

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

UNITED ROAD TOWING, INC. *et al.*,

Debtors.¹

Chapter 11

Case No. 17-10249 (LSS)

(Jointly Administered)

Hearing Date: March 6, 2017 at 11:00 a.m. (ET)
Obj. Deadline: February 27, 2017 at 4:00 p.m. (ET)

Ref. Docket Nos.: 33, 35, 37, 38 & 41

OMNIBUS NOTICE OF PLEADINGS AND HEARING THEREON

PLEASE TAKE NOTICE that, on February 6, 2017, United Road Towing, Inc. and its affiliated debtors, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “Debtors”), filed the following pleadings, among others, with the Court (collectively, the “First Day Pleadings”):²

- Debtors’ Motion for Entry of Interim and Final Orders, Pursuant to Section 105(a) and 366 of the Bankruptcy Code, (i) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Utility Services, (ii) Deeming Utility Companies Adequately Assured of Future Performance, and (iii) Establishing Procedures for Determining Adequate Assurance of Payment [Docket No. 5];
- Debtors’ Motion for Entry of Interim and Final Orders (i) Authorizing the Debtors to Continue Their Surety Bond Program and Pay All Obligations in Respect Thereof, (ii) Authorizing Applicable Banks and Other Financial Institutions to Honor and Process Related Checks and Transfers, and (iii) Granting Related Relief [Docket No. 7]
- Debtors’ Motion for Entry of an Order Authorizing the Debtors to (i) Pay Prepetition Claims of Certain Critical Vendors, (ii) Honor Certain Ordinary

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: United Road Towing, Inc. (6962); URT Holdings, Inc. (8341); City Towing, Inc. (2118); URS West, Inc. (3518); Bill & Wags, Inc. (3518); Export Enterprises of Massachusetts, Inc. (5689); Pat’s Towing, Inc. (6964); Keystone Towing, Inc. (6356); Ross Baker Towing, Inc. (9742); URT Texas, Inc. (3716); Mart Caudle Corporation (1912); Signature Towing, Inc. (3054); WHW Transport, Inc. (3055); URS Southeast, Inc. (7289); URS Northeast, Inc. (7290); URS Southwest, Inc. (7284); Fast Towing, Inc. (5898); E&R Towing and Garage, Inc. (8500); Sunrise Towing, Inc. (7160); Ken Lehman Enterprises, Inc. (1970); United Road Towing of South Florida, Inc. (9186); Rapid Recovery, Inc. (1659); United Road Towing Services, Inc. (2206); Arri Brothers, Inc. (7962); Rancho Del Oro Companies, Inc. (3924); CSCBD, Inc. (2448); URS Leasing, Inc. (9072); UR VMS LLC (4904); UR Vehicle Management Solutions, Inc. (0402). The Debtors’ mailing address is c/o United Road Towing, Inc., 9550 Bormet Drive., Suite 301, Mokena, Illinois 60448.

² The Debtors filed certain motions and applications that were approved on a final basis at the hearing conducted on February 7, 2016 and are not listed herein. See Docket Nos. 30, 32, 34, 36 & 39.

Course Advanced Payment Obligations, and (iii) Granting Related Relief [Docket No. 9];

- Debtors' Motion for an Order, Pursuant to Bankruptcy Code Sections 105(a), 363(b), 503(b), 507(a)(4), and 507(a)(8), and Bankruptcy Rules 6003 and 6004, (a) Authorizing Debtors to (i) Pay Certain Employee Compensation and Benefits and (ii) Maintain and Continue Such Benefits and Other Employee-Related Programs and (b) Authorizing and Directing Banks and Financial Institutions to Honor and Process Checks and Transfers Related to Such Obligations [Docket No. 10];
- Debtors' Motion for Interim and Final Orders (a) Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, and 507 and Fed. R. Bankr. P. 2002, 4001 and 9014 (i) Authorizing Debtors and Debtors in Possession to Obtain Postpetition Financing, (ii) Authorizing Use of Cash Collateral, (iii) Granting Liens and Superpriority Claims, (iv) Granting Adequate Protection to Prepetition Secured Lenders, and (v) Modifying the Automatic Stay, (b) Scheduling a Final Hearing, and (c) Granting Related Relief [Docket No. 12] (the "DIP Motion").

