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U.S. BANKRUPTCY COURT  
PATRICIA GRAY, CLERK

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Attorneys for the Debtors and  
Debtors-in-Possession

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEVADA

In re Case No. BK-N- 01-31627  
(Chapter 11)

WASHINGTON GROUP  
INTERNATIONAL, INC., et al.,  
Debtors.

**ORDER ESTABLISHING  
CERTAIN NOTICE, CASE  
MANAGEMENT, AND  
ADMINISTRATIVE PROCEDURES**

Hearing Date: May 14, 2001  
/ Hearing Time: 9:30 a.m.

Upon the motion dated May 13, 2001 (the "Motion"),<sup>1</sup> of  
the above-captioned debtors and debtors-in-possession  
(collectively, the "Debtors"), for an order establishing certain  
notice, case management, and administrative procedures; and upon

<sup>1</sup> Capitalized terms not defined herein shall have the  
meaning ascribed to them in the Motion.

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the Affidavit of Stephen G. Hanks in Support of Chapter 11 Petitions and First Day Orders, sworn to on May 13, 2001; and this Court having determined that the relief requested is in the best interest of the Debtors' estates and their creditors; and it also appearing that the relief requested will enhance the Debtors' ability to operate as debtors-in-possession; and it further appearing that proper and adequate notice having been given and that no other or further notice is necessary; and upon the record of the hearing held in this Court on May 13, 2001; and after due deliberation thereon; and good and sufficient cause appearing therefore, it is hereby ORDERED, ADJUDGED AND DECREED THAT:

**WEBSITE**

1. The Debtors shall, and have, established a website for posting pleadings and other documents they file in this case (the "Website"). The Debtors' Website is [www.wgint.com](http://www.wgint.com).

**APPEARANCES**

2. When any party files a notice of appearance, the notice must include the party's email address. If the party making a notice of appearance does not include an email address, the Debtors will send a notice requesting that the party provide an email address for service purposes. Thereafter, when the Debtors file and serve a Filing (as defined below), as soon as practicable after such filing, the Debtors shall post such Filing on the Website and send an email to all parties who have made a

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notice of appearance (to the extend such email address was supplied) stating that the Filing has been posted on the Debtors' Website. For purposes of notice, a Filing served in the above-described manner shall be deemed to have been actually received on the date that the party serving the Filing notifies such recipient by email that the Filing has been posted on the Website, and, thus, no additional time for mailing will be added under Bankruptcy Rule 9006(f).

**NOTICE**

3. Every notice, motion or application, and all briefs, memoranda, affidavits, declarations or other documents filed concurrently in support thereof in these cases (collectively, "Filings") shall, unless otherwise approved by the Court, be subject to the notice procedures described herein (the "Notice Procedures"), which Notice Procedures are hereby implemented and approved pursuant to sections 102 and 105 of the Bankruptcy Code and Bankruptcy Rules 2002(m) and 9007.

4. All Filings shall be filed with the Court in accordance with regular Court procedures.

5. Any entity, including the Debtors, submitting any Filing to the Court shall also, on the day the Filing is submitted with the Court, provide one copy of the Filing to Sierra Legal Duplicating ("Sierra") (Address: 124 West Taylor Street, P.O. Box 2452, Reno, NV 89505-2452, telephone number: (775) 786-8224, facsimile number: (775) 786-1214)). Sierra

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shall act as the official copy service (the "Official Copy Service") in these cases as further described below.

6. Sierra shall monitor the docket in these cases and coordinate with Debtors' counsel to ensure that Sierra has copies of all Filings in the Debtors' cases.

7. In addition to Sierra, all Filings in these cases shall be served by overnight delivery, facsimile or hand delivery on the following list of parties-in-interest (the "Master Service List"), which may be amended upon written request for good and sufficient cause, in accordance with the procedures set forth in this Order:

- (a) Counsel to the Debtors;
- (b) The Office of the United States Trustee;
- (c) Counsel to any official committee(s) established in these cases pursuant to section 1102 of the Bankruptcy Code;
- (d) Counsel to the agent to the Debtors' prepetition and postpetition lenders;
- (e) All Nevada counsel filing a notice of appearance in these cases; and
- (f) Those parties that may be added to the Master Service List upon written request to the Debtors and the committee(s) or as ordered by the Court for good and sufficient cause. Further filings shall be served on any entity having a particularized interest in the subject of the Filing.

