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Proposed Counsel to the Debtors

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

IN RE: Chapter 11

§§ CASE NO. 15-12552-smb GMI USA MANAGEMENT, INC., et al

§ (Joint Administration Requested) Debtors.

NOTICE OF COMMENCEMENT OF CHAPTER 11 CASES AND HEARING ON FIRST **DAY MOTIONS**

PLEASE TAKE NOTICE that on September 15, 2015 (the "Petition Date") GMI USA Management, Inc. ("GMI USA"), Global Maritime Investments Holdings Cyprus Limited, Global Maritime Investments Vessel Holdings Pte. Limited, Global Maritime Investments Cyprus Limited, and Global Maritime Investments Resources (Singapore) Pte. Limited (collectively the "**Debtors**", and each a "**Debtor**"), each filed a voluntary petition for relief under

¹ The Debtors in these Chapter 11 cases include GMI USA Management, Inc. , Global Maritime Investments Holdings Cyprus Limited, Global Maritime Investments Vessel Holdings Pte. Limited, Global Maritime Investments Cyprus Limited and Global Maritime Investments Resources (Singapore) Pte. Limited.

chapter 11 of title 11 of the United States Code (the "<u>Bankruptcy Code</u>") in the United States Bankruptcy Court for the Southern District of New York (the "<u>Court</u>").

PLEASE TAKE FURTHER NOTICE that on the Petition Date, in addition to their chapter 11 petitions, the Debtors have filed or will file the following first day motions and related pleadings (collectively, the "**First Day Pleadings**"):

- 1. **Joint Administration Motion.** Motion for Order Directing Procedural Joint Administration of Affiliated Debtors Pursuant to Federal Rule of Bankruptcy Procedure 1015 [Docket No. 4];
- 2. **DIP Motion.** Motion for Entry of Interim and Final Orders (A) Authorizing the Debtors to Obtain Secured Superpriority Post-Petition Financing; and (B) Prescribing Form and Manner of Notice and Scheduling a Final Hearing [Docket No. 5];
- 3. Cash Management Motion. Motion for an Order (I) Authorizing Continued Use of Existing (a) Cash Management System, (b) Accounts, (c) Business Forms and (d) Deposit Practices, and (II) Waiving the Requirements of Bankruptcy Code §345(b) [Docket No. 6];
- 4. **Motion to Consolidate Matrix.** Motion for Order Authorizing Debtors to (A) File Consolidated Creditor Matrix and (B) File Consolidated List of the Debtors' Largest Unsecured Creditors [Docket No. 7];
- 5. *Motion to Limit/Expedite. Motion to Schedule Expedited Hearing and to Limit Notice* [Docket No. 8];
- 6. **Turnover Motion.** Motion for Order Authorizing Turnover of Funds Belonging to Non-Debtor GMI Panamax Pool Ltd Received by the Debtors [Docket No. 9];
- 7. **Motion to Enforce Stay.** Debtors Motion for the Entry of an Order Pursuant to Bankruptcy Code §§ 105(A), 352, 365, and 525 Enforcing and Restating Automatic Stay, Ipso Facto, and Anti-Discrimination Provisions [Docket No. 10];
- 8. Critical Vendor Motion. Debtors Motion for an Order (I) Authorizing the Debtors to Pay or Honor Prepetition Obligations to Foreign Vendors, Service Providers and Governments and Certain Critical Vendors, and (II) Authorizing Financial Institutions Critical Vendors, and (III) Authorizing Financial Institutions [Docket No. 11].

PLEASE TAKE FURTHER NOTICE that a hearing to consider these motions (the "First Day Hearing") has been scheduled by the Court for September 17, 2015 at 2:00 p.m. (prevailing Eastern Time), with such hearing to be held before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, in Courtroom No. 623 at the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004 in accordance with the Court's schedule. The Debtors have requested that the Court consider the relief requested in the First Day Pleadings on a final basis, in certain cases, or on an interim basis pending a final hearing to be scheduled at a later date. The Debtors will file an agenda in advance of the First Day Hearing once all of the First Day Pleadings have been filed.

PLEASE TAKE FURTHER NOTICE that <u>your rights may be affected</u>. You should read the First Day Pleadings carefully and discuss them with your attorney, if you have one in connection with the chapter 11 cases. (If you do not have an attorney, you may wish to consult with one).

PLEASE TAKE FURTHER NOTICE that copies of the First Day Pleadings may be obtained by visiting the Court's website at http://www.nysb.uscourts.gov https://ecf.nysb.uscourts.gov/in accordance with the procedures and fees set forth therein.

PLEASE TAKE FURTHER NOTICE that if you do not want the Court to grant the relief requested in the First Day Pleadings, or if you want the Court to consider your views on the First Day Pleadings, then you or your attorney must attend the First Day Hearing. If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the First Day Pleadings and may enter orders granting the relief requested in the First Day Pleadings.

Dated: September 16, 2015 Houston, Texas

Respectfully submitted,

/s/ John P. Melko_

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