UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

In re:)	Chapter 11
	GULF PACKAGING, INC.,1)	Case No. 15-15249 (PSH)
	Debtor.)	

NOTICE OF (A) FILING OF DISCLOSURE STATEMENT, (B) OBJECTION DEADLINE, (C) VOTING DEADLINE, AND (D) REQUESTED COMBINED HEARING ON DISCLOSURE STATEMENT APPROVAL AND PLAN CONFIRMATION

PLEASE TAKE NOTICE that on October 30, , 2015, Gulf Packaging, Inc., the above-captioned debtor and debtor in possession (the "<u>Debtor</u>," "<u>GPI</u>" or the "<u>Company</u>"), filed its *Disclosure Statement for Debtor's Chapter 11 Plan* (the "<u>Disclosure Statement</u>"), and its *Chapter 11 Plan* (the "<u>Plan</u>").

PLEASE TAKE FURTHER NOTICE that a combined hearing (the "Combined Hearing"), to simultaneously consider approval of the Disclosure Statement and confirmation of the Plan, has been requested. The Debtor has also requested conditional approval of the Disclosure Statement pending the Combined Hearing.

PLEASE TAKE FURTHER NOTICE that the Debtor has requested that the Combined Hearing take place on December 3, 2015 at 11:00 a.m. (prevailing Central Time) before Honorable Pamela S. Hollis, United States Bankruptcy Judge, in the United States Bankruptcy Court for the Northern District of Illinois, Eastern Division, Dirksen Federal Building, 219 South Dearborn Street, Court Room No. 644, Chicago, Illinois 60604. To the extent the Court denies the request for a Combined Hearing, or otherwise modifies any of the dates and times set forth in

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

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this Notice, you will be provided with a new notice which sets forth the modified dates and times of relevant hearings and deadlines.

PLEASE TAKE FURTHER NOTICE that, pending further notice about any changed deadlines, objections to approval of the Disclosure Statement and confirmation of the Plan, if any, must be (i) in writing and (ii) served by first class mail, postage prepaid, or by hand delivery or email to the following parties, so as to be actually received on or before November 27, 2015, 2015 at 5:00 p.m. (prevailing Central Time): (1) counsel to the Debtor, Gray Reed & McGraw, P.C., 1601 Elm Street, Suite 4600, Dallas, Texas 75201, Attn: Jason S. Brookner (jbrookner@grayreed.com) and FrankGecker LLP, 325 N. LaSalle Street, Suite 625, Chicago, Illinois 60654, Attn: Jeremy Kleinman (jkleinman@fgllp.com), (ii) counsel to the Committee, Freeborn & Peters LLP, 311 S. Wacker Drive, Suite 3000, Chicago, Illinois 60606, Attn: Shelly DeRousse (sderousse@freeborn.com) and Richard S. Lauter (rlauter@freeborn.com), (iii) counsel to FCC, Goldberg Kohn, Ltd., 55 East Monroe Street, Suite 3300, Chicago, Illinois 60603, Attn: (dimitri.karcazes@goldbergkohn.com) Dimitri Karcazes and Zarine (zarine.alam@goldbergkohn.com) and (iv) the Office of the United States Trustee, 219 S. Dearborn Street, Chicago, Illinois 60604, Katy Gleason Room 873, Attn: (kathryn.m.gleason@usdoj.gov).

PLEASE TAKE FURTHER NOTICE that the Debtor reserves its right to file replies to any objections to confirmation of the Plan no later than December 2, 2015 at 5:00 p.m. prevailing Central Time.

PLEASE TAKE FURTHER NOTICE that if you are the holder of a claim against the Debtor as of October 30, 2015 (the "<u>Voting Record Date</u>") in a class entitled to vote on the Plan, you will be receiving, by separate mailing, a ballot (a "<u>Ballot</u>") containing voting instructions

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appropriate for your claim. If you do not receive a Ballot or other Solicitation Materials, please contact the tabulation agent, BMC Group, Inc. (the "Tabulation Agent") at the address specified.

PLEASE TAKE FURTHER NOTICE for your vote to be counted, you must complete all required information on the Ballot, execute the Ballot, and return the completed Ballot so that it is actually received by the Tabulation Agent at the address specified below no later than 5:00 p.m. (Central Time) on November 23, 2015 (the "Voting Deadline"). You are urged to carefully read all instructions received with the Solicitation Materials to ensure that your Ballot is properly completed and timely submitted. The Debtor has asked that the Court approve certain procedures for tabulation of votes to accept or reject the Plan, which will be set forth in further Order.

PLEASE TAKE FURTHER NOTICE that copies of the Plan and Disclosure Statement, and all other pleadings filed in this case, are available electronically from the Bankruptcy Court's website (for a fee) at https://ecf.ilnb.uscourts.gov. Interested parties may also request a copy of the Disclosure Statement and Plan by contacting (a) counsel to the Debtor as follows: (i) by written request to Gray Reed & McGraw, P.C., 1601 Elm Street, Suite 4600, Dallas, TX 75201, Attn: Trinitee G. Green or (ii) by e-mail to tgreen@grayreed.com with "Gulf Packaging, Inc." in the subject line or (b) the Solicitation and Tabulation Agent, BMC Group, Inc. ("BMC Group") via: written request to BMC Group, Inc., Attn: GPI Ballot Processing Center, PO Box 90100, Los Angeles, CA 90009, visiting BMC Group's website at www.bmcgroup.com/gpi, or email to gpi@bmcgroup.com. Copies of the Plan and Disclosure Statement and all other documents filed in the above captioned chapter 11 case, are available for viewing, download or printing free of charge at the Tabulation Agent's website at www.bmcgroup.com/gpi.

PLEASE TAKE FURTHER NOTICE that Article 11 of the Plan contains the following

injunction provision:

11.3 Injunction and Stay.

- Except as otherwise expressly provided in the Plan, all Persons or (a) entities who have held, hold, or may hold Claims against or Equity Interests in the Debtor are permanently enjoined, from and after the Effective Date, from (i) commencing or continuing in any manner any action or other proceeding of any kind on any such Claim against or Equity Interest in the Debtor, the Creditor Trust, the Trustee, or the Creditor Trust Assets, (ii) the enforcement, attachment, collection or recovery by any manner or means of any judgment, award, decree or order against the Debtor, the Creditor Trust, the Trustee, or the Creditor Trust Assets with respect to any such Claim or Equity Interest, (iii) creating, perfecting or enforcing any encumbrance of any kind against the Debtor, the Creditor Trust, the Trustee, or the Creditor Trust Assets, as applicable with respect to any such Claim or Equity Interest, (iv) asserting any right of setoff, subrogation or recoupment of any kind against any obligation due from the Debtor or Creditor Trust, or against the property or interests in property of the Creditor Trust with respect to any such Claim or Equity Interest, and (v) pursuing any Claim released under the terms of the Plan or the Confirmation Order.
- Unless otherwise provided, all injunctions or stays arising under or (b) entered during the Debtor's Chapter 11 Case under sections 105 or 362 of the Bankruptcy Code, or otherwise, and in existence on the Confirmation Date, shall remain in full force and effect until the Effective Date.

PLEASE TAKE FURTHER NOTICE that the Combined Hearing may be adjourned

from time to time without any notice other than a request made in open court.

Respectfully submitted this 30th day of October, 2015.

FRANK GECKER LLP

/s/ Joseph D. Frank

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