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Proposed Attorneys for Debtors
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re : Chapter 11
Chrysler LLC, *et al.*, : Case No. 09-50002 (AJG)
Debtors. : (Jointly Administered)
-----X

HEARING AGENDA FOR MAY 4, 2009 AT 10:00 A.M.

Location of Hearings: United States Bankruptcy Court for the Southern District of
New York, Alexander Hamilton Custom House, One Bowling
Green, Room 523, New York, New York 10004-1408

I. Introduction and Request for First Day Hearing

1. **"First Day Affidavit" — Affidavit of Ronald E. Kolka Pursuant to Local In Support of First Day Pleadings.**

* **Introductory Presentation**

II. First Day Matters

A. Motions Regarding Administrative and Procedural Matters

2. **"Jones Day Pro Hac Vice" — Motions For Admission to Practice, *Pro Hac Vice*, Under Local Bankruptcy Rule 2090-1(b) (Final Orders);**
3. **"Case Management" — Motion of Debtors and Debtors in Possession, Pursuant to Bankruptcy Rule 1015(c), for an Administrative Order (A) Establishing Case Management and Scheduling Procedures and (B) Scheduling Initial Case Conference (Final Order);**
4. **"Consolidated Lists" — Motion of Debtors and Debtors in Possession, Pursuant to Sections 342 and 521(a) of the Bankruptcy Code, Bankruptcy Rules 1007(a) and 2002(a), (f), (l) and (m) and Local Bankruptcy Rule 1007-1, for an Order (A) Waiving the Requirement that Each Debtor File a List of Creditors, (B) Approving the Form and Manner of Notice of the Commencement of the Debtors' Chapter 11 Cases and (C) Authorizing the Filing of a Consolidated List of Top 50 Unsecured Creditors (Final Order);**
5. **"Epiq Appointment" — Motion of Debtors and Debtors in Possession, Pursuant to Bankruptcy Rule 2002, 28 U.S.C. § 156(c) and Local Bankruptcy Rule 5075-1, for an Order Appointing Epiq Bankruptcy Solutions, LLC as Claims and Noticing Agent (Final Order);**
6. **"Extension for Schedules" — Motion of Debtors and Debtors in Possession, Pursuant to Bankruptcy Rule 1007, for An Order Extending the Time Within Which They Must File Their (A) Schedules of Assets and Liabilities, (B) Schedules of Executory Contracts and Unexpired Leases and (C) Statements of Financial Affairs (Final Order);**
7. **"503(b)(9) Claims" — Motion of Debtors and Debtors in Possession, Pursuant to Sections 105(a) and 503 of the Bankruptcy Code and Bankruptcy Rules 3002 and 3003, for an Order Establishing Procedures for the Assertion of Section 503(b)(9) Claims Relating to Goods Received by the Debtors Within Twenty Days Before the Petition Date (Final Order);**

8. **"Reclamation Claim Procedures"** — Motion of Debtors and Debtors in Possession, Pursuant to Sections 105(a), 362 and 546(c) of the Bankruptcy Code and Bankruptcy Rule 9019(b), for an Interim Order: (A) Establishing Procedures for Resolving Reclamation Claims Asserted Against the Debtors and (B) Granting Certain Related Relief (Interim Order);
9. **"Interim Compensation"** — Motion of Debtors and Debtors in Possession, Pursuant to Sections 105(a) and 331 of the Bankruptcy Code, Bankruptcy Rule 2016(a) and Local Bankruptcy Rule 2016-1, for an Order Establishing Procedures for Interim Monthly Compensation of Professionals (Final Order); **[Adjourned until May 20, 2009]**

B. Motions Regarding Employee Matters

10. **"Workers' Compensation"** — Motion of Debtors and Debtors in Possession, Pursuant to Sections 105(a) and 363(b) of the Bankruptcy Code, for an Order (A) Authorizing the Debtors to (I) Continue Their Existing Workers' Compensation Programs and (II) Pay Certain Prepetition Workers' Compensation Premiums, Claims and Related Expenses; and (B) Granting Certain Related Relief (Final Order).

C. Motions Regarding Commercial Relations

11. **"Confirming Administrative Priority"** — Motion of Debtors and Debtors in Possession For an Order Confirming the Administrative Expense Priority Status of the Debtors' Undisputed and Liquidated Obligations for Postpetition Deliveries of Requested Goods and Provision of Requested Services (Final Order);
12. **"Utilities"** — Motion of Debtors and Debtors in Possession, Pursuant to Section 366 of the Bankruptcy Code, for Interim and Final Orders: (A) Prohibiting Utilities from Altering, Refusing or Discontinuing Services to, or Discriminating Against, the Debtors on Account of Prepetition Invoices; (B) Determining that the Utilities are Adequately Assured of Future Payment; (C) Establishing Procedures for Determining Requests for Additional Assurance; and (D) Permitting Utility Companies to Opt Out of the Procedures Established Herein (Interim Order). **[Adjourned until May 14, 2009]**
13. **"Customer and Dealer Obligations"** — Motion of Debtors and Debtors in Possession, Pursuant to Sections 105(a) and 363(c) of the Bankruptcy Code, For Interim and Final Orders Authorizing the Debtors to Honor or Pay Prepetition Obligations to or for the Benefit of Their Dealers and Other Customers, and for Related Relief (Interim Order);
14. **"Essential Supplier Claims"** — Motion of Debtors and Debtors in Possession, Pursuant to Sections 105(a), 363(b) and 503(b)(9) of the

Bankruptcy Code, for Interim and Final Orders Authorizing Them to Pay the Prepetition Claims of Certain Essential Suppliers and Administrative Claimholders, Continuing the Debtors' Troubled Supplier Program and Granting Certain Related Relief (Interim Order);

15. **"Lienholder Claims"** — Motion of Debtors and Debtors in Possession, Pursuant to Sections 105(a) and 363(b) of the Bankruptcy Code, for an Order Authorizing Them to Pay the Prepetition Claims of Certain Potential Lienholders (Final Order); and

D. Motions Regarding Taxes

16. **"Taxes"** — Motion of the Debtors and Debtors in Possession, Pursuant to Sections 105(a), 363(b), 507(a) and 541 of the Bankruptcy Code, Authorizing Them to Pay Certain Prepetition Taxes (Final Order).

E. Financing

17. **"DIP Financing"** — Motion of Debtors and Debtors in Possession for Interim and Final Orders (A) Authorizing them to Obtain Postpetition Financing; and (B) Granting Adequate Protection to Certain Prepetition Secured Parties (Interim Order).

F. Sale Procedures

18. **"Approval of Sale Procedures"** — Motion of Debtors and Debtors in Possession, Pursuant to Sections 105, 363 and 365 of the Bankruptcy Code and Bankruptcy Rules 2002, 6004 and 6006, for (I) An Order (A) Approving Bidding Procedures and Bidder Protections for the Sale of Substantially All of the Debtors' Assets and (B) Scheduling a Final Sale Hearing and Approving the Form and Manner of Notice Thereof; and (II) an Order (A) Authorizing the Sale of Substantially All of the Debtors' Assets, Free and Clear of Liens, Claims, Interests and Encumbrances, (B) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection Therewith and Related Procedures and (C) Granting Certain Related Relief (Procedures Order).

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Dated: May 1, 2009
New York, New York

Respectfully submitted,

/s/ Corinne Ball
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PROPOSED ATTORNEYS FOR DEBTORS
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