Matthew A. Feldman Paul V. Shalhoub Robin Spigel Debra C. McElligott WILLKIE FARR & GALLAGHER LLP 787 Seventh Avenue New York, New York 10019 Telephone: (212) 728-8000 Facsimile: (212) 728-8111

Proposed Counsel for the Debtors and Debtors in Possession

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

Chapter 11 In re:

Case No. 17-10659 (JLG) SquareTwo Financial Services

Corporation, et al.,¹

(Joint Administration Pending)

Debtors.

NOTICE OF AGENDA OF MATTERS SCHEDULED FOR FIRST DAY HEARING ON MARCH 21, 2017 AT 3:00 P.M. (EASTERN TIME)

Location of Hearing: United States Bankruptcy Court

> Southern District of New York One Bowling Green, Room 601 New York, New York 10004

The Debtors in these chapter 11 cases and the last four digits of each Debtor's federal taxpayer

RELATED PLEADINGS A.

Voluntary Petitions for SquareTwo Financial Services Corporation and certain of 1. its affiliates (collectively, the "Debtors").

identification number and/or Canadian equivalent are as follows: Astrum Financial, LLC (2265); Autus, LLC (2736); CA Internet Marketing, LLC (7434); CACH, LLC d/b/a Fresh View Funding (6162); CACV of Colorado, LLC (3409); CACV of New Jersey, LLC (3499); Candeo, LLC (2809); CCL Financial Inc. (7548); Collect Air, LLC (7987); Collect America of Canada, LLC (7137); Healthcare Funding Solutions, LLC (2985); Metropolitan Legal Administration Services, Inc. (6811); Orsa, LLC (2864); Preferred Credit Resources Limited (0637); ReFinance America, Ltd. (4359); SquareTwo Financial Canada Corporation (EIN: 1034; BN: 0174); SquareTwo Financial Corporation (1849); and SquareTwo Financial Services Corporation d/b/a Fresh View Solutions (5554). The Debtors' executive headquarters are located at 6300 South Syracuse Way, Suite 300, Centennial, CO 80111.

2. Declaration of J.B. Richardson, Jr. in Support of Chapter 11 Petitions and First Day Pleadings [Docket No. 3].

B. <u>FIRST DAY PLEADINGS</u>

- 3. Debtors' Motion for Order Authorizing Joint Administration Pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure [Docket No. 2].
- 4. Debtors' Application for Appointment of Prime Clerk LLC as Claims and Noticing Agent [Docket No. 4].
- 5. Debtors' Motion for Order (A) Extending Deadline for Debtors to File Their Schedules of Assets and Liabilities and Statements of Financial Affairs; and (B) Permanently Waiving Same Upon Confirmation of Debtors' Prepackaged Plan [Docket No. 5].
- 6. Debtors' Motion for Interim and Final Orders: (A) Authorizing Debtors to Pay (I) Prepetition Employee Wages, Salaries and Other Compensation, (II) Prepetition Employee Business Expenses, and (III) Other Miscellaneous Employee Expenses and Employee Benefits; and (B) Granting Related Relief [Docket No. 10].
- 7. Debtors' Motion for Interim and Final Orders: (A) Authorizing Payment of Local Court Costs and Recording and Garnishment Fees; and (B) Granting Related Relief [Docket No. 15].
- 8. Debtors' Motion for Interim and Final Orders: (A) Authorizing Payment of Certain Sales, Use and Other Taxes, and Regulatory and Other Fees; and (B) Granting Related Relief [Docket No. 12].
- 9. Debtors' Motion for Interim and Final Orders Authorizing: (A) Continued Use of the Debtors' Cash Management System and Procedures; (B) Maintenance and Continued Use of Existing Bank Accounts; (C) Modification of Certain U.S. Trustee Operating Guidelines Relating to Bank Accounts; (D) Modification of the Requirements of Section 345(b) of the Bankruptcy Code on an Interim and Final Basis; and (E) Continuation of Intercompany Transactions and Accordance of Administrative Expense Status to Intercompany Claims [Docket No. 9].
- 10. Debtors' Motion for Entry of an Order Authorizing SquareTwo Financial Corporation to Act as Foreign Representative on Behalf of the Debtors' Estates [Docket No. 13].
- 11. Canadian Debtors' Motion for Interim and Final Orders Authorizing Payment of Prepetition Canadian General Unsecured Claims in the Ordinary Course of Business and Granting Related Relief [Docket No. 14].
- 12. Debtors' Motion for Interim and Final Orders: (A) Prohibiting Utility Companies from Altering or Discontinuing Services; (B) Providing Utility Companies with

Adequate Assurance of Payment; and (C) Establishing Procedures for Resolving Requests for Additional Assurance of Payment [Docket No. 11].

