

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11
: :
Ampex Corporation, : Case No. 08-_____ ()
: :
Debtor. :
-----X

In re : Chapter 11
: :
Ampex Data Systems Corporation, : Case No. 08-_____ ()
: :
Debtor. :
-----X

In re : Chapter 11
: :
Ampex Data International Corporation, : Case No. 08-_____ ()
: :
Debtor. :
-----X

In re : Chapter 11
: :
Ampex Finance Corporation, : Case No. 08-_____ ()
: :
Debtor. :
-----X

In re : Chapter 11
: :
AFC Holdings Corporation, : Case No. 08-_____ ()
: :
Debtor. :
-----X

In re : Chapter 11
: :
Ampex Holdings Corporation, : Case No. 08-_____ ()
: :
Debtor. :
-----X

In re : Chapter 11
: :
Ampex International Sales Corporation, : Case No. 08-_____ ()
: :
Debtor. :
-----X

**APPLICATION FOR ADMINISTRATIVE ORDER PURSUANT TO LOCAL RULE
2016-1 AND SECTIONS 105(a) AND 331 OF THE BANKRUPTCY CODE
ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION AND
REIMBURSEMENT OF EXPENSES OF PROFESSIONALS**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

The debtors and debtors in possession in the above-captioned cases (each, a “**Debtor**” and, collectively, the “**Debtors**”),¹ by and through their proposed attorneys, Willkie Farr & Gallagher LLP, respectively represent:

BACKGROUND

1. On the date hereof (the “**Petition Date**”), Ampex Corporation (“**Ampex**”), Ampex Data Systems Corporation (“**Data Systems**”), and each of the other Debtors filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”). The Debtors intend to continue in the possession of their respective properties and the management of their respective businesses as debtors in possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.² As of the date hereof, no official committee of unsecured creditors has been appointed.

2. The Debtors are a leading innovator and licensor of visual information technology. During their 63-year history, the Debtors have developed substantial proprietary

¹ The last four digits of the taxpayer identification numbers of the Debtors follow in parentheses: (i) Ampex Corporation (7696); (ii) Ampex Data Systems Corporation (2575); (iii) Ampex Data International Corporation (0794); (iv) Ampex Finance Corporation (6720); (v) AFC Holdings Corporation (5726); (vi) Ampex Holdings Corporation (5336); and (vii) Ampex International Sales Corporation (0866). Each of the Debtors has a mailing address of 1228 Douglas Avenue, Redwood City, California 94063.

² The Debtors have nine foreign affiliates that are incorporated in seven countries; one each in the United Kingdom, Japan, Belgium, Colombia, and Brazil, and two each in Germany and Mexico (collectively, the “**Foreign Affiliates**”), respectively. With the exception of the Foreign Affiliates located in the United Kingdom and Japan, none of the Foreign Affiliates conduct meaningful business activity. To date, none of the Foreign Affiliates have commenced insolvency proceedings in this country or abroad.

technology relating to the electronic storage, processing and retrieval of images and other data. Ampex currently owns approximately 370 patents and patent applications covering digital image processing, digital image compression and recording technologies.

3. The Debtors' licensing division generates revenues from granting licenses covering a variety of technologies that were developed when the Debtors designed and manufactured digital video tape recorders and special effects products used in the professional television broadcast and post-production industries. Certain of the Debtors' patented innovations developed for the professional markets have been adopted in consumer products years later. Therefore, several manufacturers of consumer products have in the past paid royalties to Ampex.

4. One of the Debtors, Data Systems, develops and incorporates technology in the design and manufacture of high performance instrumentation recorders, principally used in defense applications to gather digital images and other data from aircraft, satellites and submarines. Data Systems' products are used primarily by manufacturers of commercial aircraft and U.S. and foreign military and intelligence agencies. In addition, Data Systems sells spare parts for professional video recorders and other products that it previously manufactured and marketed to companies involved in television production and post-production.

