

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

In re:

LANG HOLDINGS, INC.,
a Delaware Corporation,

Debtor.

Chapter 11

Case No. 09- 12543 ()

In re:

TURNER ACQUISITION, INC.,
a Delaware Corporation,

Debtor.

Chapter 11

Case No. 09- 12544 ()

In re:

AVALANCHE PUBLISHING
ACQUISITION, INC.,
a Delaware Corporation,

Debtor.

Chapter 11

Case No. 09- 12545 ()

In re:

THE LANG COMPANIES, LLC,
a Delaware Limited Liability Company,

Debtor.

Chapter 11

Case No. 09- 12546 ()

In re:

AVALANCHE PUBLISHING, INC.,
a California Corporation,

Debtor.

Chapter 11

Case No. 09- 12547 ()

In re:

THE LANG STORE, LTD.,
a Wisconsin Corporation,

Debtor.

Chapter 11

Case No. 09- 12548 ()

**DEBTORS' MOTION FOR ORDER PURSUANT TO FED. R. BANKR. P. 1015(b)
AND DEL. BANKR. L.R. 1015-1 DIRECTING JOINT ADMINISTRATION OF CASES**

Lang Holdings, Inc., and its affiliated debtors and debtors in possession in the above-captioned cases (collectively, the "Debtors"),¹ hereby move (the "Motion") for entry of order pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Rule 1015-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "Local Rules") directing joint administration of the Debtors' cases for procedural purposes only. In support of this Motion, the Debtors rely upon the Declaration of Laurie Gilner in Support of Chapter 11 Petitions and First Day Relief (the "Gilner Declaration"), filed concurrently herewith. In support of the Motion, the Debtors respectfully represent as follows:

JURISDICTION

1. The Court has jurisdiction over these chapter 11 cases and this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue of these chapter 11 cases and this Motion is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The legal predicates for the relief requested herein are Bankruptcy Rule 1015 and Local Rule 1015-1.

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Lang Holdings, Inc. (9551); Turner Acquisition, Inc. (2115); Avalanche Publishing Acquisition, Inc. (3038); The Lang Companies, LLC (9182); Avalanche Publishing, Inc. (9793); and The Lang Store, Ltd. (2398). The mailing address of each of the Debtors is 514 Wells Street, Delafield, Wisconsin 53018.

BACKGROUND

2. On the date hereof (the "Petition Date"), the Debtors each commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code. The Debtors are authorized to continue to operate their business and manage their properties as debtors in possession pursuant to Bankruptcy Code sections 1107(a) and 1108.

3. No request for appointment of a chapter 11 trustee or examiner has been made and, as of the date hereof, no official committee has been appointed.

4. Information regarding the Debtors' history and business operations, their capital structure and primary secured indebtedness, and the events leading up to the commencement of these chapter 11 cases can be found in the Gilner Declaration, which is incorporated herein by reference.

RELIEF REQUESTED

5. By this Motion, each of the Debtors move for the joint administration, for procedural purposes only, of their respective cases contemporaneous with the filing of their voluntary petitions. The Debtors submit that joint administration, for procedural purposes only, is in the best interests of each of the Debtors' estates and will ease the administrative burden on their creditors, this Court and other interested parties.

6. Bankruptcy Rule 1015(b) provides that if two or more petitions for relief are pending in the same court by or against a debtor and its affiliate, the court may order joint administration of the cases. Each of the Debtors is a direct or indirect subsidiary of Lang Holdings, Inc. Therefore, pursuant to the definition of "affiliate" in section 101(2) of the Bankruptcy Code, as used in Bankruptcy Rule 1015(b), the Debtors are affiliates. Accordingly, the joint administration, for procedural purposes only, of the Debtors' chapter 11 cases is appropriate under Bankruptcy Rule 1015(b).

7. Moreover, the Debtors' financial affairs and business operations are related, and joint administration will ease the administrative burden on the Court and all parties in interest. Additionally, many of the motions, hearings and orders in the Debtors' chapter 11 cases will affect each Debtor and its estate. Joint administration will reduce fees and costs and avoid the need for filing duplicative documents in the Debtors' various cases.