13. Debtors' Motion: (I) for Order (A) Scheduling Combined Hearing on Adequacy of Disclosure Statement and Confirmation of Prepackaged Plan, (B) Establishing Procedures for Objecting to Disclosure Statement and Prepackaged Plan, (C) Approving Form and Manner of Notice of Combined Hearing, (D) Waiving Requirement for Filing List of Creditors and Equity Holders, (E) Authorizing Debtors to File Consolidated List of Creditors, (F) Postponing or Waiving Section 341(a) Meeting, and (G) Granting Related Relief; and (II) For Order (A) Approving Prepetition Solicitation Procedures, (B) Approving Adequacy of Disclosure Statement, and (C) Confirming Prepackaged Chapter 11 Plan [Docket No. 6].

Related Documents:

Joint Prepackaged Chapter 11 Plan for SquareTwo Financial Services Corporation and Its Affiliated Debtors [Docket No. 20].

Disclosure Statement for Joint Prepackaged Chapter 11 Plan for SquareTwo Financial Services Corporation and Its Affiliated Debtors [Docket No. 21].

Declaration of James Daloia of Prime Clerk LLC Regarding Solicitation of Votes and Tabulation of Ballots Cast on the Joint Prepackaged Chapter 11 Plan for SquareTwo Financial Services Corporation and Its Affiliated Debtors [Docket No. 22].

14. Debtors' Motion for Interim and Final Orders Authorizing Debtors to:
(A) Continue Using Their Existing Collections System; (B) Employ and Retain
Certain Related Law Firms in the Ordinary Course of Business Nunc Pro Tunc to
the Petition Date; and (C) Granting Related Relief [Docket No. 16].

Related Documents:

Declaration in Support of Employment and Retention of Brown Law, PLLC as a Collections Firm [Docket No. 23].

Declaration in Support of Employment and Retention of William C. Grossman Law, PLLC as a Collections Firm [Docket No. 24].

Declaration in Support of Employment and Retention of D. Michael Dendy, A Professional Law Corporation as a Collections Firm [Docket No. 25].

Declaration in Support of Employment and Retention of Scott Lowery Law Office, P.C. as a Collections Firm [Docket No. 26].

Declaration in Support of Employment and Retention of Daniels, Norelli, Scully & Cecere, P.C. as a Collections Firm [Docket No. 27].

Declaration in Support of Employment and Retention of Neuheisel Law Firm, P.C. as a Collections Firm [Docket No. 28].

Declaration in Support of Employment and Retention of Ed Overcash, LLC as a Collections Firm [Docket No. 29].

Declaration in Support of Employment and Retention of Mandarich Law Group, LLP as a Collections Firm [Docket No. 30].

Declaration in Support of Employment and Retention of Enerson Law, LLC as a Collections Firm [Docket No. 31].

Declaration in Support of Employment and Retention of Federated Law Group, PLLC as a Collections Firm [Docket No. 32].

Declaration in Support of Employment and Retention of Law Office of Joe Pezzuto, LLC as a Collections Firm [Docket No. 33].

Declaration in Support of Employment and Retention of J.A. Cambece Law Office, P.C. as a Collections Firm [Docket No. 34].

Declaration in Support of Employment and Retention of Taylor Law, PLLC as a Collections Firm [Docket No. 36].

15. Debtors' Motion for Interim and Final Orders: (I) Approving Postpetition Financing; (II) Authorizing Use of Cash Collateral; (III) Granting Adequate Protection to Prepetition Secured Parties; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [Docket No. 7].

Related Documents:

Declaration of John A. McKenna, Jr. in Support of Debtors' Motion for Interim and Final Orders: (I) Approving Postpetition Financing; (II) Authorizing Use of Cash Collateral; (III) Granting Adequate Protection to Prepetition Secured Parties; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [Docket No. 8].

Status: The above matters will be going forward at the Hearing.

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Dated: March 20, 2017 New York, New York

WILLKIE FARR & GALLAGHER LLP Proposed Counsel for the Debtors and Debtors in Possession

By: /s/ Matthew A. Feldman
Matthew A. Feldman

Matthew A. Feldman Paul V. Shalhoub Robin Spigel Debra C. McElligott

787 Seventh Avenue New York, New York 10019 Telephone: (212) 728-8000 Facsimile: (212) 728-8111