

BLANK ROME LLP  
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Joel C. Shapiro

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re: :  
: Case No. 09-15059 (AJG)  
CHIYODA AMERICA, INC., : Chapter 11 Case  
: Debtor. :  
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**AGENDA FOR SEPTEMBER 23, 2009 HEARING**

**Time and Date of Hearing:** September 23, 2009 at 11:00 a.m. (Eastern Time)  
**Location of Hearing:** The Honorable Judge Arthur J. Gonzalez  
United States Bankruptcy Court  
One Bowling Green, Room 523  
New York, New York 10004  
**Copies of Motion:** A copy of each pleading can be viewed and/or  
obtained by (i) accessing the Court’s website at  
[www.nysb.uscourts.gov](http://www.nysb.uscourts.gov), or (ii) contacting the  
Office of the Clerk of the Court at One  
Bowling Green, New York, New York 10004

**I. Motions to be Heard at the Hearing**

1. Motion for Final Order Pursuant to Bankruptcy Code Sections 105, 361, 362, 363 and 364 (i) Authorizing Secured Post-Petition Financing on a Superpriority Basis; (ii) Approving Agreements Related to the Foregoing; (iii) Modifying Automatic Stay; and (iv) Granting Related Relief.

**Objection Deadline:** September 11, 2009 at 5:00 p.m.

**Objections** None in writing, but subject to ongoing discussions between DIP Lender and US Trustee regarding form of final Order.

**Status** Order to be submitted at continued hearing scheduled for September 23, 2009 at 11:00 a.m.

2. Motion for Final Order Authorizing (i) Continued Use of Existing Cash Management System; (ii) Maintain Existing Bank Accounts and Business Forms, and (iii) Waive Requirements of Section 345(b) of the Bankruptcy Code.

**Objection Deadline:** September 11, 2009 at 5:00 p.m.

**Objections** None

**Status** Order to be submitted at continued hearing scheduled for September 23, 2009 at 11:00 a.m.

3. Motion for Final Order Authorizing Payment of Wages, Compensation and Employee Benefits and (ii) Authorizing Financial Institutions to Honor and Process Checks and Transfers Related to Such Obligations.

**Objection Deadline:** September 11, 2009 at 5:00 p.m.

**Objections** None

**Status** Order to be submitted at continued hearing scheduled for September 23, 2009 at 11:00 a.m.

4. Motion for Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses and Professionals.

**Objection Deadline:** September 11, 2009 at 5:00 p.m.

**Objections** None

**Status** Order to be submitted at continued hearing scheduled for September 23, 2009 at 11:00 a.m.

5. Motion for Order Approving Debtor's Employment of Blank Rome LLP as Counsel to the Debtor

**Objection Deadline:** September 11, 2009 at 5:00 p.m.

**Objections** None in writing but informal concerns and comments of UST have been resolved in the proposed form of Order

**Status** Order to be submitted at continued hearing scheduled for September 23, 2009 at 11:00 a.m.

6. Motion for Order Approving Debtor's Employment of Executive Sounding Board Associates Inc. as Turnaround Consultant for the Debtor

**Objection Deadline:** September 11, 2009 at 5:00 p.m.

**Objections** None in writing but informal concerns and comments of UST have been resolved in the proposed form of Order

**Status** Order to be submitted at continued hearing scheduled for September 23, 2009 at 11:00 a.m.

7. Motion for Order Prohibiting Utilities from Altering, Refusing or Discontinuing Service; (ii) Deeming Utilities Adequately Assured of Future Payment; and (iii) Establishing Procedures for Determining Adequate Assurance of Payment.

**Objection Deadline:** September 11, 2009 at 5:00 p.m.

**Objections** None

**Status** Order to be submitted at continued hearing scheduled for September 23, 2009 at 11:00 a.m.

Dated: New York, New York  
September 21, 2009

Respectfully submitted,

BLANK ROME LLP

/s/ Michael Z. Brownstein

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