5. Ampex, the ultimate parent of the other Debtors, is a publicly-held corporation, whose Class A Common Stock has been listed on the NASDAQ Capital Market (formerly the NASDAQ SmallCap Market) since September 1, 2006, under the symbol "AMPX."³

³ From June 24, 2005 to August 31, 2006, the Class A Common Stock was listed on the NASDAQ Global Market (formerly the NASDAQ National Market). From November 21, 2003 to June 23, 2005, the Class A Common Stock was listed for quotation on the OTC Bulletin Board under the symbol "AEXCA."

6. As of March 30, 2008, the Debtors had approximately \$59.6 million of outstanding funded indebtedness. Approximately, \$6.9 million represents principal and interest that has accrued under an indenture dated as of February 28, 2002 (as amended, the “**Indenture**”), between Ampex, as Issuer, and U.S. Bank, National Association, as successor trustee to State Street Bank and Trust Company, as initial trustee. Pursuant to the Indenture, Ampex issued 12% Senior Secured Notes due 2008 (the “**Senior Notes**”), which are secured by liens on certain collateral including Ampex’s rights to receive all royalties, license fees and other payments under certain licensing agreement. The remaining \$52.7 million, as of March 30, 2008, of the Debtors’ outstanding financing relates to pension obligations satisfied by Hillside Capital Incorporated (“**Hillside**”), a former affiliate of the Debtors. For the year ending December 31, 2006, the Debtors reported total revenue of \$35,921,000. As of December 31, 2007, the Debtors’ unaudited balance sheet reflected total assets of \$26,467,000 and total liabilities of \$133,602,000.

7. Despite strong core businesses with positive cash flows, the payments needed to satisfy legacy pension obligations, and the Debtors’ resulting obligations to Hillside, overwhelm the Debtors’ balance sheet. At the direction of Ampex’s Board of Directors, management engaged in discussions with Hillside and, later, known major holders of the Senior Notes to explore a consensual restructuring of the Debtors’ obligations.

8. These discussions were successful and culminated in the Joint Chapter 11 Plan of Reorganization for Ampex Corporation and Its Affiliated Debtors (as may be amended, the “**Plan**”). If consummated, the restructuring transactions contemplated in the Plan will substantially delever the Company and provide additional needed liquidity. As evidenced by a Plan Support Agreement, executed by Hillside and holders of in excess of a majority in amount

of the outstanding Senior Notes, the Plan has a broad base of support.

JURISDICTION

9. This Court has jurisdiction to consider this motion pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicates for the relief requested herein are sections 105(a) and 331 of title 11 of the United States Code (the “**Bankruptcy Code**”) and Rule 2016-1 of the Local Bankruptcy Rules for the Southern District of New York (the “**Local Rules**”).

RELIEF REQUESTED

10. The Debtors have filed applications to retain Willkie Farr & Gallagher LLP (“**WF&G**”) as bankruptcy counsel and Conway MacKenzie & Dunleavy (“**CM&D**”) as financial advisors (collectively, the “**Professionals**”).⁴

11. The Debtors request that procedures for compensating and reimbursing court-approved professionals on a monthly basis be established, comparable to those established in other chapter 11 cases in this Court. See e.g., In re Dana Corp., et al., Case No. 06-10354 (BRL) (Bankr. S.D.N.Y. March 29, 2006); In re Calpine Corp., et al., Case No. 05-60200 (BRL) (Bankr. S.D.N.Y. January 25, 2006); In re Delta Air Lines, Inc., et al., Case No. 05-17923 (ASH) (Bankr. S.D.N.Y. October 6, 2005); In re Northwest Airlines Corp., et al., Case No. 05-17930 (ALG) (Bankr. S.D.N.Y. October 19, 2005).

12. The requested procedures would require each Professional to present to certain Service Parties (as defined below) a detailed statement of services rendered and expenses

⁴ The defined term Professionals as used herein also includes any professionals retained by any official committees appointed in this case, or professionals (other than ordinary course professionals) retained by the Debtors after the date hereof.

incurred by such Professional for the prior month. If no objection is filed within thirty-five (35) days, the Debtors would pay eighty (80%) of the amount of fees incurred for the month, with a twenty percent (20%) holdback, and one hundred percent (100%) of disbursements for the month. These payments would be subject to Court approval as part of the normal interim fee application process, approximately every 120 days.

