

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re: NEIGHBORS LEGACY HOLDINGS, INC., <i>et al.,</i> Debtors.¹	§ § Chapter 11 § § Case No. 18-33836 (MI) § § (Joint Administration Pending) §
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**DEBTORS’ NOTICE OF DESIGNATION AS
COMPLEX CHAPTER 11 BANKRUPTCY CASES**

On July 12, 2018 (the “Petition Date”), the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed voluntary petitions for relief under title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of Texas (the “Court”). The undersigned proposed counsel believes that these chapter 11 cases qualify as complex chapter 11 cases because:

- X The Debtors have total debt of more than \$10 million;
- X There are more than 50 parties in interest in this case;
- Claims against the debtors are publicly traded;
- Other

WHEREFORE, the Debtors respectfully request that the Court enter an order substantially in the form attached hereto, granting: (i) the relief requested herein; and (ii) such other and further relief to the Debtors as the Court may deem proper.

¹ Due to the large number of Debtors in these chapter 11 cases, a complete list of the Debtors and the last four digits of their tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ proposed claims and noticing agent at www.kccllc.net/neighbors. The location of Debtors’ principal place of business and the Debtors’ service address is: 10800 Richmond Avenue, Houston, Texas 77042.



Dated: July 12, 2018

PORTER HEDGES LLP

By: /s/ John F. Higgins

John F. Higgins

State Bar No. 09597500

Eric M. English

State Bar No. 24062714

Genevieve M. Graham

State Bar No. 24085340

1000 Main Street, 36th Floor

Houston, Texas 77002

Telephone: (713) 226-6000

Fax: (713) 226-6248

Proposed Counsel for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
	§	
NEIGHBORS LEGACY HOLDINGS, INC.,	§	Case No. 18-33836 (MI)
<i>et al.,</i>	§	
	§	(Joint Administration Pending)
Debtors. ¹	§	

**ORDER GRANTING COMPLEX
CHAPTER 11 BANKRUPTCY CASES TREATMENT**

These bankruptcy cases were filed on July 12, 2018. A Notice of Designation as Complex Chapter 11 Bankruptcy Cases was filed. Based on its review of the initial pleadings, the Court concludes that the complex chapter 11 case designation is appropriate. Accordingly, the Court orders:

1. The Debtors must maintain a consolidated master service list (the “Master Service List”) identifying the parties that must be served whenever a motion or other pleading requires notice. Unless otherwise required by the Bankruptcy Code or the Bankruptcy Rules, notices of motions and other matters will be limited to the parties on the Master Service List.

- (a) The Master Service List must initially include the following parties and/or their counsel, if requested: Notice of this Motion shall be given to (a) the Office of the United States Trustee for the Southern District of Texas; (b) the Debtors’ 50 largest unsecured creditors on a consolidated basis or any official committee of unsecured creditors appointed in these chapter 11 cases, if any, from and after its appointment; (c) the lenders under the Debtors’ prepetition loan facilities; (d) the United States Attorney’s Office for the Southern District of Texas; (e) the Internal Revenue Service; (f) any party that has requested notice pursuant to Bankruptcy Rule 2002 as of the time of service; and (g) all parties on whom the Court orders notice.

¹ Due to the large number of Debtors in these chapter 11 cases, a complete list of the Debtors and the last four digits of their tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ proposed claims and noticing agent at www.kccllc.net/neighbors. The location of Debtors’ principal place of business and the Debtors’ service address is: 10800 Richmond Avenue, Houston, Texas 77042.

