

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
SOUTHEASTERN DIVISION

In re:	§	Chapter 11
	§	
	§	Case No. 20-43597
	§	
BRIGGS & STRATTON CORPORATION, <i>et al.</i> ,	§	(Joint Administration Requested)
	§	
Debtors. <sup>1</sup>	§	Hearing Date: July 21, 2020
	§	Hearing Time: 10:00 a.m. (Central Time)
	§	Hearing Location: Courtroom 5-North

**NOTICE OF FILING OF CHAPTER 11 PETITIONS, FIRST DAY MOTIONS, AND PROPOSED HEARING ON FIRST DAY MOTIONS**

PLEASE TAKE NOTICE that on July 20, 2020 (the “**Petition Date**”), Briggs & Stratton Corporation and its affiliated debtors and debtors in possession (each a “**Debtor**” and, collectively, the “**Debtors**”) each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”) with the United States Bankruptcy Court for the Eastern District of Missouri (the “**Court**”) commencing the above-captioned chapter 11 cases.

PLEASE TAKE FURTHER NOTICE that, together with the chapter 11 petitions, the Debtors also requested an expedited hearing before the Court (the “**First Day Hearing**”) to consider certain motions (collectively, the “**First Day Motions**”) filed on the Petition Date and listed on the Proposed First Day Agenda attached hereto as **Exhibit A**.

PLEASE TAKE FURTHER NOTICE that the Court has scheduled the First Day Hearing to commence on **July 21, 2020 at 10:00 a.m. (prevailing Central Time)** in Courtroom

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are: Briggs & Stratton Corporation (2330), Billy Goat Industries, Inc. (4442), Allmand Bros., Inc. (4710), Briggs & Stratton International, Inc. (9957), and Briggs & Stratton Tech, LLC (2102). The address of the Debtors’ corporate headquarters is 12301 West Wirth Street, Wauwatosa, Wisconsin 53222.



5-North of the Thomas F. Eagleton United States Courthouse, 111 South Tenth Street, St. Louis, Missouri. Interested parties who wish to appear telephonically may request dial-in information from the Courtroom Deputy, Shontelle McCoy, at (314) 244-4806, [Shontelle\\_McCoy@moeb.uscourts.gov](mailto:Shontelle_McCoy@moeb.uscourts.gov).

**PLEASE TAKE FURTHER NOTICE** that a copy of each of the First Day Motions may be obtained: (i) by accessing the Court's website at <https://ecf.moeb.uscourts.gov> through an account obtained from the Pacer Service Center at 1-800-676-6856 or [www.pacer.gov](http://www.pacer.gov) or (ii) free of charge, by accessing the Debtors' case information website at <http://www.kccllc.net/Briggs>.

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

**PLEASE TAKE FURTHER NOTICE** that if you do not want the Court to grant the relief requested in the First Day Motions, or if you want the Court to consider your views on the First Day Motions, 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 Motions and may enter orders granting the relief requested in the First Day Motions.

Dated: July 20 2020  
St. Louis, Missouri

Respectfully submitted,

CARMODY MACDONALD P.C.

/s/ Robert E. Eggmann

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*Proposed Local Counsel to the Debtors  
and Debtors in Possession*

-and-

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*Proposed Counsel to the Debtors  
and Debtors in Possession*

Exhibit A

Proposed Agenda

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
SOUTHEASTERN DIVISION

In re: § Chapter 11  
§  
BRIGGS & STRATTON § Case No. 20-43597-399  
CORPORATION, *et al.*, §  
§ (Joint Administration Requested)  
§  
Debtors.<sup>1</sup> § Hearing Date: July 21, 2020  
§ Hearing Time: 10:00 a.m. (Central Time)  
§ Hearing Location: Courtroom 5-North

**PROPOSED FIRST DAY AGENDA FOR HEARING  
ON JULY 21, 2020 AT 10:00 A.M. (PREVAILING CENTRAL TIME)**

Location of Hearing: United States Bankruptcy Court for the Eastern District of Missouri, Thomas F. Eagleton U.S. Courthouse, before the Honorable Barry S. Schermer, **Courtroom 5-North**, 111 South 10th Street, St. Louis, MO 63102

In support of the following relief requested at the First-Day Hearing, the Debtors rely on the *Declaration of Jeffrey Ficks, Financial Advisor Of Briggs & Stratton Corporation, In Support Of The Debtors' Chapter 11 Petitions And First Day Relief [ECF No. 51]*.

1. Motion to Expedite - Motion of the Debtors and Debtors in Possession for the Entry of an Order Scheduling an Expedited Hearing on First Day Motions Filed by the Debtors.

Status: This matter is going forward

2. Joint Administration - Motion of Debtors for Entry of an Order Directing Joint Administration of Chapter 11 Cases.

Status: This matter is going forward.

3. KCC Retention - Debtors' Application for Appointment of Kurtzman Carson Consultants, LLC as Claims and Noticing Agent and Administrative Advisor As of the Petition Date.

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Status: This matter is going forward.

4. Motion to Exceed Page Limits - Motion of Debtors for Leave to Exceed the Page Limitation in Their First Day Motions.

Status: This matter is going forward.

5. Schedule Extension - Motion of Debtors for Order (I) Extending the Time to File Schedules and Statements; (II) Extending the Time to Schedule the Meeting of Creditors; (III) Waiving the Requirements to File Equity Lists and Provide Notice to Equity Security Holders; (IV) Authorizing the Debtors to File a Consolidated List of the Debtors' Thirty (30) Largest Unsecured Creditors; (V) Authorizing the Debtors to File a Consolidated and Redacted Creditor Matrix; and (VI) Approving the Manner of Service of Notice of Case Commencement.