13. Specifically, the Debtors propose that the monthly payment of compensation and reimbursement of expenses of the Professionals be structured as follows:
 - a. On or before the twentieth (25th) day following the month for which compensation is sought, each Professional will serve a monthly statement, by hand or overnight delivery, on: (i) the Debtors: Ampex Corporation, 1228 Douglas Avenue, Redwood City, CA 94063, Attn: Ray Venema.; (ii) counsel to the Debtors: Willkie Farr & Gallagher LLP, 787 Seventh Avenue, New York, New York 10019, Attn: Rachel C. Strickland, Esq.; (iii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004, Attn: _____; (iv) counsel to the Indenture Trustee: Nixon Peabody LLP, 100 Summer Street, Boston, MA 02110, Attn: Robert J. Coughlin, Esq.; (v) counsel to Hillside: Milbank, Tweed, Hadley & McCloy LLP, Attn: Jessica Fink, Esq. and Dennis Dunne, Esq.; and (vi) counsel to any official committee appointed in these cases (collectively, the “**Service Parties**”) for interim approval and allowance pursuant to section 331 of the Bankruptcy Code for professional services rendered and reimbursement of expenses incurred during the relevant compensation period;
 - b. The monthly statement need not be filed with the Court and a courtesy copy need not be delivered to chambers as approval of such statement and payment under the procedures set forth herein is not intended to alter the fee application requirements outlined in sections 330 and 331 of the Bankruptcy Code. Professionals are still required to serve and file interim and final applications for approval of fees and expenses in accordance with the relevant provisions of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure and the Local Rules of this Court;
 - c. Each monthly fee statement must contain a list of the individuals who provided services during the statement period, their respective titles and billing rates, the aggregate hours spent by each individual, a reasonably detailed breakdown of the disbursements incurred, and contemporaneously maintained time entries for each individual in increments of tenths (1/10) of an hour; except to the extent otherwise ordered by the Court;

- d. Each person receiving a statement will have thirty-five (35) days from the date of the statement to review and object to the compensation or reimbursement sought in any particular statement (a “**Fee Objection**”). All such objections must be in writing setting forth the nature of the objection with particularity and the amount of fees or expenses at issue and be served upon the Professional whose statement is objected to and the other Service Parties;
- e. If no objection is served in accordance with paragraph (d), upon the expiration of the twenty (20) day period, the Debtors shall promptly pay eighty percent (80%) of the fees and one hundred percent (100%) of the expenses identified in each monthly statement;
- f. If the Debtors receive an objection to a particular statement, then it shall withhold payment on that portion of the fee statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth in paragraph (e);
- g. If an objecting party and the applicable Professional are able to resolve the Fee Objection, such Professional shall serve each Service Party with a written statement indicating that the Fee Objection is withdrawn and describing in detail the terms of the resolution (a “**Fee Settlement Statement**”). Within two (2) Business Days of receipt of such Fee Settlement Statement, the Debtors shall promptly pay, in accordance with paragraph (e), that portion of the fee statement that is no longer subject to a Fee Objection;
- h. All unresolved Fee Objections shall be determined by the Court at the next interim or final fee application hearing to be held by the Court or such other time as the Court may specify;
- i. The decision by any party not to object to a fee statement shall not prejudice or be a waiver of that party’s right to object to any fee application subsequently made to the Court in accordance with the Bankruptcy Code;
- j. Approximately every 120 days, but no more than every 150 days, each of the Professionals shall serve and file with the Court an application for interim or final Court approval and allowance, pursuant to sections 330 and 331 of the Bankruptcy Code (as applicable), of the compensation and reimbursement of expenses requested;
- k. Any Professional who fails to file an application seeking approval of compensation and expenses previously paid under the procedures set forth herein shall be ineligible to receive further monthly payments of fees or expenses as provided herein until such application is filed;

