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*PROPOSED COUNSEL FOR THE DEBTOR
AND DEBTOR-IN-POSSESSION*

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

In re:)	Chapter 11
)	
RED RIVER WASTE SOLUTIONS, LP, ¹)	Case No. 21-42423 (ELM)
)	
Debtor.)	
)	

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON JANUARY 13, 2022 AT 9:30 A.M. (PREVAILING CENTRAL TIME),
BEFORE THE HONORABLE EDWARD L. MORRIS**

RESOLVED MATTER

1. Argonaut Insurance Company’s Emergency Motion to Compel Immediate Assumption or Rejection of Fort Wayne Bonded Contract [Docket No. 228]

Response Deadline: December 13, 2021

Responses Received: None.

¹ The last four digits of the Debtor’s taxpayer identification number are 8719. The Debtor’s principal office is located at 4004 East Hwy, 290 West, Dripping Springs, Texas 78620.

Related Documents:

- (a) Request for Expedited Hearing on Argonaut Insurance Company's Emergency Motion to Compel Assumption or Rejection of Fort Wayne Bonded Contract [Docket No. 229]
- (b) Notice of Hearing on Argonaut Insurance Company's Request for Expedited Hearing on Emergency Motion to Compel Immediate Assumption or Rejection of Fort Wayne Bonded Contract [Docket No. 235]
- (c) Amended Notice of Hearing on Argonaut Insurance Company's Request for Expedited Hearing on Emergency Motion to Compel Immediate Assumption or Rejection of Fort Wayne Bonded Contract [Docket No. 236]
- (d) Order Granting Argonaut Insurance Company's Request for Expedited Hearing on Argonaut Insurance Company's Emergency Motion to Compel Assumption or Rejection of Fort Wayne Bonded Contract [Docket No. 238]
- (e) Motion to Continue Hearing on Argonaut Insurance Company's Request for Expedited Hearing on Emergency Motion to Compel Immediate Assumption or Rejection of Fort Wayne Bonded Contract [Docket No. 241]
- (f) Order Continuing Hearing on Motion to Compel Assumption or Rejection [Docket No. 243]
- (g) Notice of Hearing Scheduled for December 23, 2021 at 9:30 a.m. (Prevailing Central Time) [Docket No. 244]
- (h) Debtor's Witness and Exhibit list for December 23, 2021 Hearing [Docket No. 249]
- (i) Argonaut Insurance Company's Witness and Exhibit List for Hearing on December 23, 2021 at 9:30 a.m. [Docket No. 250]
- (j) Notice of Passing of Hearing on Argonaut Insurance Company's Emergency Motion to Compel Immediate Assumption or Rejection of Fort Wayne Bonded Contract [Docket No. 253]

Status: This matter has been resolved by the parties.

CONTINUED MATTERS

- 2. Debtor's Emergency Motion for Interim and Final Orders (I) Authorizing the Debtor to Utilize Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Parties Pursuant to Sections 105, 361, 362, 363, and 507 of the Bankruptcy Code; and (III) Scheduling Final Hearing Pursuant to Bankruptcy Rule 4001(b) [Docket No. 12]

Response Deadline: December 13, 2021 at 4:00 p.m. (Prevailing Central Time);
extended to December 14, 2021 at 5:00 p.m. (Prevailing Central
Time) for the Official Committee of Unsecured Creditors and
MUFG Union Bank, N.A. as Lender and Administrative Agent

Responses Received:

- A. Limited Objection and Reservation of Rights with Regard to Proposed DIP Financing and Use of Cash Collateral [Docket No. 87]
- B. Limited Objection and Reservation of Rights with Regard to Proposed DIP Financing and Use of Cash Collateral [Docket No. 88]
- C. Preliminary Objection of the Official Committee of Unsecured Creditors to Debtor's Emergency Motion for Interim and Final Orders (I) Authorizing the Debtor to Utilize Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Parties Pursuant to Sections 105, 361, 362, 363, and 507 of the Bankruptcy Code; and (III) Scheduling Final Hearing Pursuant to Bankruptcy Rule 4001(b) [Docket No. 99]
- D. Objection of MUFG Union Bank, N.A. to Debtor's Proposed Third Interim Cash Collateral Order [Docket No. 161]
- E. Objection of the Official Committee of Unsecured Creditors to Debtor's Emergency Motion for Interim and Final Orders (I) Authorizing the Debtor to Utilize Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Parties Pursuant to Sections 105, 361, 362, 363, and 507 of the Bankruptcy Code; and (III) Scheduling A Final Hearing Pursuant to Bankruptcy Rule 4001(b) [Docket No. 226]
- F. Objection of MUFG Union Bank, N.A. to Debtor's Proposed Final Cash Collateral Order [Docket No. 230]

Related Documents:

- (a) Interim Order (I) Authorizing the Debtor to Use Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Parties Pursuant to Sections 105, 361, 362, 363, and 507 of the Bankruptcy Code; and (III) Scheduling Final Hearing Pursuant to Bankruptcy Rule 4001(b) [Docket No. 75]
- (b) Notice of Filing of: (1) Final Order (I) Approving the Form and Manner of Notifying Creditors of the Commencement of the Debtor's Chapter 11 Case and (II) Granting Related Relief; (2) Second Interim Order (I) Authorizing the Debtor to Use Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Parties Pursuant to Sections 105, 361, 362, 363, and 507 of the Bankruptcy Code; and (III) Scheduling Final Hearing Pursuant to Bankruptcy Rule 4004(b); and (3) Final Order (I) Authorizing Debtor to Obtain Post-Petition Financing

Pursuant to Section 364 of the Bankruptcy Code; and (II) Granting Weldon Smith Super-Priority Claims [Docket No. 104]

- (c) Second Interim Order (I) Authorizing the Debtor to Use Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Parties Pursuant to Sections 105, 361, 362, 363, and 507 of the Bankruptcy Code; and (III) Scheduling Final Hearing Pursuant to Bankruptcy Rule 4001(b) [Docket No. 115]
- (d) Notice of Filing of Debtor's Witness and Exhibit List for November 22, 2021 Hearing [Docket No. 152]
- (e) Notice of Filing of Third Interim Order (I) Authorizing the Debtor to Use Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Party Pursuant to Sections 105, 361, 362, 363, and 507 of the Bankruptcy Code; and (III) Scheduling Final Hearing Pursuant to Bankruptcy Rule 4001(b) [Docket No. 154]
- (f) Debtor's Amended Witness and Exhibit List for November 22, 2021 Hearing [Docket No. 163]
- (g) Notice of Filing of Revised (1) Third Interim Order (I) Authorizing the Debtor to Use Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Party Pursuant to Sections 105, 361, 362, 363, and 507 of the Bankruptcy Code; and (III) Scheduling Final Hearing Pursuant to Bankruptcy Rule 4001(b) and (2) Interim Order (I) Authorizing the Debtor to (A) Obtain Postpetition Senior Secured Superpriority Financing and (B) Use Cash Collateral, (II) Modifying the Automatic Stay, (III) Scheduling A Final Hearing, and (IV) Granting Related Relief [Docket No. 170]
- (h) Debtor's Second Amended Witness and Exhibit List for November 22, 2021 Hearing [Docket No. 171]
- (i) Notice of Hearing Scheduled for December 16, 2021 at 9:30 a.m. (Prevailing Central Time) [Docket No. 206]
- (j) Notice of Amended Objection Deadlines filed by MUFG Union Bank, N.A., as Lender and Administrative Agent [Docket No. 208]
- (k) Debtor's Request for Status Conference [Docket No. 211]
- (l) Notice of Status Conference Hearing Scheduled for December 9, 2021 at 8:30 a.m. (Prevailing Central Time) [Docket No. 212]
- (m) Order Granting Debtors' Request for Status Conference [Docket No. 213]
- (n) Notice of Cancellation of Status Conference Hearing Scheduled for December 9, 2021 at 8:30 a.m. (Prevailing Central Time) [Docket No. 214]