8. Additionally, all Filings, complaints and other pleadings filed in any adversary proceeding commenced in these cases (the "Adversary Pleadings") shall be served on (a)-(d) above as well as any persons required to be served under any

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3 applicable Bankruptcy Rule or Local Rules, and one copy provided  
4 to Sierra.

5 9. All Filings for which particular notices are  
6 required by Bankruptcy Rules 2002(a)(2) and (3), 4001, 6004,  
7 6006, 6007 or 9019 shall be served on the Master Service List and  
8 in accordance with the following procedures, unless otherwise  
9 ordered by the Court:

- 10 (a) Filings related to the use, sale, lease or  
11 abandonment of property other than in the  
12 ordinary course of business shall be served on  
13 each entity having an interest in the  
14 property.
- 15 (b) Filings related to relief from, or otherwise  
16 related to, the automatic stay shall be served  
17 on each entity having a lien or encumbrance on  
18 the affected property.
- 19 (c) Filings relating to the use of cash collateral  
20 or obtaining credit shall be served on each  
21 entity with an interest in the cash collateral  
22 or each entity with a lien or other interest  
23 in property on which a lien is proposed to be  
24 granted.
- 25 (d) Filings relating to approval of proposed  
26 compromises or settlements shall be served on  
27 any entity that is a party to the compromise  
28 or settlement or which may be adversely  
affected thereby.
- (e) Filings relating to rights under section 365  
of the Code shall be served on each party to  
the executory contract(s) or unexpired  
lease(s) affected thereby.
- (f) Notice of other matters for which the  
Bankruptcy Rules require notice to all parties  
in interest shall be served on all creditors  
and equity security holders of the Debtors and  
parties in interest, unless otherwise  
authorized by this Court.

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10. Unless otherwise authorized by this Court, the noticing procedures set forth above shall not apply to notices of the matters or proceedings described in the following Bankruptcy Rules:

- (a) Bankruptcy Rule 2002(a)(1) (any meetings of creditors pursuant to section 341 of the Bankruptcy Code).
- (b) Bankruptcy Rule 2002(a)(2) (any proposed use, sale or lease of property of the estate other than in the ordinary course of business, to the extent that such use, sale or lease concerns all or substantially all of the Debtors' assets).
- (c) Bankruptcy Rule 2002(a)(3) (the hearing on approval of a compromise or settlement of a controversy other than approval of an agreement pursuant to Bankruptcy Rule 4001(d)(1), to the extent that such compromise or settlement either involves claims between and among the Debtors and the Official Committee of Unsecured Creditors or a plan of reorganization).
- (d) Bankruptcy Rule 2002(a)(4) (a hearing on the dismissal of the case or cases, or the conversion of the case or cases to another chapter).
- (e) Bankruptcy Rule 2002(a)(5) (the time fixed to accept or reject a proposed modification of a plan of reorganization).
- (f) Bankruptcy Rule 2002(b)(1) (the time fixed for filing objections and any hearing to consider approval of a disclosure statement).
- (g) Bankruptcy Rule 2002(b)(2) (the time fixed for filing objections and any hearing to consider confirmation of a plan of reorganization).
- (h) Bankruptcy Rule 2002(d) (certain matters for which notice is to be provided to equity security holders).
- (i) Bankruptcy Rule 2002(f)(1) (the entry of an order for relief).

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- (j) Bankruptcy Rule 2002(f)(2) (the dismissal or conversion of a case to another chapter of the Bankruptcy Code).
- (k) Bankruptcy Rule 2002(f)(5) (the time fixed for filing a complaint to determine the dischargeability of a debt pursuant to section 523 of the Bankruptcy Code, as provided in Bankruptcy Rule 4007).
- (l) Bankruptcy Rule 2002(f)(6) (the waiver, denial or revocation of a discharge as provided in Bankruptcy Rule 4006).
- (m) Bankruptcy Rule 2002(f)(7) (the entry of an order confirming a chapter 11 plan or plans of reorganization).
- (n) Bankruptcy Rule 2002(f)(8) (a summary of the trustee's final report and account, should a case be converted to chapter 7 of the Bankruptcy Code).

All the foregoing matters or proceedings set forth in this paragraph 10 of this Order shall be noticed in accordance with the applicable provisions of Bankruptcy Rule 2002; provided, however, that nothing in this Order shall prejudice (i) the rights of any party in interest to move the Court to further limit or expand notice of such matters and proceedings upon a showing of good cause, including, but not limited to, the right to file a motion seeking emergency ex parte consideration or consideration upon shortened time; or (ii) the rights of any party to seek an enlargement or reduction of a time period under Bankruptcy Rule 9006(b) or (c).