- l. The pendency of an application or a Court order providing that payment of compensation or reimbursement of expenses was improper shall not disqualify a Professional from the future payment of compensation or reimbursement of expenses as set forth above, unless otherwise ordered by the Court;
- m. Neither the payment of, nor the failure to pay, in whole or in part, monthly compensation and reimbursement as provided herein, shall have any effect on the Court's interim and final allowance of compensation and reimbursement of any Professional; and
- n. Counsel for any official committee may, in accordance with the foregoing procedure for monthly compensation and reimbursement of Professionals, collect and submit statements of expenses, with supporting vouchers, from members of the committee he or she represents; provided, however, that such committee counsel ensures that these reimbursement requests comply with this Court's Administrative Orders dated June 24, 1991 and April 21, 1995.

14. To ensure the efficiency of these proceedings the Debtors further request that the Court limit notice of hearings to consider interim applications to the Service Parties and any other party who has filed a notice of appearance with the Clerk of the Court and requested such notice prior to the day any such application is served. The Debtors will include all payments to Professionals on its monthly operating reports, detailed so as to state the amount paid to each Professional.

BASIS FOR RELIEF

15. Local Rule 2016-1 requires that persons seeking compensation or reimbursement of expenses must comply with guidelines promulgated by this Court. Local Bankruptcy Rule Southern District of New York 2016-1. The procedures outlined herein will help ensure compliance with Local Rule 2016-1 as they are similar to those contained in the Order of this Court Establishing Procedures for Monthly Compensation and Reimbursement of Expenses of Professionals, dated January 24, 2000 (the "**General Order**"). There is ample

authority for the Court to approve the procedures requested herein, notwithstanding the fact that such procedures differ from those in the General Order.

16. Section 331 of the Bankruptcy Code provides, in relevant part, as follows:

A trustee, an examiner, a debtors' attorney, or any professional person employed under section 327 or 1103 of this title may apply to the court not more than once every 120 days after an order for relief in a case under this title, or more often if the court permits, for such compensation for services rendered before the date of such an application or reimbursement for expenses incurred before such date as is provided under section 330 of this title.

11 U.S.C. § 331.

17. Section 105(a) of the Bankruptcy Code provides, in relevant part, as follows:

The court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title.

11 U.S.C. § 105(a).

18. As noted above, procedures for compensating and reimbursing court-approved professionals have been established in other chapter 11 cases in this Court. Such procedures are needed to avoid having professionals fund the reorganization case. See In re Int'l Horizons, Inc., 10 B.R. 895, 897 (Bankr. N.D. Ga. 1981) (court established procedures for monthly interim compensations). Appropriate factors to consider include "the size of [the] reorganization cases, the complexity of the issues involved, and the time required on the part of the attorneys for the debtors in providing services necessary to achieve a successful reorganization of the debtors[.]" Id. at 897.

19. The Debtors submit that the efficient administration of these chapter 11 cases and the predictability of the Debtors' cash flow will be significantly aided by establishing

the interim compensation and expense reimbursement procedures proposed herein. Accordingly, the relief requested is in the best interests of the Debtors, their estates, and their creditors.

NOTICE

20. Notice of this Motion will be given to: (a) the United States Trustee for the Southern District of New York; (b) counsel to Hillside; (c) counsel to the Indenture Trustee; and (d) the parties listed on the Debtors' consolidated list of fifty (50) largest unsecured creditors.

The Debtors submit that, under the circumstances, no other or further notice is required.

21. No previous motion for the relief sought herein has been made to this or any other court.

22. Because this Motion raises no novel issues of law, and the authorities relied upon herein are set forth above, the Debtors respectfully submit that the Motion itself satisfies the requirements of Local Bankruptcy Rule 9013-1(b) regarding the submission of a memorandum of law.

CONCLUSION

WHEREFORE, the Debtors respectfully request that the Court enter an order, substantially in the form annexed hereto as Exhibit A, granting the Motion and such other and further relief as may be just and proper.