- (o) Notice of Filing of Proposed (1) Final Order (I) Authorizing the Debtor to Use Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Party Pursuant to Sections 105, 361, 362, 363, and 507 of the Bankruptcy Code and (2) Final Order (I) Authorizing the Debtor to (A) Obtain Postpetition Secured Financing and (B) Use Cash Collateral, (II) Modifying the Automatic Stay, and (III) Granting Related Relief [Docket No. 219]
- (p) Notice of Amended Objection Deadlines filed by MUFG Union Bank, N.A., as Lender and Administrative Agent [Docket No. 224]
- (q) Debtor's Witness and Exhibit List for December 16, 2021 Hearing [Docket No. 225]
- (r) Notice of Hearing Scheduled for December 28, 2021 at 9:30 a.m. (Prevailing Central Time) [Docket No. 237]
- (s) Debtor's Witness and Exhibit List for December 28, 2021 Hearing [Docket No. 260]
- (t) Notice of Adjournment of Hearing Scheduled for December 28, 2021 [Docket No. 261]
- (u) Debtor's Witness and Exhibit List for January 4, 2022 Hearing [Docket No. 265]
- (v) Notice of Hearing Scheduled for January 13, 2022 at 9:30 a.m. (Prevailing Central Time) [Docket No. 272]
- (w) Notice of Filing of Debtor's Witness and Exhibit List for Hearing Scheduled for January 13, 2022 at 9:30 a.m. (Prevailing Central Time) [Docket No. 276]

Status: This matter is continued to the hearing scheduled for January 25, 2022 at 1:30 p.m. (Prevailing Central Time), subject to Court approval.

3. Debtor's Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Obtain Postpetition Senior Secured Superpriority Financing and (B) Use Cash Collateral, (II) Modifying the Automatic Stay, (III) Scheduling A Final Hearing, and (IV) Granting Related Relief [Docket No. 131]

Response Deadline: December 13, 2021 at 4:00 p.m. (Prevailing Central Time);
extended to December 14, 2021 at 5:00 p.m. (Prevailing Central Time) for the Official Committee of Unsecured Creditors and MUFG Union Bank, N.A. as Lender and Administrative Agent

Responses Received:

- A. Limited Objection of the City of Fort Wayne, Indiana to Debtor's Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Obtain Postpetition Senior Secured Superpriority Financing and (B) Use Cash

Collateral, (II) Modifying the Automatic Stay, (III) Scheduling A Final Hearing, and (IV) Granting Related Relief [Docket No. 149]

- B. Objection of MUFG Union Bank, N.A. to Debtor's Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Obtain Postpetition Senior Secured Superpriority Financing and (B) Use Cash Collateral, (II) Modifying the Automatic Stay, (III) Scheduling A Final Hearing, and (IV) Granting Related Relief [Docket No. 162]
- C. Preliminary Objection of the Official Committee of Unsecured Creditors to Debtor's Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Obtain Postpetition Senior Secured Superpriority Financing and (B) Use Cash Collateral, (II) Modifying the Automatic Stay, (III) Scheduling A Final Hearing, and (IV) Granting Related Relief [Docket No. 173]
- D. Objection of the Official Committee of Unsecured Creditors to Debtor's Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Obtain Postpetition Senior Secured Superpriority Financing and (B) Use Cash Collateral, (II) Modifying the Automatic Stay, (III) Scheduling Final Hearing and (IV) Granting Related Relief [Docket No. 227]
- E. Objection of MUFG Union Bank, N.A. to Debtor's Proposed Final Order (I) Authorizing the Debtor to (A) Obtain Postpetition Senior Secured Superpriority Financing and (B) Use Cash Collateral [Docket No. 231]

