John P. Melko 713-276-5727 (direct dial) 713-276-6727 (direct fax) jmelko@gardere.com Michael K. Riordan 713-276-5178 (direct dial) 713-276-6178 (direct fax) mriordan@gardere.com **GARDERE WYNNE SEWELL LLP** 1000 Louisiana, Suite 2000 Houston, Texas 77002-5011

Proposed Counsel to the Debtors

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

IN RE:	§	Chapter 11
	§	
GMI USA MANAGEMENT, INC., $et al^{l}$	§	CASE NO. 15-12552-smb
	§	
Debtors.	§	(Joint Administration Requested)

## NOTICE OF AGENDA FOR MATTERS SCHEDULED FOR HEARING ON FIRST DAY MATTERS

Hearing Time/Date:	September 17, 2015 at 2:00 p.m. (Prevailing Eastern Time)
Location of Hearing:	The Honorable Judge Shelley C. Chapman United States Bankruptcy Court for the Southern District of New York Alexander Hamilton Custom House One Bowling Green, Courtroom No. 623 New York, New York 10004
Copies of Motions:	A copy of each pleading can be viewed on the Court's website at <u>www.nysb.uscourts.gov</u>

<sup>&</sup>lt;sup>1</sup> 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.

15-12552-smb Doc 26 Filed 09/16/15 Entered 09/16/15 17:33:46 Main Document Pg 2 of 4

#### A. UNCONTESTED MATTERS

- 1. *Joint Administration Motion.* Debtors' Motion for Order Directing Procedural Joint Administration of Affiliated Debtors Pursuant to Federal Rule of Bankruptcy Procedure 1015 [Docket No. 4]
  - a. This Motion is supported by the Declaration of Justin Knowles in Support of Original Petitions, First Day Pleadings and in Accordance with Local Bankruptcy Rule 1007-2 [Docket No. 2]

#### **Objections:** None

**<u>Status</u>**: This matter is going forward.

- DIP Financing Motion. Debtors' 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]
  - a. This Motion is supported by the Declaration of Justin Knowles in Support of Original Petitions, First Day Pleadings and in Accordance with Local Bankruptcy Rule 1007-2 [Docket No. 2]

**Objections:** None

**<u>Status</u>:** This matter is going forward.

- **3.** *Cash Management Motion.* Debtors' 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]
  - a. This Motion is supported by the Declaration of Justin Knowles in Support of Original Petitions, First Day Pleadings and in Accordance with Local Bankruptcy Rule 1007-2 [Docket No. 2]

#### **Objections:** None

**<u>Status</u>**: This matter is going forward.

# 15-12552-smb Doc 26 Filed 09/16/15 Entered 09/16/15 17:33:46 Main Document Pg 3 of 4

- 4. *Consolidated Lists Motion.* Debtors' 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]
  - a. This Motion is supported by the Declaration of Justin Knowles in Support of Original Petitions, First Day Pleadings and in Accordance with Local Bankruptcy Rule 1007-2 [Docket No. 2].

#### **Objections:** None

**<u>Status</u>**: This matter is going forward.

- 5. *Motion to Limit/Expedite*. Debtors' Motion to Schedule Expedited Hearing and to Limit Notice [Docket No. 8]
  - a. This Motion is supported by the Declaration of Justin Knowles in Support of Original Petitions, First Day Pleadings and in Accordance with Local Bankruptcy Rule 1007-2 [Docket No. 2].

### **Objections:** None

**<u>Status</u>:** This matter is going forward.

- 6. *Turnover Motion.* Debtors' Motion for Order Authorizing Turnover of Funds Belonging to Non-Debtor GMI Panamax Pool Ltd Received by the Debtors [Docket No. 9]
  - a. This Motion is supported by the Declaration of Justin Knowles in Support of Original Petitions, First Day Pleadings and in Accordance with Local Bankruptcy Rule 1007-2 [Docket No. 2].

### **Objections:** None

**<u>Status</u>**: This matter is going forward.

- 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]
  - a. This Motion is supported by the Declaration of Justin Knowles in Support of Original Petitions, First Day Pleadings and in Accordance with Local Bankruptcy Rule 1007-2 [Docket No. 2].

## **Objections:** None

NOTICE OF AGENDA FOR MATTERS SCHEDULED FOR HEARING ON FIRST DAY MATTERS - PAGE 3

# 15-12552-smb Doc 26 Filed 09/16/15 Entered 09/16/15 17:33:46 Main Document Pg 4 of 4

- **<u>Status</u>**: This matter is going forward.
- 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]
  - a. This Motion is supported by the Declaration of Justin Knowles in Support of Original Petitions, First Day Pleadings and in Accordance with Local Bankruptcy Rule 1007-2 [Docket No. 2].

**Objections:** None

**<u>Status</u>:** This matter is going forward.

The Debtors reserve the right to amend this Notice of Agenda as appropriate.

Dated: September 16, 2015 Houston, Texas

Respectfully submitted,

/s/ John P. Melko John P. Melko Texas State Bar No. 13919600 713-276-5727 (direct dial) 713-276-6727 (direct fax) jmelko@gardere.com Michael K. Riordan Texas State Bar No. 24070502 713-276-5178 (direct dial) 713-276-6178 (direct fax) mriordan@gardere.com GARDERE WYNNE SEWELL LLP 1000 Louisiana, Suite 2000 Houston, Texas 77002-5011

PROPOSED COUNSEL FOR THE DEBTORS