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Proposed Counsel to the Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:	)	Chapter 11
TRONOX INCORPORATED, <u>et al.</u> , <sup>1</sup>	)	Case No. 09-10156-ALG
Debtors.	)	Joint Administration Requested

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**NOTICE OF HEARING ON FIRST DAY MOTIONS**

PLEASE TAKE NOTICE that on January 12, 2009 (the "Petition Date"), Tronox Incorporated and certain of its subsidiaries and affiliates, as debtors and debtors-in-possession and listed in Schedule 1 attached hereto (collectively, the "Debtors"), each filed a voluntary petition for relief under title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (as amended, the "Bankruptcy Code") in the United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court").

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<sup>1</sup> The Debtors in these cases include: Tronox Luxembourg S.ar.L.; Tronox Incorporated; Cimarron Corporation; Southwestern Refining Company, Inc.; Transworld Drilling Company; Triangle Refineries, Inc.; Triple S, Inc.; Triple S Environmental Management Corporation; Triple S Minerals Resources Corporation; Triple S Refining Corporation; Tronox LLC; Tronox Finance Corp.; Tronox Holdings, Inc.; Tronox Pigments (Savannah) Inc.; and Tronox Worldwide LLC.

**PLEASE TAKE FURTHER NOTICE** that in connection with the Debtors' chapter 11 cases, the motions set forth below may be heard at the hearing scheduled for **January 13, 2009 at 11:00 A.M. (Eastern Time)**, before **The Honorable Allan L. Gropper, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, Courtroom No. 617, New York, New York 10004**, or at such other time as the Court may determine:

1. Motion of the Debtors for Entry of an Order Directing Joint Administration of Their Related Chapter 11 Cases
2. Motion of the Debtors for Entry of Interim and Final Orders (A) Authorizing The Debtors To Obtain Superpriority Priming Postpetition Secured Financing And Utilize Cash Collateral; (B) Authorizing The Debtors To Repay Their Receivables Securitization Facility; (C) Granting Adequate Protection To Prepetition Secured Lenders; And (D) Scheduling Final Hearing -- **Interim Relief**
3. Debtors' *Ex Parte* Motion for Entry of an Order (A) Authorizing the Debtors to File under Seal the Confidential Exhibit to the Debtor in Possession Financing Motion and (B) Limiting Notice Thereof
4. Motion of the Debtors for Entry of an Order Authorizing the Debtors to: (A) Continue (I) Using their Existing Cash Management System, Bank Accounts and Business Forms, and Paying Any Related Fees; (II) Transferring Funds Between the Debtors and their Foreign Subsidiaries; (III) Use of Electronic Debit, Wire Transfers and Automated Clearing House Payments; (IV) Investing Excess Funds Pursuant to Section 345 of the Bankruptcy Code; (B) Grant Postpetition Intercompany Claims Administrative Expense Priority Pursuant to Sections 364, 503(b)(1) and 507(a)(2) of the Bankruptcy Code; and (C) Continue Intercompany Arrangements in Accordance with Historical Practices -- **Interim Relief**
5. Motion of the Debtors for Entry of an Order (A) Establishing Notification And Hearing Procedures for Transfers of Certain Common Stock and (B) Granting Related Relief -- **Interim Relief**
6. Motion of the Debtors for Entry of Interim and Final Orders Authorizing, but not Directing, the Debtors to (A) Pay Certain Prepetition Compensation and Reimbursable Employee Expenses, (B) Pay and Honor Employee Medical and Other Benefits and (C) Continue Employee Wage and Benefit Programs -- **Interim Relief**