Related Documents:

- (a) Declaration of James Calandra in Support of Debtor's Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Obtain Postpetition Senior Secured Superpriority Financing and (B) Use Cash Collateral, (II) Modifying the Automatic Stay, (III) Scheduling A Final Hearing, and (IV) Granting Related Relief [Docket No. 132]
- (b) Notice of Filing of Order (I) Authorizing the Debtor to Amend Corporate Card Program Agreement and (II) Granting Related Relief [Docket No. 133]
- (c) Order Granting Motion for Emergency Hearing on Debtor's Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Obtain Postpetition Senior Secured Superpriority Financing and (B) Use Cash Collateral, (II) Modifying the Automatic Stay, (III) Scheduling A Final Hearing, and (IV) Granting Related Relief [Docket No. 137]
- (d) Notice of Hearing on November 22, 2021 at 11:00 a.m. (Prevailing Central Time) [Docket No. 139]
- (e) Notice of Filing of Debtor's Witness and Exhibit List for November 22, 2021 Hearing [Docket No. 152]

- (f) Notice of Filing of Revised Exhibit A and Exhibit B to the DIP Credit Agreement Regarding Debtor's Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Obtain Postpetition Senior Secured Superpriority Financing and (B) Use Cash Collateral, (II) Modifying the Automatic Stay, (III) Scheduling A Final Hearing, and (V) Granting Related Relief [Docket No. 160]
- (g) Debtor's Amended Witness and Exhibit List for November 22, 2021 Hearing [Docket No. 163]
- (h) Notice of Filing of Revised (1) Third Interim Order (I) Authorizing the Debtor to Use Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Party Pursuant to Sections 105, 361, 362, 363, and 507 of the Bankruptcy Code; and (III) Scheduling Final Hearing Pursuant to Bankruptcy Rule 4001(b) and (2) Interim Order (I) Authorizing the Debtor to (A) Obtain Postpetition Senior Secured Superpriority Financing and (B) Use Cash Collateral, (II) Modifying the Automatic Stay, (III) Scheduling A Final Hearing, and (IV) Granting Related Relief [Docket No. 170]
- (i) Debtor's Second Amended Witness and Exhibit List for November 22, 2021 Hearing [Docket No. 171]
- (j) Notice of Hearing Scheduled for December 16, 2021 at 9:30 a.m. (Prevailing Central Time) [Docket No. 206]
- (k) Notice of Amended Objection Deadlines filed by MUFG Union Bank, N.A., as Lender and Administrative Agent [Docket No. 208]
- (l) Debtor's Request for Status Conference [Docket No. 211]
- (m) Notice of Status Conference Hearing Scheduled for December 9, 2021 at 8:30 a.m. (Prevailing Central Time) [Docket No. 212]
- (n) Order Granting Debtors' Request for Status Conference [Docket No. 213]
- (o) Notice of Cancellation of Status Conference Hearing Scheduled for December 9, 2021 at 8:30 a.m. (Prevailing Central Time) [Docket No. 214]
- (p) Notice of Filing of Proposed (1) Final Order (I) Authorizing the Debtor to Use Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Party Pursuant to Sections 105, 361, 362, 363, and 507 of the Bankruptcy Code and (2) Final Order (I) Authorizing the Debtor to (A) Obtain Postpetition Secured Financing and (B) Use Cash Collateral, (II) Modifying the Automatic Stay, and (III) Granting Related Relief [Docket No. 219]
- (q) Notice of Amended Objection Deadlines filed by MUFG Union Bank, N.A., as Lender and Administrative Agent [Docket No. 224]

