

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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*Proposed Counsel to the Debtor and
Debtor-in-Possession*

In Re:

PRESERSE CORPORATION,

Debtor.¹

Chapter 11

Case No. 24-18921

Judge: Hon. Michael B. Kaplan

**NOTICE OF AGENDA OF MATTERS SCHEDULED
TO BE HEARD ON SEPTEMBER 12, 2024 AT 9:00 A.M. (ET)**

To: All Parties Receiving Electronic Notification of filing via the Court's ECF System

PLEASE TAKE NOTICE that the following matters are currently scheduled to be heard on **September 12, at 9:00 a.m. (prevailing Eastern Time)** before the Honorable Michael B. Kaplan, United States Bankruptcy Court for the District of New Jersey, 402 East State Street, Courtroom #8, Trenton, NJ 08608. **The first day hearing will be conducted by the Court in hybrid format, both in-person and via Zoom. For instructions on how to participate via**

¹ The Debtor in this chapter 11 case, along with the last four digits of the Debtor's tax identification number, is Presperse Corporation (7527). The mailing address for the Debtor for purposes of this chapter 11 case is 19 Schoolhouse Rd, Somerset, NJ 08873.

Zoom, please see this link on the New Jersey Bankruptcy Court website
<https://www.njb.uscourts.gov/content/honorable-michael-b-kaplan>.

I. MATTERS GOING FORWARD

1. Debtor's Application for Entry of an Order (I) Authorizing the Appointment of Kroll Restructuring Administration LLC as Claims And Noticing Agent Effective as of the Petition Date and (II) Granting Related Relief [Docket No. 3]

Related Documents:

- a. Declaration of Mehul Shah, Chief Financial Officer of the Debtor, in Support of Chapter 11 Petition and First Day Pleadings [Docket No. 6]
- b. Application for Expedited Consideration of First Day Matters [Docket No. 12]
- c. Order Regarding Application for Expedited Consideration of First Day Matters [Docket No. 15]

Status: This matter is going forward with permission of the Court. The proposed order incorporates comments from the pre-petition Talc Claimants' Committee, pre-petition Future Claimants' Representative, and the U.S. Trustee. The Debtor expects this matter to proceed on an uncontested basis.

2. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Filing of a List of (A) the Law Firms Representing the Largest Numbers of Talc Asbestos Plaintiffs Asserting Claims Against the Debtor and (B) the Unsecured Creditors of the Debtor, (II) Authorizing the Listing of Addresses of Counsel for Talc Asbestos Claimants in Creditor Matrix in Lieu of Claimants' Addresses, (III) Approving Notice Procedures for Such Claimants, and (IV) Granting Related Relief [Docket No. 5]

Related Documents:

- a. Declaration of Mehul Shah, Chief Financial Officer of the Debtor, in Support of Chapter 11 Petition and First Day Pleadings [Docket No. 6]
- b. Application for Expedited Consideration of First Day Matters [Docket No. 12]
- c. Order Regarding Application for Expedited Consideration of First Day Matters [Docket No. 15]
- d. Supplement to Motion Establishing Noticing Procedures [Docket No. 17]

Status: This matter is going forward with permission of the Court. The proposed order incorporates comments from the pre-petition Talc Claimants' Committee, pre-petition Future Claimants' Representative, and the U.S. Trustee. The Debtor understands that the U.S. Trustee may raise certain issues or limited objections with respect to the proposed interim order at the hearing, and the Debtor will be prepared to address any such matters at the first day hearing.

3. Debtor's Motion for Interim and Final Orders Pursuant to 11 U.S.C. §§ 105(a), 363(b) and 507(A)(4) and (A)(5) Authorizing the Debtor to Pay Prepetition Wages and Salaries and Related Obligations and Taxes and (II) Directing All Banks to Honor Checks and Transfers for Payment of Prepetition Employee Obligations [Docket No. 7]

Related Documents:

- a. Declaration of Mehul Shah, Chief Financial Officer of the Debtor, in Support of Chapter 11 Petition and First Day Pleadings [Docket No. 6]
- b. Application for Expedited Consideration of First Day Matters [Docket No. 12]
- c. Order Regarding Application for Expedited Consideration of First Day Matters [Docket No. 15]

Status: This matter is going forward with permission of the Court. The proposed order incorporates comments from the pre-petition Talc Claimants' Committee, pre-petition Future Claimants' Representative, and the U.S. Trustee. The Debtor expects this matter to proceed on an uncontested basis.

4. Debtor's Motion for Interim and Final Orders (I) Authorizing the Debtor to Continue and Maintain Its Existing Cash Management System, Bank Accounts and Business Forms, (II) Modifying the Investment Guidelines, and (III) Granting Related Relief [Docket No. 8]

Related Documents:

- a. Declaration of Mehul Shah, Chief Financial Officer of the Debtor, in Support of Chapter 11 Petition and First Day Pleadings [Docket No. 6]
- b. Application for Expedited Consideration of First Day Matters [Docket No. 12]
- c. Order Regarding Application for Expedited Consideration of First Day Matters [Docket No. 15]

Status: This matter is going forward with permission of the Court. The proposed order incorporates comments from the pre-petition Talc Claimants' Committee, pre-petition

Future Claimants' Representative, and the U.S. Trustee. The Debtor understands that the U.S. Trustee may raise certain issues or limited objections with respect to the proposed interim order at the hearing, and the Debtor will be prepared to address any such matters at the first day hearing.

