

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re:) Chapter 11
)
GULF PACKAGING, INC.,¹) Case No. 15-15249
)
Debtor.) Hon. Pamela S. Hollis
)
)
)
)

**LIMITED OBJECTION AND RESERVATION OF RIGHTS OF THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO THE PROPOSED
FINAL ORDER ON DEBTOR’S MOTION TO PAY CERTAIN PREPETITION
WAGES, SALARIES AND OTHER COMPENSATION**

The Official Committee of Unsecured Creditors (the “Committee”) of Gulf Packaging, Inc. (the “Debtor”), by and through its undersigned proposed counsel, hereby submits this limited objection and reservation of rights (the “Objection”) to the proposed final order with respect to the motion (the “Motion”) of Gulf Packaging, Inc. (the “Debtor”) for authority to pay certain prepetition wages, salaries and other compensation (the “Wages Motion”). In support of this Objection, the Committee states as follows:

The Motion was initially presented to the Court on May 12, 2015, which was the day after the Committee was formed. Proposed counsel for the Committee appeared and objected to certain relief requested in the Motion. The deadline to object to the Motion was extended until May 22, 2015. The parties have since worked to reach an agreement to address the Committee’s concerns, and are currently negotiating the final pieces of an agreed order. While the Committee believes an agreement will eventually be reached, a few material changes to the proposed order requested by the Debtor have not yet been approved by the Committee. Many of the Committee members were not working a full business day on May 22, 2015, as it is the eve of Memorial

Day weekend and, therefore, it was not possible to convene the Committee to address the proposed changes to the order. The Committee hereby submits this Objection to preserve its rights in the event an agreement is not ultimately reached.

Dated: May 22, 2015

OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF GULF PACKAGING, INC.

By: /s/ Shelly A. DeRousse
One of Its Proposed Attorneys

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¹ The last four digits of the Debtor's tax identification number are 5030.