8. In order to optimally and economically administer the Debtors' pending chapter 11 cases, the Debtors' cases should be jointly administered, for procedural purposes only, under the case number assigned to Lang Holdings, Inc. Joint administration will not adversely affect the rights of the creditors of each of the respective Debtors because this Motion only requests the administrative consolidation of the Debtors' estates. Accordingly, any creditor may still file a claim against any particular Debtor and its estate, or against any combination of Debtors and their respective estates. Thus, joint administration will enhance the rights of all creditors by enabling the Clerk of the Court to utilize a single docket and combine notices to creditors of the Debtors' respective estates and other parties in interest, without impacting such parties' substantive rights.

9. Joint administration also will enable participants in these cases to more easily apprise the various parties in interest of the matters before the Court in all of the Debtors' chapter 11 cases. Further, joint administration will relieve the Court of the burden of entering duplicative orders and maintaining duplicative files and will simplify the Office of the United States Trustee's (the "U.S. Trustee") supervision of the Debtors' chapter 11 cases. For these reasons, joint administration of the Debtors' chapter 11 cases, for procedural purposes only, will best serve the interests of the Debtors, their creditors and other parties in interest.

10. The Debtors request that the Court modify the caption of the Debtors' chapter 11 cases to reflect their joint administration as follows:

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FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
)	
LANG HOLDINGS, INC.,)	Case No. 09- <u>12543</u> ()
a Delaware Corporation, <u>et al.</u> , ¹)	
)	Jointly Administered
Debtors.)	
)	

11. The Debtors further request that the Clerk of the Court enter a docket entry in each of the above-captioned cases substantially as follows:

“An Order has been entered in this case under Rule 1015(b) of the Federal Rules of Bankruptcy Procedure directing the joint administration of the chapter 11 cases of Lang Holdings, Inc., Turner Acquisition, Inc., Avalanche Publishing Acquisition, Inc., The Lang Companies, LLC, Avalanche Publishing, Inc. and The Lang Store, Ltd. The docket of Lang Holdings, Inc., Case No. 09-_____ should be consulted for all matters affecting this chapter 11 case.”

12. The entry of joint administration orders in multiple related cases such as these is common in this District. See, e.g., In re Smurfit Stone Container Corp., Case No. 09-10235 (BLS) (Bankr. D. Del. Jan. 27, 2009) (order directing joint administration of chapter 11 cases); In re Merisant Worldwide, Inc., Case. No. 09-10059 (PJW) (Bankr. D. Del. Jan. 13, 2009) (same); In re Tribune Co., Case No. 08-13141 (KJC) (Bankr. D. Del. Dec. 10, 2008) (same); In re Eclipse Aviation Corp., Case No. 08-13031 (Bankr. D. Del. Nov. 26, 2008) (MFW)

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Lang Holdings, Inc. (9551); Turner Acquisition, Inc. (2115); Avalanche Publishing Acquisition, Inc. (3038); The Lang Companies, LLC (9182); Avalanche Publishing, Inc. (9793); and The Lang Store, Ltd. (2398). The mailing address of each of the Debtors is 514 Wells Street, Delafield, Wisconsin 53018.

(same); In re Pierre Foods, Inc., Case No. 08-11480 (KG) (Bankr. D. Del. July 16, 2008) (same);

In re Diamond Glass, Inc., Case No. 08-10601 (Bankr. D. Del Apr. 2, 2008) (CSS) (same).

Accordingly, based on the foregoing facts and authorities, the Debtors submit that the relief requested herein should be granted.

NOTICE

13. The Debtors will provide notice of this Motion to: (i) the Office of the United States Trustee; (ii) the Debtors' thirty (30) largest unsecured creditors on a consolidated basis; (iii) the Debtors' prepetition secured lenders; and (iv) the Debtors' banks. Notice of this Motion and any order entered with respect thereto will be served in accordance with Local Rule 9013-1(m). In light of the nature of the relief requested herein, the Debtors submit that no other or further notice is necessary.

CONCLUSION

WHEREFORE, the Debtors respectfully request that the Court enter an order, substantially in the form attached hereto, granting the Motion and such other and further relief as is just and proper.

Dated: Wilmington, Delaware
July 16, 2009

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