, Individually and on behalf of the Statutory Beneficiaries of David Carey, to Preliminary Objection to First Amended Chapter 11 Plan of Reorganization for Rural/Metro Corporation and Its Affiliated Debtors [D.I. 726; 12/6/13]. *This matter is going forward.*
- d) Objection of Town of Florence to Cure Amount [D.I. 732; 12/6/13]. *This matter has been resolved through the Notice of Filing of Second Amendment to Schedule of Assumed Contracts and Leases and Cure Schedule [Docket No. 769] (the “Second Amended Cure Schedule”).*
- e) Limited Objection of BMO Harris Bank N.A. to Proposed Cure Amounts in Debtors’ Notice of (I) Possible Assumption of Contracts and Leases, (II) Fixing of Cure Amounts, and (III) Deadline to Object Thereto [D.I. 734; 12/6/13]. *This matter has been resolved through the Notice of Filing of Third Amendment to Schedule of Assumed Contracts and Leases and Cure Schedule [Docket No. 790] (the “Third Amended Cure Schedule”).*

² This deadline applies to both the First Amended Plan [D.I. 604] and the Cure Notice [D.I. 702].

- f) IAFF Local I-60's Objection to Confirmation of the First Amended Joint Chapter 11 Plan of Reorganization for Rural/Metro Corporation and Its Affiliated Debtors [D.I. 738; 12/9/13]. *This matter has been resolved through language added to the proposed order confirming the Plan.*
- g) Limited Objection of Business & Decision North America (PA), Inc. with Respect to Cure Amount [D.I. 740; 12/9/13]. *This matter has been resolved through the Second Amended Cure Schedule and the Third Amended Cure Schedule.*
- h) Objection of Robert E. Ramsey to First Amended Chapter 11 Plan of Reorganization for Rural/Metro Corporation and Its Affiliated Debtors [D.I. 741; 12/9/13]. *The parties are working towards resolving this matter and hope to have a resolution prior to the hearing.*
- i) Objection of Emerg E Data Inc. to Proposed Cure Amounts in Debtors' Notice of (I) Possible Assumption of Contracts and Leases, (II) Fixing of Cure Amounts, and (III) Deadline to Object Thereto [D.I. 742; 12/9/13]. *The parties are in agreement that the cure set forth on the Notice of (I) Possible Assumption of Contracts and Leases, (II) Fixing of Cure Amounts, and (III) Deadline to Object Thereto [Docket No. 702] (the "Initial Cure Schedule") is correct. As such, the parties are in agreement that this matter is moot.*
- j) Objection of CIT Finance LLC to Debtors' (I) Cure Schedule and (II) Confirmation of Plan [D.I. 744; 12/9/13]. *This matter has been resolved pursuant to the Third Amended Cure Schedule and language in the proposed order confirming the Plan.*
- k) Objection by the Internal Revenue Service to the First Amended Joint Chapter 11 Plan of Reorganization for Rural/Metro Corporation and Its Affiliated Debtors [D.I. 745; 12/9/13]. *This matter has been resolved through language in the proposed order confirming the Plan.*
- l) Joinder of Aaron and Stephanie Miller, Individually and on behalf of the Estate of A.M., a Minor, to Preliminary Objection to First Amended Chapter 11 Plan of Reorganization for Rural/Metro Corporation and Its Affiliated Debtors [D.I. 746; 12/9/13]. *This matter is going forward.*
- m) Stephanie Nelson's Objection to the First Amended Chapter 11 Plan of Reorganization for Rural/Metro Corporation and Its Affiliated Debtors [D.I. 747; 12/9/13]. *This matter has been resolved through language in the proposed order confirming the Plan.*

