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10 Heller Ehrman LLP

11 UNITED STATES BANKRUPTCY COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
13 SAN FRANCISCO DIVISION

14 In re:

15 HELLER EHRMAN LLP,

16 Post-Confirmation  
17 Liquidating Debtor.

CASE NO.: 08-32514  
Chapter 11

Date: November 4, 2022  
Time: 10:30 a.m.  
Place: Courtroom 17  
Judge: Honorable Dennis Montali

*All court hearings will be conducted via AT&T  
Conference or by Zoom*

18 **NOTICE OF HEARING ON POST-CONFIRMATION LIQUIDATING  
19 DEBTOR'S MOTION FOR AUTHORITY TO EMPLOY BG LAW LLP  
20 AS SPECIAL COUNSEL**

21 **TO ALL INTERESTED PARTIES AND TO THEIR COUNSEL OF RECORD:**

22 **NOTICE IS HEREBY GIVEN** that on November 4, 2022 at 10:30 a.m., or as soon  
23 thereafter as the matter may be heard, in the Courtroom of the Honorable Dennis Montali, United  
24 States Bankruptcy Judge, 450 Golden Gate Avenue, Courtroom 17, San Francisco, CA 94102, the  
25 Court will hear and consider approval of the Post-Confirmation Liquidating Debtor's ("Debtor")  
26 Motion to Employ BG Law LLP as Special Counsel (the "Motion"). In support of the Motion, the  
27 Debtor relies upon the Declarations of Michael F. Burkart and Steven T. Gubner, and the other  
28 pleadings filed in support of the Motion.

The Motion requests an order as follows:

1. The employment of BG Law as the Liquidating Debtor's litigation counsel on the

1 terms and conditions set forth in the Motion, pursuant to 11 U.S.C. § 328, as of June 15, 2022;

2 2. Upon entry of an Order approving the Motion, authorizing the Liquidating Debtor  
3 to pay BG Law a \$100,000.00 Retainer, which amount will be deposited into BG Law's client trust  
4 account to be applied and drawn down upon on a monthly basis as set forth therein;

5 3. Granting such other and further relief as this Court deems just and proper.

6 **NOTICE IS FURTHER GIVEN** that all of the information contained in the Motion is not  
7 set forth in this notice. A copy of the Motion and all supporting papers are a part of the Court's  
8 electronic record, which is the official record of the Court, and can be accessed either through the  
9 e-CalWebPACER information system (see <http://www.canb.uscourts.gov/> - subscription required)  
10 or is available for inspection at computer terminals (printing is available), which are located at the  
11 Office of the Clerk, 450 Golden Gate Avenue, 18<sup>th</sup> Floor, San Francisco, CA 9410.

12 **NOTICE IS FURTHER GIVEN** that under Bankruptcy Local Rule 9014-1(c)(1), a  
13 response, if any, shall be made in writing, served upon the initiating party and filed with the  
14 Bankruptcy Court at least fourteen (14) days prior to the actual scheduled hearing date. If no timely  
15 response is made, the Court may enter an order granting the Motion by default.

16 **NOTICE IS FURTHER GIVEN** that your rights may be affected. You should read these  
17 papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If  
18 you do not have an attorney, you may wish to consult one.

19 If you or your attorney do not take these steps, the Court may decide that you do not oppose  
20 the relief sought in the Motion and may enter an order granting the relief requested.

21 Pursuant to the Bankruptcy Court's *Eighth Amended General Order No. 38 In re:*  
22 *Coronavirus Disease Public Health Emergency*, effective December 1, 2021, and until otherwise  
23 ordered, **all hearings shall be conducted by video or teleconference. The Courtroom will be**  
24 **closed.** All interested parties should consult the Bankruptcy Court's website at  
25 [www.canb.uscourts.gov](http://www.canb.uscourts.gov) for information about court operations during the COVID-19 pandemic.  
26 The Bankruptcy Court's website provides information regarding how to arrange a telephonic or  
27 video appearance. If you have any questions regarding how to appear at a court hearing, you may  
28 contact the Bankruptcy Court by calling 888-821-7606 or by using the Live Chat feature on the

1 Bankruptcy Court's website.

2 DATED: October 7, 2022

FELDERSTEIN FITZGERALD  
WILLOUGHBY PASCUZZI & RIOS LLP

By: /s/ Thomas A. Willoughby  
THOMAS A. WILLOUGHBY  
Attorneys for the Post-Confirmation  
Liquidating Debtor Heller Ehrman LLP

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