Status: This matter is going forward.

6. Taxes - Motion of Debtors for Interim and Final Orders (I) Authorizing Payment of Certain Prepetition Taxes and Fees; and (II) Granting Related Relief.

Status: This matter is going forward.

7. Utilities - Motion of Debtors for Interim and Final Order[s] (I) Authorizing Assurance of Payment to Utility Providers, (II) Establishing Procedures Providing Adequate Assurance and Resolving Objections by Utility Providers, and (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Service; and (IV) Granting Related Relief.

Status: This matter is going forward.

8. Cash Management - Motion of Debtors for Entry of Orders (I) Authorizing Debtors to (A) Continue Existing Cash Management System, (B) Honor Certain Prepetition Obligations Related to the Use Thereof, (C) Continue Intercompany Transactions and Provide Administrative Expense Priority for Postpetition Intercompany Claims, and (D) Continue Supply Chain Financing; (II) Waiving Requirements of section 345(b) of the Bankruptcy Code; and (III) Granting Related Relief.

Status: This matter is going forward.

9. Customer Programs - Motion of Debtors for Interim and Final Orders Granting Authority to (I) Honor Certain Prepetition Obligations to Customers and (II) Continue and Maintain Related Customer Programs in the Ordinary Course of Business.

Status: This matter is going forward.

10. Insurance - Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to (A) Continue Insurance Policies and Programs, (B) Continue Surety Bond Program, (C) Pay All Insurance and Surety Obligations, (II) Lifting the Automatic Stay for Workers' Compensation Claims, and (III) Granting Related Relief.

Status: This matter is going forward.

11. Critical Vendor / 503(b)(9) / Foreign Creditors - Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to Pay Prepetition Obligations in the Ordinary Course of Business to (A) Critical Vendors, (B) Foreign Creditors, and (C) 503(b)(9) Claimants; and (II) Granting Related Relief.

Status: This matter is going forward.

12. Shippers & Warehousemen - Motion of Debtors for Order (I) Authorizing Payment of Prepetition Claims of Shippers, Warehousemen, Import/Export Providers, and Other Lien Claimants, (II) Authorizing Payment of Such Obligation in the Ordinary Course of Business, and (III) Granting Related Relief.

Status: This matter is going forward.

13. Wages - Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to (A) Pay Prepetition Wages, Salaries, Commissions, Employee Benefits, and Other Obligations, (B) Maintain Employee Benefit Programs, and (C) Pay Related Administrative Obligations; and (II) Granting Related Relief.

Status: This matter is going forward.

14. NOL - Motion of Debtors for Entry of Orders Establishing Notification Procedures and Approving Restrictions on Certain Transfers of Interests In and Claims Against the Debtors.

Status: This matter is going forward.

15. Case Management - Debtors' Motion for an Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy rules 1015(c), 2002 and 9007 Establishing Certain Notice, Case Management and Administrative Procedures.

Status: This matter is going forward.

16. Weil Retention – Application of Debtors Pursuant to 11 U.S.C. § 327(a), Fed R. Bankr. P. 2014(a) and 2016, and Local Rules 2014 and 2016-1 for Authority to Retain and Employ Weil, Gotshal & Manges LLP as Attorneys for the Debtors Effective as of the Petition Date

Status: This matter is going forward.

17. Carmody Retention - Debtors' Application for Authority to Employ Carmody MacDonald P.C. as Local Restructuring Counsel for the Debtors.

Status: This matter is going forward.

18. EY Retention - Application of Debtors Pursuant to 11 U.S.C. §§ 327(a) and 330, Fed. R. Bankr. P. 2014(a) and 2016, and Local Rules 2014(a) for Authority to Retain and Employ Ernst & Young LLP as Financial Advisor to the Debtors Effective as of the Petition Date.

Status: This matter is going forward.

19. HL Retention - Debtors' Application for Authority to Employ and Retain Houlihan Lokey Capital, Inc. as Investment Banker for the Debtors *Nunc Pro Tunc* to the Petition Date.

Status: This matter is going forward.

20. Deloitte Retention - Application of Debtors for Interim and Final Orders Authorizing the Debtors to Retain and Employ Deloitte & Touche LLP as Independent Auditors *Nunc Pro Tunc* to Petition Date.

Status: This matter is going forward.



21. Foley Retention - Application of Debtors for an Order Authorizing the Retention and Employment of Foley & Lardner LLP as Special Counsel for the Debtors *Nunc Pro Tunc* to the Petition Date.

Status: This matter is going forward.

22. DIP Motion - Motion of Debtors for Interim and Final Orders (i) Authorizing Debtors to Obtain Postpetition Financing, (ii) Authorizing Debtors to Use Cash Collateral, (iii) Granting Liens and Superpriority Claims, (iv) Granting Adequate Protection to Prepetition Secured Parties, (v) Modifying Automatic Stay, (vi) Scheduling Final Hearing and (vii) Granting Related Relief.

Status: This matter is going forward.

23. Motion to File Fee Letter Under Seal – Motion to File Under Seal Fee Letter Related to Motion of Debtors for Interim and Final Orders (i) Authorizing Debtors to Obtain Postpetition Financing, (ii) Authorizing Debtors to Use Cash Collateral, (iii) Granting Liens and Superpriority Claims, (iv) Granting Adequate Protection to Prepetition Secured Parties, (v) Modifying Automatic Stay, (vi) Scheduling Final Hearing and (vii) Granting Related Relief.

Status: This matter is going forward.