- n) Objection of City of Scottsdale, Arizona to Notice of (I) Possible Assumption of Contracts and Leases, (II) Fixing Cure Amounts, and (III) Deadline to Object Thereto [D.I. 748; 12/9/13]. *This matter has been resolved pursuant to the Third Amended Cure Schedule.*
- o) Objection of Ricoh USA, Inc. to Debtors' (I) Cure Schedule and (II) Confirmation of Plan [D.I. 749; 12/9/13]. *This matter has been resolved pursuant to the Notice of Filing of Amendment to Schedule of Rejected Contracts and Leases [Docket No. 730] (the "First Amended Rejection List") and the Notice of Filing of Amended Schedule of Rejected Contracts and Leases [Docket No. 789] (the "Second Amended Rejection List") and a statement will be made on the record.*
- p) Limited Objection of Bradshaw Consulting Services to Proposed Cure Amounts in Debtors' Notice of (I) Possible Assumption of Contracts and Leases, (II) Fixing Cure Amounts, and (III) Deadline to Object Thereto [D.I. 750; 12/9/13]. *This matter has been resolved through the Second Amended Cure Schedule.*
- q) GF Pima Owner 7, LLC's Objection to Debtor Rural Metro Operating Company, LLC's Notice of (I) Possible Assumption of Contracts and Leases, (II) Fixing Cure Amounts, and (III) Deadline to Object Thereto [D.I. 751; 12/9/13]. *This matter has been resolved pursuant the Second Amended Cure Schedule.*
- r) Objection of Commonwealth of Pennsylvania, Department of Revenue to the First Amended Joint Chapter 11 Plan of Reorganization [D.I. 763; 12/10/13]. *This matter has been resolved through language in the proposed order confirming the Plan.*
- s) Objection of First California Investments to Proposed Cure Amount as Set Forth in the Schedule of Assumed Contracts and Leases and Cure Schedule [D.I. 764; 12/10/13]. *This matter has been resolved through the First Amended Rejection Schedule.*
- t) Limited Objection of Brian Cates, Ray Iskander and Danny Sleiman to First Amended Joint Chapter 11 Plan of Reorganization for Rural/Metro Corporation and Its Affiliated Debtors [D.I. 771; 12/10/13]. *The parties are working towards resolving this matter and hope to have a resolution prior to the hearing.*
- u) Amended Limited Objection of BMO Harris Bank N.A. to Proposed Cure Amounts in Debtors' Notice of (I) Possible Assumption of Contracts and Leases, (II) Fixing of Cure Amounts, and (III) Deadline to Object Thereto (Doc. 702), Amendment to Schedule of Assumed Contracts and Leases and Cure Schedule (Doc. 735) and Second Amendment to Schedule of

Assumed Contracts and Leases and Cure Schedule (Doc. 769) [D.I. 777; 12/11/13]. *This matter has been resolved pursuant to the Third Amended Cure Schedule.*³

- v) Objection of Luge & Sons Development, Inc. to Notice of (I) Possible Assumption of Contracts and Leases, (II) Fixing of Cure Amounts, and (III) Deadline to Object Thereto [D.I. 778; 12/11/13]. *This matter has been resolved pursuant to the Third Amended Cure Schedule.*
- w) Commerce SWA, L.L.C.'s Objection to Cure Amount [D.I. 788; 12/11/13]. *The parties are working towards resolving this matter and hope to have a resolution prior to the hearing.*
- x) Informal Responses of Air Care International, SAIA Communications, National Fuel Resources, Queen Creek, CreekrIDGE Capital LLC, SAP America, Inc., ICIMS, Banner Health, First Watch, Iron Mountain, American International Group, Inc, Emergency Radio Service, Inc., and RBC Capital Markets. *These informal responses have been resolved through agreement by the parties that the information on the Initial Cure Schedule is correct, agreement by the parties that the matter is moot, amendments to the cure and/or rejection lists, language in the proposed order confirming the Plan, or a statement to be made on the record at the hearing.*
- y) Informal response of the City of Glendale. *This matter has been resolved by agreement of the parties and a statement will be made on the record.*
- z) Informal response from the United States Department of Justice. *This matter has been resolved through language in the proposed order confirming the Plan.*
- aa) Informal response from Emergency Medical Services. *The parties are working towards resolving this matter and hope to have a resolution prior to the hearing.*

Status: With respect to items (d), (e), (f), (g), (i), (j), (k), (m), (n), (o), (p) (q), (r), (s), (u), (v), (x), (y) and (z), these matters are resolved. With respect to items (h), (t), (w), and (aa), the parties are working towards resolving these matters and hope to have a resolution prior to the hearing. With respect to items (a), (b), (c), and (l), this matter is going forward.

³ This resolution also applies to the objection erroneously filed at Docket No. 5 in the jointly administered case of Rural/Metro of Indiana, L.P. (Case No. 13-11991).

9. Motion by Plaintiffs to File Under Seal the Lexington Insurance Policy [D.I. 665; 11/20/13]

Related Documents:

- a) Preliminary Objection [of Lisa McCall-Stowers] to First Amended Chapter 11 Plan of Reorganization for Rural/Metro Corporation and Its Affiliated Debtors [D.I. 613; 11/11/13]
- b) Redacted Lexington Insurance Policy [D.I. 724; 12/5/13]

Objection Deadline: December 6, 2013 at 4:00 p.m. (ET)

Objections/Responses Received:

- c) Informal Response from the Office of the United States Trustee

Status: This matter is going forward.

Dated: December 13, 2013
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

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