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

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In re : Chapter 11

SANTA FE GOLD CORPORATION, et al., : Case No. 15-11761 (MFW)

Debtors.<sup>1</sup> : Joint Administration Requested

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### **NOTICE OF HEARING TO CONSIDER FIRST DAY PLEADINGS**

PLEASE TAKE NOTICE that, on August 26, 2015, Santa Fe Gold Corporation and its affiliated debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the "Debtors") filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101 et seq. (the "Bankruptcy Code") with the Clerk of the United States Bankruptcy Court for the District of Delaware. The Debtors continue to operate their businesses as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

**PLEASE TAKE FURTHER NOTICE** that the Debtors will present the following pleadings (collectively, the "<u>First Day Pleadings</u>") at a hearing scheduled to commence on **August 27, 2015 at 1:30 p.m.** (**ET**) (the "<u>Hearing</u>") before the Honorable Mary F. Walrath, United States Bankruptcy Judge, in the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 5<sup>th</sup> Floor, Courtroom No. 4, Wilmington, Delaware 19801:

The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Santa Fe Gold Corporation (4315); Azco Mica, Inc. (8577); The Lordsburg Mining Company (4474); and Santa Fe Gold (Barbados) Corporation (N/A). The Debtors' mailing address is 1219 Banner Mine Road, Lordsburg, New Mexico 88045.

#### **FIRST DAY PLEADINGS**

- 1. Debtors' Motion for Entry of an Order Directing Joint Administration of the Debtors' Related Chapter 11 Cases [D.I. 3; 8/26/15]
- 2. Debtors' Application for an Order Authorizing the Appointment of American Legal Claim Services, LLC as Claims and Noticing Agent [D.I. 4; 8/26/15]
- 3. Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to (A) Continue Their Existing Cash Management System and (B) Maintain Existing Bank Accounts and Check Stock, (II) Granting an Extension of Time to Comply with Section 345(b) of the Bankruptcy Code, and (III) Authorizing the Debtors to Continue Intercompany Transactions and Granting Administrative Expense Status to Intercompany Claims [D.I. 5; 8/26/15]
- 4. Debtors' Motion for Entry of Interim and Final Orders (I) Prohibiting Utilities from Altering, Refusing, or Discontinuing Services on Account of Pre-Petition Invoices, (II) Deeming Utilities Adequately Assured of Future Performance, and (III) Establishing Procedures for Determining Adequate Assurance of Payment [D.I. 6; 8/26/15]
- 5. Debtors' Motion for Entry of an Order Extending the Deadline to File Schedules and Statements of Financial Affairs [D.I. 7; 8/26/15]
- 6. Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Pay Amounts Attributable to Pre-Petition (A) Wages, Salaries, and Other Compensation; (B) Reimbursable Employee Expenses; and (C) Employee Benefits; (II) Authorizing the Debtors to Continue Their Existing Employee Compensation and Benefits Programs Post-Petition; and (III) Granting Related Relief [D.I. 8; 8/26/15]
- 7. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Obtain Post-Petition Financing, (II) Authorizing the Use of Cash Collateral, (III) Granting Liens, including Priming Liens, and Superpriority Claims, (IV) Granting Adequate Protection, (V) Scheduling a Final Hearing, and (VI) Granting Related Relief [D.I. 9; 8/26/15]

PLEASE TAKE FURTHER NOTICE that copies of each First Day Pleading will be mailed to you subsequent to the Hearing and are currently available on the website of the Debtors' proposed claims and noticing agent, American Legal Claim Services, LLC, <a href="https://www.americanlegal.com/santafegold">www.americanlegal.com/santafegold</a>, and on the Court's website, <a href="https://www.deb.uscourts.gov">www.deb.uscourts.gov</a>. If you would like to receive copies of any First Day Pleading prior to the Hearing, you may contact Troy Bollman, Paralegal, at (302) 573-7796 or <a href="mailto:tbollman@ycst.com">tbollman@ycst.com</a>. All parties wishing to

participate in the Hearing telephonically must make arrangements with Court Call ((866) 582-6878; www.courtcall.com) prior to the Hearing.

Dated: August 26, 2015 Wilmington, Delaware

## YOUNG CONAWAY STARGATT & TAYLOR, LLP

#### /s/ Ian J. Bambrick

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