5. Debtor's Motion for Entry of Interim and Final Orders Pursuant To 11 U.S.C. §§ 105(a), 363(b) and 503(B)(9) and Fed. R. Bankr. P. 4001, 6003 and, 6004 (I) Authorizing the Debtor to Pay Prepetition Claims of Certain General Unsecured Creditors in the Ordinary Course of Business and (II) Granting Related Relief [Docket No. 9]

Related Documents:

- a. Declaration of Mehul Shah, Chief Financial Officer of the Debtor, in Support of Chapter 11 Petition and First Day Pleadings [Docket No. 6]
- b. Application for Expedited Consideration of First Day Matters [Docket No. 12]
- c. Order Regarding Application for Expedited Consideration of First Day Matters [Docket No. 15]

Status: This matter is going forward with permission of the Court. The proposed order incorporates comments from the pre-petition Talc Claimants' Committee, pre-petition Future Claimants' Representative, and the U.S. Trustee. The Debtor understands that the U.S. Trustee may raise certain issues or limited objections with respect to the proposed interim order at the hearing, and the Debtor will be prepared to address any such matters at the first day hearing.

6. Debtor's Motion for Entry of an Order (I) Authorizing the Debtor to Continue to Operate and Perform Under the Unsecured SCOA Financing Facility, (II) Obtain Unsecured Post-Petition Financing Pursuant to Section 364 of the Bankruptcy Code, and (III) Granting Related Relief [Docket No. 10]

Related Documents:

- a. Declaration of Mehul Shah, Chief Financial Officer of the Debtor, in Support of Chapter 11 Petition and First Day Pleadings [Docket No. 6]
- b. Application for Expedited Consideration of First Day Matters [Docket No. 12]
- c. Order Regarding Application for Expedited Consideration of First Day Matters [Docket No. 15]
- d. Declaration of Mark D. Podgainy in Support of Debtor's DIP Motion [Docket No. 10-4]

Status: This matter is going forward with permission of the Court. The proposed order incorporates comments from the pre-petition Talc Claimants' Committee, pre-petition Future Claimants' Representative, and the U.S. Trustee. The Debtor expects this matter to proceed on an uncontested basis.

7. Application for Designation as a Chapter 11 Complex Case [Docket No. 11].

Related Documents:

- a. Declaration of Mehul Shah, Chief Financial Officer of the Debtor, in Support of Chapter 11 Petition and First Day Pleadings [Docket No. 6]
- b. Application for Expedited Consideration of First Day Matters [Docket No. 12]
- c. Order Regarding Application for Expedited Consideration of First Day Matters [Docket No. 15]

Status: This matter is going forward with permission of the Court. The proposed order incorporates comments from the pre-petition Talc Claimants' Committee, pre-petition Future Claimants' Representative, and the U.S. Trustee. The Debtor expects this matter to proceed on an uncontested basis.

II. STATUS CONFERENCE²

8. Joint Prenegotiated Plan of Reorganization of Presperse Corporation Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 13]

Related Documents:

- a. Declaration of Mehul Shah, Chief Financial Officer of the Debtor, in Support of Chapter 11 Petition and First Day Pleadings [Docket No. 6]

Status: This matter is going forward solely as a status conference

9. Disclosure Statement for the Joint Prenegotiated Plan of Reorganization of Presperse Corporation Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 14]

² The Debtor intends to file (i) a motion for conditional approval of the Disclosure Statement and the establishment of Plan voting and solicitation procedures, and (ii) a proof of claim bar date motion for non-talc related claims prior to the first day hearing, both of which the Debtor intends to address for the Court as a status conference. The Debtor will discuss the possibility of scheduling a hearing on these motions on or about October 1, 2024 at 10:00 a.m. ET. The Debtor will file an amended agenda, if necessary, prior to the hearing in connection with the filing of the same.

Related Documents:

- a. Declaration of Mehul Shah, Chief Financial Officer of the Debtor, in Support of Chapter 11 Petition and First Day Pleadings [Docket No. 6]

Status: This matter is going forward solely as a status conference

10. Debtor's Motion for Entry of an Order Appointing Heather Barlow as Legal Representative for Future Talc Personal Injury Claimants *Nunc Pro Tunc* to the Petition Date [Docket No. 20]

Related Documents:

- a. Declaration of Mehul Shah, Chief Financial Officer of the Debtor, in Support of Chapter 11 Petition and First Day Pleadings [Docket No. 6]

Status: This matter is going forward solely as a status conference. This matter is scheduled for hearing on October 1, 2024 at 10:00 a.m. ET.

Dated: September 11, 2024

Respectfully submitted,

DUANE MORRIS LLP

/s/ Morris S. Bauer

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