Dated: March 30, 2008
New York, New York

Ampex Corporation et al.,
Debtors and Debtors in Possession

By: /s/ D. Gordon Strickland
D. Gordon Strickland
Chief Executive Officer

WILLKIE FARR & GALLAGHER LLP
Proposed Attorneys for Debtors and
Debtors in Possession

By: /s/ Rachel C. Strickland
Matthew Feldman (MF-8961)
(A Member of the Firm)
Rachel C. Strickland (RS-3787)
(A Member of the Firm)
Lauren C. Cohen (LC-3262)

787 Seventh Avenue
New York, New York 10019
(212) 728-8000

EXHIBIT A

Proposed Order

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11
: :
Ampex Corporation, : Case No. 08-_____ ()
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Debtor. :
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In re : Chapter 11
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In re : Chapter 11
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In re : Chapter 11
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**ORDER PURSUANT TO LOCAL RULE 2016-1 AND
SECTIONS 105(a) AND 331 OF THE BANKRUPTCY
CODE ESTABLISHING PROCEDURES
FOR INTERIM COMPENSATION AND
REIMBURSEMENT OF EXPENSES OF PROFESSIONALS**

Upon the application (the “**Application**”) of the debtors and debtors in possession in the above-captioned cases (the “**Debtors**”), pursuant to rule 2016-1 of the Local Rules of Bankruptcy Procedure for the Southern District of New York (the “**Local Rules**”) and sections 105(a) and 331 of title 11 of the United States Code (the “**Bankruptcy Code**”), seeking entry of an order establishing procedures for interim compensation and reimbursement of expenses of certain professionals retained in these cases, as more fully set forth in the Application; and upon the Affidavit of Craig L. McKibben, Chief Financial Officer, in Support of Chapter 11 Petitions and First Day Pleadings; and notice of the Application having been provided in accordance with the Application; and it appearing that no other or further notice need be provided; and the Court having determined that the relief sought in the Application is in the best interests of the Debtors, their estates, creditors and parties in interest; and after due deliberation and sufficient cause appearing therefor; it is hereby

ORDERED, ADJUDGED AND DECREED, that:

1. The Application is granted to the extent set forth herein.
2. Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Application.
3. Except as may otherwise be provided in Court orders authorizing the retention of specific professionals, all Professionals in this case may seek monthly compensation in accordance with following procedures:
 - a. On or before the twentieth (25th) day following the month for which compensation is sought, each Professional will serve a monthly statement,

by hand or overnight delivery, on: (i) the Debtors: Ampex Corporation, 1228 Douglas Avenue, Redwood City, CA 94063, Attn: Ray Venema.; (ii) counsel to the Debtors: Willkie Farr & Gallagher LLP, 787 Seventh Avenue, New York, New York 10019, Attn: Rachel C. Strickland, Esq.; (iii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004, Attn: _____; (iv) counsel to the Indenture Trustee: Nixon Peabody LLP, 100 Summer Street, Boston, MA 02110, Attn: Robert J. Coughlin, Esq.; (v) counsel to Hillside: Milbank, Tweed, Hadley & McCloy LLP, Attn. Jessica Fink, Esq. and Dennis Dunne, Esq.; and (vi) counsel to any official committee appointed in these cases (collectively, the “**Service Parties**”) for interim approval and allowance pursuant to section 331 of the Bankruptcy Code for professional services rendered and reimbursement of expenses incurred during the relevant compensation period;

- b. The monthly statement need not be filed with the Court and a courtesy copy need not be delivered to chambers as approval of such statement and payment under the procedures set forth herein is not intended to alter the fee application requirements outlined in sections 330 and 331 of the Bankruptcy Code. Professionals are still required to serve and file interim and final applications for approval of fees and expenses in accordance with the relevant provisions of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure and the Local Rules of this Court;
- c. Each monthly fee statement must contain a list of the individuals who provided services during the statement period, their respective titles and billing rates, the aggregate hours spent by each individual, a reasonably detailed breakdown of the disbursements incurred, and contemporaneously maintained time entries for each individual in increments of tenths (1/10) of an hour; except to the extent otherwise ordered by the Court;
- d. Each person receiving a statement will have thirty-five (35) days from the date of the statement to review and object to the compensation or reimbursement sought in any particular statement (a “**Fee Objection**”). All such objections must be in writing setting forth the nature of the objection with particularity and the amount of fees or expenses at issue and be served upon the Professional whose statement is objected to and the other Service Parties;
- e. If no objection is served in accordance with paragraph (d), upon the expiration of the twenty (20) day period, the Debtors shall promptly pay eighty percent (80%) of the fees and one hundred percent (100%) of the expenses identified in each monthly statement;
- f. If the Debtors receive an objection to a particular statement, then it shall withhold payment on that portion of the fee statement to which the

objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth in paragraph (e);