11. All requests, whether now filed or filed in the future, for automatic receipt of copies of Filings are denied except as set forth herein. Sierra in its capacity as the

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Official Copy Service will maintain (or have access to) a complete set of all documents filed in these cases henceforth. Upon request of any person, Sierra will supply a copy of any designated document, at a cost to be paid by the person requesting it at the prevailing fee being charged by Sierra. Any party that desires copies of every Filing in these cases may obtain such Filings at their own expense by arrangement with Sierra. Credit arrangements with Sierra can be made by contacting Sierra at the address and telephone number identified above.

12. On the last day of each calendar month, or as soon thereafter as is practicable, a copy of this Order, as it may be modified or amended from time to time, shall be served by the Debtors on each party (the "2002 List Parties") that filed a notice of appearance or a request for notice in these cases during the preceding month.

13. Any entity submitting a Filing (other than the Debtors who must post filings on the Website) shall serve a notice of such Filing, which notice shall include, (i) the title of the Filing, (ii) the time and date of any objection deadline with respect to the Filing, (iii) the time and date of the scheduled hearing related to the Filing, and (iv) a brief description of the substance of the filing on all 2002 List Parties.

14. Notice given in accordance with the Notice Procedures shall be deemed adequate pursuant to the Bankruptcy

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Code, the Bankruptcy Rules and the Local Rules of the United States District Court for the District of Nevada and for the United States Bankruptcy Court for the District of Nevada.

15. Parties who file notices of appearance and who desire to be added to the Master Service List should make a written request to that effect to the Debtors; provided, however, that Nevada counsel who have filed a notice of appearance shall automatically be added to the Master Service List pursuant to Paragraph 5(f) without the need to make a written request to that effect. In the written request, the requesting party shall advise the Debtors of the party's interest in the bankruptcy cases and why cause exists for the party's inclusion on to the Master Service List. The Debtors shall have twenty (20) business days from receipt of such a request to consider such a request. If the Debtors decline the request or fail to respond to the same within such 20-day period, the requesting party may then move the Court in accordance with the Notice Procedures, for good cause shown, to be added to the Master Service List.

16. The Debtors shall post the Master Service List on their website, and shall update such list as required.

**Scheduled Omnibus Hearing Dates**

17. On the dates listed below (each individually, a "Scheduled Omnibus Hearing Date"), the Court shall hear all matters, that have been filed and served in accordance with the provisions of this Order.

*Parties must contact the calendar clerk at (775) 784-5023 (ext. 111 or 110) to reserve any of the following dates:*  
June 13, 2001 at 9:30 a.m.

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June 25, 2001 at 9:30 a.m. (2.5 hours)

July 9, 2001 at 2:00 p.m. (3 hours)

July 24, 2001 at 9:30 a.m.  
(Proposed Disclosure Statement Hearing)

August 3, 2001 9:30 a.m. (Full Day)

August 13, 2001 at 2:00 p.m. (3 hours)

August 27, 2001 at 2:00 p.m. (3 hours)

September 6, 2001 at 9:30 a.m.  
(Proposed Confirmation Hearing)

Additional hearings shall be scheduled as provided by further Order of the Court. *The Court reserves the right to determine the number of hearings and the time allotted for each hearing on any specific date.*

**MOTIONS**

18. All motions are hereby classified into three categories: (i) motions filed 21 or more days prior to the Scheduled Hearing Date ("Standard Motions"); (ii) motions filed less than 21 days, but more than seven business days before the Scheduled Hearing Date ("Expedited Motions"); and (iii) motions filed within seven business days of the date on which the hearing on such motion is to occur ("Emergency Motions"). Notwithstanding LR 9014, with respect to these motions, filing and service of notices and all related moving papers with respect thereto shall be deemed adequate and sufficient if in compliance with the following procedures:

(a) **Standard Motions:** Notice of Standard Motions and all related moving papers shall be filed and delivered by the 21st calendar day before the Scheduled Hearing Date. All answers, objections or other responsive pleadings shall be filed and delivered not later than seven business days before the

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3 Scheduled Hearing Date. Failure to file such an answer,  
4 objection, or other responsive pleading within the period of time  
5 specified in the foregoing sentence shall be deemed a waiver of  
6 any objection and the right to be heard thereon, except upon  
7 motion to the Court and cause shown. Any reply papers shall be  
8 filed and delivered no later than two business days before the  
9 Scheduled Hearing Date.