- (b) Any party in interest that wishes to receive notice, other than as listed on the Master Service List, shall be added to the Master Service List by filing with the Court and serving the Debtors and the Debtors' counsel with a notice of appearance and request for service.
- (c) Parties on the Master Service List, who have not otherwise consented to service by e-mail, through the act of becoming a registered e-filer in this district, are encouraged to provide an e-mail address for service of process and to authorize service by e-mail; consent to e-mail service may be included in the party's notice of appearance and request for service; in the event a party has not consented to email service, a "hard copy" shall be served by fax or by regular mail.
- (d) The initial Master Service List must be filed within three days after entry of this Order. A revised Master Service List must be filed within seven days after the initial Master Service List is filed. The Debtors must update the Master Service List thereafter, and shall file a copy of the updated list:
 - (i) at least every seven days during the first thirty days of the case;
 - (ii) at least every fifteen days during the next sixty days of the case; and
 - (iii) at least every thirty days thereafter throughout the case.

The Court sets _____ of each month at ____:____ ____ (Central Time) as the pre-set hearing day and time for hearing all motions and other matters in these chapter 11 cases. The Court sets the following dates and times for the next two months as the pre-set hearing date and time for hearing all motions and other matters in these chapter 11 cases: _____ . Settings for the following months will be published by the Court no later than thirty (30) days prior to the first hearing date in the said following months. (Any exceptions will be noted on the Court's internet schedule, available at www.txsb.uscourts.gov).

- (e) All motions and other matters requiring hearing, but not requiring expedited or emergency hearing, shall be noticed for hearing on the next hearing day that is at least twenty-one (21) days after the notice is mailed. As a preface to each pleading, just below the case caption, the pleading shall state:

THIS MOTION SEEKS ENTRY OF AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY

THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

A HEARING WILL BE CONDUCTED ON THIS MATTER ON [___], 2018 AT [___]:00 [___].M. IN COURTROOM 404, UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS, 515 RUSK STREET, HOUSTON, TEXAS 77002.

- (f) All motions and other matters requiring expedited or emergency hearing shall comply with the usual Court requirements for explanation and verification of the need for emergency or expedited hearing. Specifically, if a party in interest has a situation that it believes requires consideration on less than twenty-one (21) days' notice, or an emergency that it believes requires consideration on less than five (5) business days' notice, then the motion's title shall contain the word "Emergency." Further, in addition to the notice required by Bankruptcy Local Rule 9013-1(b), the movant must include the following paragraph:

EMERGENCY RELIEF HAS BEEN REQUESTED. IF THE COURT CONSIDERS THE MOTION ON AN EMERGENCY BASIS, THEN YOU WILL HAVE LESS THAN 21 DAYS TO ANSWER. IF YOU OBJECT TO THE REQUESTED RELIEF OR IF YOU BELIEVE THAT THE EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU SHOULD FILE AN IMMEDIATE RESPONSE.

- (g) The Court will make its best effort to rule on the motion for expedited or emergency hearing within twenty-four (24) hours of the time it is presented. If the Court grants the motion for expedited or emergency hearing, the underlying motion will be set by the courtroom deputy at the next available preset hearing day or at some other appropriate shortened date approved by the Court. The party requesting the hearing shall be responsible for providing proper notice in accordance with this Order, the Bankruptcy Code, and the Bankruptcy Rules.

The Court's procedures for telephonic participation in hearings are published on the Court's website. Those procedures apply in this case. No motion is required to authorize telephonic participation. Dial-in information and participation information is on the website.

If a matter is properly noticed for hearing and the parties reach a settlement of the dispute prior to the final hearing, the parties may announce the settlement at the scheduled hearing. If the Court determines that the notice of the dispute and the hearing is adequate notice of the effects of the settlement (i.e., that the terms of the settlement are not materially different from what parties in interest could have expected if the dispute were fully litigated), the Court may approve the settlement at the hearing without further notice of the terms of the settlement.

The Debtors must give notice of this Order to all parties listed on the Master Service List within seven (7) days of its entry. If a party in interest objects to the provisions of this Order, that party may file a motion articulating the objection and the relief requested. After hearing the objection and any responses the Court may reconsider any part of this Order and may grant relief, if appropriate.

Dated: _____, 2018.

THE HONORABLE MARVIN ISGUR
UNITED STATES BANKRUPTCY JUDGE