- g. If an objecting party and the applicable Professional are able to resolve the Fee Objection such Professional shall serve each Service Party with a written statement indicating that the Fee Objection is withdrawn and describing in detail the terms of the resolution (a “**Fee Settlement Statement**”). Within two (2) Business Days of receipt of such Fee Settlement Statement, the Debtors shall promptly pay, in accordance with paragraph (e), that portion of the fee statement that is no longer subject to a Fee Objection;
- h. All unresolved Fee Objections shall be determined by the Court at the next interim or final fee application hearing to be held by the Court or such other time as the Court may specify;
- i. The decision by any party not to object to a fee statement shall not prejudice or be a waiver of that party’s right to object to any fee application subsequently made to the Court in accordance with the Bankruptcy Code;
- j. Approximately every 120 days, but no more than every 150 days, each of the Professionals shall serve and file with the Court an application for interim or final Court approval and allowance, pursuant to sections 330 and 331 of the Bankruptcy Code (as applicable), of the compensation and reimbursement of expenses requested;
- k. Any Professional who fails to file an application seeking approval of compensation and expenses previously paid under the procedures set forth herein shall be ineligible to receive further monthly payments of fees or expenses as provided herein until such application is filed;
- l. The pendency of an application or a Court order providing that payment of compensation or reimbursement of expenses was improper shall not disqualify a Professional from the future payment of compensation or reimbursement of expenses as set forth above, unless otherwise ordered by the Court;
- m. Neither the payment of, nor the failure to pay, in whole or in part, monthly compensation and reimbursement as provided herein, shall have any effect on the Court’s interim and final allowance of compensation and reimbursement of any Professional; and
- n. Counsel for any official committee may, in accordance with the foregoing procedure for monthly compensation and reimbursement of professionals, collect and submit statements of expenses, with supporting vouchers, from members of the committee he or she represents; provided, however, that such committee counsel ensures that these reimbursement requests comply

with this Court's Administrative Orders dated June 24, 1991 and April 21, 1995.

4. Each Professional may seek, in its first request for compensation and reimbursement of expenses pursuant to this Order, compensation for work performed and reimbursement of expenses incurred during the period beginning on the date of the Professional's retention and ending on the last day of the last full calendar month ending before the entry of this Order.

5. The amount of fees and disbursements sought by a Professional must be set forth in U.S. dollars.

6. The Debtors shall include all payments to Professionals in its monthly operating reports, detailed so as to state the amount paid to each Professional.

7. Any party may object to requests for payments made pursuant to this Order on the grounds that the Debtors have not timely filed monthly operating reports, remained current with their administrative expenses and 28 U.S.C. § 1930 fees, or a manifest exigency exists by seeking a further order of this Court, otherwise, this Order shall continue and shall remain in effect during the pendency of these cases.

8. All time periods set forth in this Order shall be calculated in accordance with Rule 9006(a) of the Federal Rules of Bankruptcy Procedure.

9. Notice of hearings to consider interim applications shall be served on the Service Parties and all parties who have filed a notice of appearance with the Clerk of the Court and requested such notice, and no further notice is necessary or required; provided, however, that the Debtors must serve a copy of this Order on all entities specified in paragraph 3(a) hereof.

10. The requirement pursuant to Local Rule 9013-1(b) that the Debtors file a memorandum of law and support of the Motion is hereby waived.

11. This Court shall retain jurisdiction over any and all matters arising from or related to the implementation or interpretation of this Order.

Dated: _____, 2008
New York, New York

UNITED STATES BANKRUPTCY JUDGE