- (r) Debtor's Witness and Exhibit List for December 16, 2021 Hearing [Docket No. 225]
- (s) Notice of Hearing Scheduled for December 28, 2021 at 9:30 a.m. (Prevailing Central Time) [Docket No. 237]
- (t) Debtor's Witness and Exhibit List for December 28, 2021 Hearing [Docket No. 260]
- (u) Notice of Adjournment of Hearing Scheduled for December 28, 2021 [Docket No. 261]
- (v) Debtor's Witness and Exhibit List for January 4, 2022 Hearing [Docket No. 265]
- (w) Notice of Hearing Scheduled for January 13, 2022 at 9:30 a.m. (Prevailing Central Time) [Docket No. 272]
- (x) Notice of Filing of Debtor's Witness and Exhibit List for Hearing Scheduled for January 13, 2022 at 9:30 a.m. (Prevailing Central Time) [Docket No. 276]

Status: This matter is continued to the hearing scheduled for January 25, 2022 at 1:30 p.m. (Prevailing Central Time), subject to Court approval.

UNCONTESTED MATTER WITH CERTIFICATE OF NO OBJECTION

4. Debtor's Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Docket No. 186]

Response Deadline: December 5, 2021 at 4:00 p.m. (Prevailing Central Time);
extended to December 14, 2021 at 5:00 p.m. (Prevailing Central Time) for MUFG Union Bank, N.A. as Lender and Administrative Agent

Responses Received: None.

Related Documents:

- (a) Debtor's Witness and Exhibit List for December 16, 2021 Hearing [Docket No. 225]
- (b) Notice of Hearing Scheduled for December 28, 2021 at 9:30 a.m. (Prevailing Central Time) [Docket No. 237]
- (c) Debtor's Witness and Exhibit List for December 28, 2021 Hearing [Docket No. 260]
- (d) Notice of Adjournment of Hearing Scheduled for December 28, 2021 [Docket No. 261]

- (e) Debtor's Witness and Exhibit List for January 4, 2022 Hearing [Docket No. 265]
- (f) Notice of Hearing Scheduled for January 7, 2022 at 9:30 a.m. (Prevailing Central Time) [Docket No. 268]
- (g) Notice of Filing of Debtor's Witness and Exhibit List for Hearing Scheduled for January 7, 2022 at 9:30 a.m. (Prevailing Central Time) [Docket No. 270]
- (h) Notice of Hearing Scheduled for January 13, 2022 at 9:30 a.m. (Prevailing Central Time) [Docket No. 272]
- (i) Notice of Filing of Debtor's Witness and Exhibit List for Hearing Scheduled for January 13, 2022 at 9:30 a.m. (Prevailing Central Time) [Docket No. 276]

Status: A Certificate of No Objection will be filed with the Court following the hearing. This matter will not be going forward unless otherwise directed by the Court.

MATTERS GOING FORWARD

- 5. Debtor's Amended Application of Entry of Order Authorizing the Employment of McDermott Will & Emery LLP as Counsel to the Debtor Effective as of the Petition Date [Docket No. 142]

Response Deadline: December 5, 2021 at 4:00 p.m. (Prevailing Central Time);
extended to December 14, 2021 at 5:00 p.m. (Prevailing Central Time) for MUFG Union Bank, N.A. as Lender and Administrative Agent

Responses Received:

- A. Combined Reservation of Rights of the Official Committee of Unsecured Creditors Regarding Debtor's (1) Application for an Order Authorizing Debtor to (I) Employ and Retain CRS Capstone Partners LLC to Provide A Chief Restructuring Officer and Additional Personnel and (II) Designate James Calandra as the Chief Restructuring Officer of the Debtor as of the Petition Date; and (2) Amended Application for Entry of an Order Authorizing the Employment of McDermott Will & Emery LLP as Counsel to the Debtor Effective as of the Petition Date [Docket No. 205]
- B. Objection of MUFG Union Bank, N.A. to Debtor's Amended Application for Entry of an Order Authorizing the Employment of McDermott Will & Emery LLP [Docket No. 234]

Related Documents:

- (a) Notice of Amended Objection Deadlines filed by MUFG Union Bank, N.A., as Lender and Administrative Agent [Docket No. 208]