7. Motion of the Debtors for Entry of Interim and Final Orders (A) Authorizing, But Not Directing, the Debtors to Pay Prepetition Claims of Critical Vendors and Service Providers and (B) Approving Procedures Related Thereto -- **Interim Relief**
8. Motion of the Debtors for Entry of Interim and Final Orders Authorizing, But Not Directing, the Debtors to Pay Prepetition Claims of Foreign Vendors -- **Interim Relief**
9. Motions of the Debtors for Entry of an Order Authorizing, but not Directing, the Debtors to Pay Prepetition Claims of Shippers, Warehousemen and Other Lien Claimants
10. Motion of the Debtors for Entry of Interim and Final Orders Determining Adequate Assurance of Payment for Future Utility Services -- **Interim Relief**
11. Motion of the Debtors for Entry of Interim and Final Orders Authorizing the Debtors to (A) Continue Prepetition Insurance Policies, (B) Continue Prepetition Insurance Bond Programs and (C) Obtain New Insurance Policies and Bonds -- **Interim Relief**
12. Motion of the Debtors for Entry of an Order Authorizing, but not Directing, the Debtors to Continue their Customer and Sales Commission Programs and Honor Prepetition Commitments Related Thereto
13. Motion of the Debtors for Entry of Interim and Final Orders Authorizing, But Not Directing, the Debtors to Remit and Pay Certain Taxes and Fees - **Interim Relief**
14. Motion of the Debtors for Entry of an Order Establishing Certain Notice, Case Management and Administrative Procedures
15. Motion of the Debtors for Entry of an Order Granting an Extension of Time To File (A) Statements of Financial Affairs and Schedules of Assets and Liabilities, (B) Schedules of Current Income and Expenditures, (C) Statements of Executory Contracts and Unexpired Leases and (D) Lists of Equity Security Holders
16. Motion of the Debtors for Authority to (A) Prepare a List of Creditors in Lieu of Submitting a Formatted Mailing Matrix, (B) File a Consolidated List of the Debtors' 30 Largest Unsecured Creditors and (C) Mail Initial Notices
17. Application of the Debtors for Entry of an Order Authorizing the Employment and Retention of Kurtzman Carson Consultants LLC as Notice and Claims Agent for the Debtors and Debtors in Possession

18. Application of the Debtors for Entry of an Order Authorizing the Employment and Retention of Kirkland & Ellis LLP as Attorneys for the Debtors and Debtors In Possession Effective Nunc Pro Tunc to the Petition Date
19. Application of the Debtors for Entry of an Order Authorizing the Employment and Retention of Rothschild, Inc. as Investment Banker and Financial Advisor for the Debtors and Debtors In Possession
20. Debtors' Application to Employ and Retain Togut, Segal & Segal as Conflicts Counsel to the Debtors and Debtors In Possession
21. Motion of the Debtors for Entry of an Order Authorizing the Retention and Compensation of Certain Professionals Utilized in the Ordinary Course of Business
22. Motion of the Debtors for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Members of Official Committees

**PLEASE TAKE FURTHER NOTICE** that copies of the first day hearing notice and the first day motions may be obtained from the Debtors' proposed notice and claims agent, Kurtzman Carson Consultants LLC, at [www.kccllc.net/Tronox](http://www.kccllc.net/Tronox) or by calling 866-381-9100.

New York, New York  
Dated: January 12, 2009

/s/ Jonathan S. Henes  
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### **Schedule 1**

- Tronox Luxembourg S.ar.L. - Case No. 09-10155-ALG
- Tronox Incorporated - Case No. 09-10156-ALG
- Cimarron Corporation - Case No. 09-10157-ALG
- Southwestern Refining Company, Inc. - Case No. 09-10158-ALG
- Transworld Drilling Company - Case No. 09-10159-ALG
- Triangle Refineries, Inc. - Case No. 09-10160-ALG
- Triple S Environmental Management Corporation - Case No. 09-10161-ALG
- Triple S Minerals Resources Corporation - Case No. 09-10162-ALG
- Triple S Refining Corporation - Case No. 09-10163-ALG
- Triple S, Inc. - Case No. 09-10164-ALG
- Tronox Finance Corp. - Case No. 09-10165-ALG
- Tronox Holdings, Inc. - Case No. 09-10166-ALG
- Tronox LLC - Case No. 09-10167-ALG
- Tronox Pigments (Savannah) Inc. - Case No. 09-10168-ALG
- Tronox Worldwide LLC - Case No. 09-10169-ALG