10 (b) **Expedited Motions:** Each Expedited Motion shall  
11 demonstrate good cause for the movant's being entitled to relief  
12 *An Attorney Information Sheet will be required.* Movant shall deliver  
13 Notice of Expedited Motions and all moving papers on the next  
14 business day after the date such Expedited Motion is filed, but  
15 not later than seven business days prior to the Scheduled Hearing  
16 Date. All answers, objections, or other responsive pleadings  
17 shall be filed and delivered within seven calendar days after the  
18 filing of the Expedited Motion, but in no event shall responsive  
19 papers be filed and delivered less than three calendar days  
20 before the Scheduled Hearing Date. Failure to file such an  
21 answer, objection, or other responsive pleading within the period  
22 of time specified in the foregoing sentence shall be deemed a  
23 waiver of any objection and the right to be heard thereon, except  
24 upon motion to the Court and cause shown. Any reply papers shall  
25 be filed and delivered no later than one business day before the  
26 Scheduled Hearing Date.

27 (c) **Emergency Motions:** Each Emergency Motion shall  
28 demonstrate good cause for the movant's being entitled to relief

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upon less than seven business days notice. Accordingly, movant shall plead, and counsel for the movant shall so certify, with specificity, the basis for emergency relief and the nature of the serious, irreparable harm that would result if a hearing on the matter was delayed until the next Scheduled Hearing Date. Unless otherwise permitted by the Court, each Emergency Motion shall be accompanied by an "Attorney Information Sheet for Proposed Order Shortening Time" or similar statement indicating the following:

(1) whether opposing counsel and other interested parties and persons were provided notice; (2) whether opposing counsel or other persons consent to a hearing on shortened time; (3) the date counsel or other persons were provided notice; and (4) how notice was provided, or if not provided, how the moving party attempted to provide notice. On the same day that movant files an Emergency Motion, the movant shall serve such Emergency Motion and all corresponding moving papers by telefax or personal service upon the Debtors, attorneys for the Debtors, the Office of the United States Trustee, counsel for any committees appointed in these cases, counsel for the Debtors' pre and postpetition lenders and any parties against whom relief is sought. Notice of the Emergency Motion shall be served on the Master Service List by overnight courier or overnight express mail delivery (excluding Sunday delivery) so that the Master Service List receives such Notice the calendar day following (excluding Sundays) the filing of the Emergency Motion.

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Responses to an Emergency Motion may be made at the hearing on such Emergency Motion.

19. All Standard Motions and Expedited Motions with respect to which no answers, objections, or other responsive pleadings are filed within the requisite period of time, shall be deemed unopposed. In such event and unless otherwise ordered by the Court, no hearing shall be held to consider the merits of such unopposed Motion, and the Court may enter an Order granting the requested relief.

20. Service of any moving, responsive, or reply papers shall be deemed timely if delivered by 4:30 p.m. Prevailing Pacific Time on the appropriate business day as set forth above. Service of moving, responsive, or reply papers shall be deemed sufficient and adequate if made by telefax or email within the requisite time periods.

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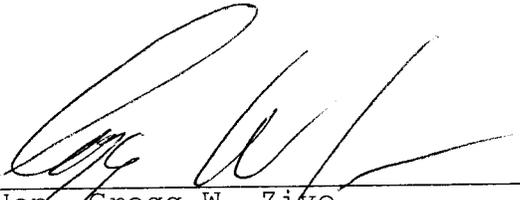
**PROOFS OF CLAIM**

21. All proof of claim forms shall be filed with the Debtors' claims agent, Berger & Associates, LLC ("Berger"), at the following address:

Washington Group International, Inc.  
c/o Robert L. Berger & Associates, LLC  
PMB 1007  
10351 Santa Monica Blvd.  
Suite 101 A  
Los Angeles, CA 90025

Proof of claim forms shall not be filed with the Court. Berger is authorized and directed to maintain the proof of claim forms for these cases as provided in the Order Appointing Robert L. Berger & Associates, LLC As Claims, Noticing and Balloting Agent of the Bankruptcy Court Pursuant to 28 U.S.C. § 156(c), executed on May 14, 2001.

DATED: Reno, Nevada  
May 24, 2001

  
\_\_\_\_\_  
Hon. Gregg W. Zive  
UNITED STATES BANKRUPTCY JUDGE