- (b) Notice of Amended Objection Deadlines filed by MUFG Union Bank, N.A., as Lender and Administrative Agent [Docket No. 224]
- (c) Debtor's Witness and Exhibit List for December 16, 2021 Hearing [Docket No. 225]
- (d) Notice of Hearing Scheduled for December 28, 2021 at 9:30 a.m. (Prevailing Central Time) [Docket No. 237]
- (e) Debtor's Witness and Exhibit List for December 28, 2021 Hearing [Docket No. 260]
- (f) Notice of Adjournment of Hearing Scheduled for December 28, 2021 [Docket No. 261]
- (g) Debtor's Witness and Exhibit List for January 4, 2022 Hearing [Docket No. 265]
- (h) Notice of Hearing Scheduled for January 7, 2022 at 9:30 a.m. (Prevailing Central Time) [Docket No. 268]
- (i) Notice of Filing of Debtor's Witness and Exhibit List for Hearing Scheduled for January 7, 2022 at 9:30 a.m. (Prevailing Central Time) [Docket No. 270]
- (j) Notice of Hearing Scheduled for January 13, 2022 at 9:30 a.m. (Prevailing Central Time) [Docket No. 272]
- (k) Notice of Filing of Debtor's Witness and Exhibit List for Hearing Scheduled for January 13, 2022 at 9:30 a.m. (Prevailing Central Time) [Docket No. 276]

Status: This matter is going forward.

- 6. Debtor's Application for an Order Authorizing Debtor to (I) Employ and Retain CRS Capstone Partners LLC to Provide A Chief Restructuring Officer and Additional Personnel and (II) Designate James Calandra as the Chief Restructuring Officer of the Debtor as of the Petition Date [Docket No. 143]

Response Deadline: December 5, 2021 at 4:00 p.m. (Prevailing Central Time);
extended to December 14, 2021 at 5:00 p.m. (Prevailing Central Time) for MUFG Union Bank, N.A. as Lender and Administrative Agent

Responses Received:

- A. Combined Reservation of Rights of the Official Committee of Unsecured Creditors Regarding Debtor's (1) Application for an Order Authorizing Debtor to (I) Employ and Retain CRS Capstone Partners LLC to Provide A Chief Restructuring Officer and Additional Personnel and (II) Designate James Calandra as the Chief Restructuring Officer of the Debtor as of the Petition Date; and (2) Amended

Application for Entry of an Order Authorizing the Employment of McDermott Will & Emery LLP as Counsel to the Debtor Effective as of the Petition Date [Docket No. 205]

- B. Objection of MUFG Union Bank, N.A. to Debtor's Application for Order Authorizing Debtor to (I) Employ and Retain CRS Capstone Partners LLC to Provide A Chief Restructuring Officer and Additional Personnel and (II) Designate James Calandra as the Chief Restructuring Officer of the Debtor as of the Petition Date [Docket No. 233]

Related Documents:

- (a) Notice of Amended Objection Deadlines filed by MUFG Union Bank, N.A., as Lender and Administrative Agent [Docket No. 208]
- (b) Notice of Amended Objection Deadlines filed by MUFG Union Bank, N.A., as Lender and Administrative Agent [Docket No. 224]
- (c) Debtor's Witness and Exhibit List for December 16, 2021 Hearing [Docket No. 225]
- (d) Notice of Hearing Scheduled for December 28, 2021 at 9:30 a.m. (Prevailing Central Time) [Docket No. 237]
- (e) Notice of Filing of Proposed Revised Order Authorizing Debtor to (I) Employ and Retain CRS Capstone Partners, LLC to Provide A Chief Restructuring Officer and Additional Personnel and (II) Designate James Calandra as the Chief Restructuring Officer of the Debtor as of the Petition Date [Docket No. 257]
- (f) Debtor's Witness and Exhibit List for December 28, 2021 Hearing [Docket No. 260]
- (g) Notice of Adjournment of Hearing Scheduled for December 28, 2021 [Docket No. 261]
- (h) Debtor's Witness and Exhibit List for January 4, 2022 Hearing [Docket No. 265]
- (i) Notice of Hearing Scheduled for January 7, 2022 at 9:30 a.m. (Prevailing Central Time) [Docket No. 268]
- (j) Notice of Filing of Debtor's Witness and Exhibit List for Hearing Scheduled for January 7, 2022 at 9:30 a.m. (Prevailing Central Time) [Docket No. 270]
- (k) Notice of Hearing Scheduled for January 13, 2022 at 9:30 a.m. (Prevailing Central Time) [Docket No. 272]

