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9 UNITED STATES BANKRUPTCY COURT
 10 EASTERN DISTRICT OF CALIFORNIA
 11 SACRAMENTO DIVISION
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13 In re:
 14 CITY OF STOCKTON, CALIFORNIA,
 15 Debtor.

Case No. 2012-32118
 D.C. No. OHS-8
 Chapter 9

**MOTION FOR ORDER SHORTENING
 NOTICE ON MOTION FOR ORDER
 (1) FIXING AUGUST 16, 2013 BAR
 DATE FOR ALL CLAIMS OTHER
 THAN CLAIMS BASED ON RETIREE
 HEALTH BENEFITS, (2) APPROVING
 FORM OF NOTICE OF BAR DATE
 AND (3) REQUIRING CITY TO
 PUBLISH AND TRANSMIT NOTICE
 OF BAR DATE TO CREDITORS AND
 PARTIES IN INTEREST BY NO
 LATER THAN JUNE 28, 2013**

Date: June 12, 2013
 Time: 3:00 p.m.
 Dept: Courtroom 35
 Judge: Hon. Christopher M. Klein

1 The City of Stockton, California (the “City”), the debtor in the above-captioned case,
2 respectfully moves the Court (by this “Motion”) for entry of an order shortening the notice period
3 for the hearing on the City’s Motion For Order (1) Fixing August 16, 2013 Bar Date For All
4 Claims Other Than Claims Based On Retiree Health Benefits, (2) Approving Form Of Notice Of
5 Bar Date And (3) Requiring City To Publish And Transmit Notice Of Bar Date To Creditors And
6 Parties In Interest By No Later Than June 28, 2013 (the “Bar Date Motion,” establishing August
7 16, 2013 as the “Bar Date”), which motion the City is filing concurrently. Pursuant to Local Rule
8 9014-1(f)(3), the Court can, for good cause shown, order that the amount of notice for a hearing
9 be shortened to fewer than 14 days. The City respectfully represents that good cause exists to
10 shorten notice of the hearing on the Bar Date Motion by one day, from 14 days to 13 days.

11 At a status conference on April 24, 2013, the Court set another status conference on June
12 12, 2013 at 3:00 p.m. Since April 24, the City has conferred with the parties in this case
13 regarding the setting of a bar date. The Court is required to fix a bar date pursuant to Federal
14 Rule of Bankruptcy Procedure 3003(c). The City has prepared a proposed notice of Bar Date and
15 circulated it to many of the City’s creditors for review; at this time, the so-called Capital Markets
16 Creditors, the Indenture Trustee for the City’s debt instruments, and the Official Committee of
17 Retirees have reviewed, suggested revisions to, and approved the City’s proposed notice of Bar
18 Date.

19 The time spent soliciting and incorporating revisions to the proposed notice of Bar Date
20 resulted in the City now seeking this order to shorten the notice period by one day, from 14 days
21 to 13 days. It also constitutes good cause to shorten the notice period, because the City believes
22 that it preserved time and resources by obtaining creditor approval of the Bar Date notice prior to
23 submitting the notice for the Court’s review.

24 For the foregoing reasons, the City believes that cause exists to grant the City an order
25 shortening the notice period on the Bar Date Motion such that the Bar Date Motion will be heard

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1 on June 12, 2013, at 3 p.m.

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3 Dated: May 30, 2013

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By: /s/ Marc A. Levinson
MARC A. LEVINSON
Attorneys for Debtor
City of Stockton

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