PLEASE TAKE FURTHER NOTICE that a hearing on the First Day Pleadings was held on February 7, 2017, at which time the Court approved the relief requested in each of the above motions on an interim basis, as set forth in the applicable order. *See* Docket Nos. 33, 35, 37, 38 & 41 (each an "Interim Order").

PLEASE TAKE FURTHER NOTICE that a hearing to consider final approval of the First Day Pleadings is scheduled for **March 6, 2017 at 11:00 a.m. (ET)** before the Honorable Laurie Selber Silverstein, in the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 6th Floor, Courtroom 2, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the entry of orders approving the interim relief set forth in the Interim Orders and on a final basis must be filed on or before **February 27, 2017 at 4:00 p.m. (ET)** (the "Objection Deadline") with the United States Bankruptcy Court for the District of Delaware, 3rd Floor, 824 N. Market Street, Wilmington, Delaware 19801. At the same time, copies of any responses or objections must be served so as to be received on or before the Objection Deadline upon the undersigned proposed counsel.

PLEASE TAKE FURTHER NOTICE that in addition to the undersigned proposed counsel, any objections to the DIP Motion must also be served on or before the Objection Deadline upon the following parties: (a) counsel to any official committee appointed in these cases; (b) the Office of the United States Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801, Attn: David Buchbinder, Esq.; (c) counsel for the DIP Agent, Riemer & Braunstein LLP, Times Square Tower, Seven Time Square, Suite 2506, New York, NY 10036, Attn: Steven E. Fox, Esq. and, Ashby & Geddes, P.A., 500 Delaware Avenue, P.O. Box 1150, Wilmington, DE 19899, Attn: Gregory Taylor, Esq.; (d) counsel for the Prepetition Term Agent, Greenberg Traurig, LLP, The Nemours Building, 1007 North Orange Street, Suite 1200, Wilmington, DE 19801, Attn: Dennis A. Meloro, Esq. and, Greenberg Traurig, LLP, 200 Park Avenue, New York, NY 10166, Attn: Maria J. DiConza, Esq.

PLEASE TAKE FURTHER NOTICE that copies of the First Day Pleadings, and any of the related Interim Orders, are available, free of charge, from the website of the Court appointed claims agent, Rust Consulting/Omni Bankruptcy, www.omnimgt.com/unitedroadtowing.

PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS OR RESPONSES TO THE FIRST DAY PLEADINGS ARE TIMELY FILED, SERVED, AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN CONNECTION WITH SUCH FIRST DAY PLEADINGS ON A FINAL BASIS WITHOUT FURTHER NOTICE OR HEARING.

Dated: February 8, 2017
Wilmington, Delaware

YOUNG CONAWAY STARGATT
& TAYLOR, LLP

/s/ M. Blake Cleary
M. Blake Cleary (No. 3614)
Ryan M. Bartley (No. 4985)
Andrew L. Magaziner (No. 5426)
Rodney Square
1000 North King Street
Wilmington, Delaware 19801
Telephone: (302) 571-6600
Facsimile: (302) 571-1253

-and-

WINSTON & STRAWN LLP
Daniel J. McGuire
(admitted *pro hac vice*)
Grace D. D'Arcy
(admitted *pro hac vice*)
35 West Wacker Drive
Chicago, Illinois 60601
Telephone: (312) 558-5600
Facsimile: (312) 558-5700

Carrie V. Hardman
(admitted *pro hac vice*)
200 Park Avenue
New York, New York 10166
Telephone: (212) 294-6700
Facsimile: (212) 294-4700

*Proposed Counsel for Debtors and
Debtors in Possession*