

SRF 34038

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

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In re:	§	Chapter 11
MONITRONICS INTERNATIONAL, INC., <i>et al.</i> ,	§	Case No. 19-33650 (DRJ)
Debtors. <sup>1</sup>	§	(Joint Administration Requested)
	§	(Emergency Hearing Requested)
	§	

**DEBTORS' REQUEST FOR EMERGENCY CONSIDERATION  
OF CERTAIN "FIRST DAY" MATTERS**

On June 30, 2019, the above-captioned debtors and debtors in possession (collectively, the "**Debtors**") filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of Texas (the "**Court**"). Proposed counsel for the Debtors believes that these cases qualify as "Complex Chapter 11 Cases." The Debtors need emergency consideration of the following initial case matters:

1. Declaration of Fred A. Graffam III, Chief Financial Officer and Senior Vice President of the Debtors, in Support of the Chapter 11 Petitions and First Day Pleadings [Docket No. 17];
2. Debtors' Emergency Motion for Entry of an Order (I) Directing Joint Administration of Chapter 11 Cases and (II) Granting Related Relief [Docket No. 2];
3. Notice of Designation as Complex Chapter 11 Bankruptcy Case [Docket No. 3];
4. Debtors' Emergency Motion for Entry of Order Authorizing the Debtors to File a Consolidated Creditor Matrix and List of the 30 Largest Unsecured Creditors [Docket No. 4];

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Monitronics International, Inc. (9343), Security Networks LLC (8893), MIBU Servicer Inc. (5978), LiveWatch Security, LLC (3274), Platinum Security Solutions, Inc. (3850), Monitronics Canada, Inc. (9545), MI Servicer LP, LLC (N/A), Monitronics Security LP (6524), and Monitronics Funding LP (6754). The location of the Debtors' corporate headquarters and the Debtors' service address is: 1990 Wittington Place, Farmers Branch, Texas 75234.

5. Debtors' Emergency Motion for Entry of Order (I) Authorizing Payment of Certain Prepetition Workforce Obligations, Including Compensation, Expense Reimbursements, Benefits, and Related Obligations, (II) Confirming Right to Continue Workforce Programs on Postpetition Basis, (III) Authorizing Payment of Withholding and Payroll-Related Taxes, (IV) Confirming the Debtors' Authority to Transmit Payroll Deductions, (V) Authorizing Payment of Prepetition Claims Owing to Third Party Call Centers, (VI) Authorizing Payment of Prepetition Claims Owing to Administrators of Workforce Programs, and (VII) Authorizing Banks to Honor Prepetition Checks and Fund Transfers for Authorized Payments [Docket No. 5] ("**Wages Motion**");
6. Debtors' Emergency Motion for Entry of Order Authorizing (I) the Payment of Prepetition Claims of Certain Dealers and (II) the Continuation of Certain Dealer Programs Postpetition [Docket No. 6] ("**Dealers Motion**");
7. Debtors' Emergency Motion for Entry of Order Authorizing (I) the Payment of Prepetition Trade Claims of Certain Creditors in the Ordinary Course of Business and (II) Banks to Honor Prepetition Checks and Fund Transfers for Authorized Payments [Docket No. 7] ("**All Trade Motion**");
8. Debtors' Emergency Motion for Entry of Order Authorizing the Payment of Certain Prepetition and Postpetition Taxes and Fees [Docket No. 8] ("**Taxes Motion**");
9. Debtors' Emergency Motion for Entry of Order Authorizing the (I) Payment of Prepetition Insurance and Security Program Obligations, (II) Maintenance of Postpetition Insurance Coverage, and (III) Continuation Of Security Program [Docket No. 9] ("**Insurance Motion**");
10. Debtors' Emergency Motion for Entry of Order (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Services, and (III) Approving the Debtors' Proposed Procedures for Resolving Additional Assurance Requests [Docket No. 10] ("**Utilities Motion**");
11. Debtors' Emergency Motion for Entry of Order Authorizing the Debtors to Continue to (I) Operate their Cash Management System, (II) Use Existing Checks and Business Forms, and (III) Honor Certain Intercompany Arrangements [Docket No. 11] ("**Cash Management Motion**");
12. Debtors' Emergency Application for Entry of an Order Authorizing the Employment and Retention of Prime Clerk LLC as Claims, Noticing, and Solicitation Agent [Docket No. 12] ("**Prime Clerk Retention Application**");
13. Debtors' Emergency Motion for Entry of an Order (I) Scheduling Combined Hearing on (A) Adequacy of Disclosure Statement and (B) Confirmation of Plan; (II) Fixing Deadline to Object to Disclosure Statement and Plan; (III) Approving (A) Solicitation Procedures, (B) Form and Manner of Notice of Commencement, Combined Hearing, and Objection Deadline, (C) Cash Opt Out Election Form, (D) Notice of Non-Voting Status and Opt Out Opportunity, and (E) Rights Offering Materials; (IV) Approving Procedures

for Assumption of Contracts and Leases and Form and Manner of Cure Notice; (V) Conditionally Approving Disclosure Statement; (VI) Conditionally (A) Directing the United States Trustee Not to Convene Section 341 Meeting of Creditors and (B) Waiving Requirement of Filing Statements of Financial Affairs and Schedules of Assets and Liabilities; and (VII) Granting Related Relief [Docket No. 13] ("**Solicitation Procedures Motion**"):

14. Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Use of Cash Collateral, (III) Granting Liens and Superpriority Administrative Expense Status, (IV) Granting Adequate Protection, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing and (VII) Granting Related Relief [Docket No. 14] ("**DIP Motion**"); and
15. Debtors' Emergency Motion for Entry of Order Authorizing the Debtors to File the Fee Letters Under Seal [Docket No. 15].

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Dated: June 30, 2019  
Houston, Texas

Respectfully submitted,

/s/ Timothy A. ("Tad") Davidson II

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*Proposed Co-Counsel for the Debtors and  
Debtors in Possession*

**CERTIFICATE OF SERVICE**

I certify that on July 1, 2019, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on those parties registered to receive electronic notices.

*/s/ Timothy A. ("Tad") Davidson II* \_\_\_\_\_

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