- (l) Notice of Filing of Debtor's Witness and Exhibit List for Hearing Scheduled for January 13, 2022 at 9:30 a.m. (Prevailing Central Time) [Docket No. 276]

Status: This matter is going forward.

7. Debtor's Application for Entry of an Order Authorizing the Employment and Retention of Schiffer Hicks Johnson PLLC as Special Counsel to the Debtor Effective as of the Petition Date [Docket No. 145]

Response Deadline: December 5, 2021 at 4:00 p.m. (Prevailing Central Time);
extended to December 14, 2021 at 5:00 p.m. (Prevailing Central Time) for MUFG Union Bank, N.A. as Lender and Administrative Agent

Responses Received:

- A. Objection of MUFG Union Bank, N.A. to Debtor's Application for Entry of an Order Authorizing the Employment and Retention of Schiffer Hicks Johnson PLLC as Special Counsel to the Debtor as of the Petition Date [Docket No. 232]

Related Documents:

- (a) Notice of Amended Objection Deadlines filed by MUFG Union Bank, N.A., as Lender and Administrative Agent [Docket No. 208]
- (b) Notice of Amended Objection Deadlines filed by MUFG Union Bank, N.A., as Lender and Administrative Agent [Docket No. 224]
- (c) Debtor's Witness and Exhibit List for December 16, 2021 Hearing [Docket No. 225]
- (d) Notice of Hearing Scheduled for December 28, 2021 at 9:30 a.m. (Prevailing Central Time) [Docket No. 237]
- (e) Declaration of Marc S. Tabolsky in Support of Debtor's Application for Entry of an Order Authorizing the Employment and Retention of Schiffer Hicks Johnson as Special Counsel to the Debtor Effective as of the Petition Date [Docket No. 259]
- (f) Debtor's Witness and Exhibit List for December 28, 2021 Hearing [Docket No. 260]
- (g) Notice of Adjournment of Hearing Scheduled for December 28, 2021 [Docket No. 261]
- (h) Debtor's Witness and Exhibit List for January 4, 2022 Hearing [Docket No. 265]

- (i) Notice of Hearing Scheduled for January 7, 2022 at 9:30 a.m. (Prevailing Central Time) [Docket No. 268]
- (j) Notice of Filing of Debtor's Witness and Exhibit List for Hearing Scheduled for January 7, 2022 at 9:30 a.m. (Prevailing Central Time) [Docket No. 270]
- (k) Notice of Hearing Scheduled for January 13, 2022 at 9:30 a.m. (Prevailing Central Time) [Docket No. 272]
- (l) Notice of Filing of Debtor's Witness and Exhibit List for Hearing Scheduled for January 13, 2022 at 9:30 a.m. (Prevailing Central Time) [Docket No. 276]

Status: This matter is going forward.

Respectfully submitted this 12th day of January 2022.

Dated: January 12, 2022

/s/ Marcus A. Helt

Marcus A. Helt, Esq. (Texas Bar #24052187)

Jane A. Gerber, Esq. (Texas Bar #24092416)

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*PROPOSED COUNSEL FOR THE DEBTOR
AND DEBTOR-IN-POSSESSION*

Certificate of Service

I certify that on January 12, 2022, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas.

/s/ Marcus A. Helt

Marcus A. Helt