Charles R. Gibbs
Texas State Bar No. 07846300
Akin Gump Strauss Hauer & Feld LLP
1700 Pacific Avenue, Suite 4100
Dallas, Texas 75201
Telephone: (214) 969-2800
Facsimile: (214) 969-4343

David H. Botter
New York State Bar No. DB-2300
Akin Gump Strauss Hauer & Feld LLP
590 Madison Avenue
New York, New York 10022
Telephone: (212) 872-1055
Facsimile: (212) 872-1002

Attorneys for Debtors and Debtors in Possession

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

In re:	§	
	§	
MOSAIC GROUP (US) INC., et al.	§	Case No. 02-81440-HDH-11
	§	
Debtors.	§	(Jointly Administered)

NOTICE OF EXPEDITED HEARING

TO ALL PARTIES IN INTEREST:

PLEASE TAKE NOTICE that the motion (the "Motion") listed below has been set for hearing before the Honorable Harlin D. Hale, United States Bankruptcy Judge, on **June 1, 2004 at 1:30 p.m.** at the Earl Cabell Building, U.S. Courthouse, 1100 Commerce Street, Courtroom #1, Dallas, Texas 75242:

Motion to Appoint a Chapter 11 Trustee

PLEASE TAKE FURTHER NOTICE that copies of the Motion which has been filed with the United States Bankruptcy Court for the Northern District of Texas, Dallas Division, is

available by e-mail, in Adobe Acrobat PDF format. If you would like to receive a copy of the Motion, please contact Kevin D. Rice (kdrice@akingump.com or 214-969-2800)

Dated: May 25, 2004

Respectfully submitted,

AKIN GUMP STRAUSS HAUER & FELD LLP

By: /s/ Kevin D. Rice
Charles R. Gibbs,
Texas Bar No. 07846300
Kevin D. Rice
Texas State Bar No. 24028469
1700 Pacific Avenue, Suite 4100
Dallas, Texas 75201
Tel: 214-969-2800
Fax: 214-969-4343

AND

David H. Botter
New York State Bar No. DB-2300
AKIN GUMP STRAUSS HAUER & FELD LLP
590 Madison Avenue
New York, New York 10022
Tel: 212-872-1055
Fax: 212-872-1002

ATTORNEYS FOR THE DEBTORS AND DEBTORS IN POSSESSION

CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of May, 2004, I caused a true and correct copy of the foregoing to be sent via electronic mail, facsimile, or overnight delivery (as indicated therein) to those parties listed on **Attachment A** and I caused a true and correct copy of the foregoing to those parties listed on the Master Service List via First Class U.S. Mail.

/s/ Kevin D. Rice
Kevin D. Rice

Attachment A

George F. McElreath
United States Trustee
Office of the United States Trustee
Room 9C60 1100 Commerce Street
Dallas, Texas 75242
Tel: 214-767-8967
Fax: 214-767-8971
george.f.mcelreath@usdoj.gov

William L. Wallander
Vinson & Elkins L.L.P.
3700 Trammell Crow Center
2001 Ross Avenue
Dallas, TX 75201-2975
Tel: 214.220.7905
Fax: 214 999.7905
bwallander@velaw.com
COUNSEL FOR BANKS

Phillip L. Lamberson
Winstead Sechrest & Minick P.C.
5400 Renaissance Tower
1201 Elm Street
Dallas, TX 75270-2199
Tel: 214-745-5400
Fax: 214-745-5390
plambers@winstead.com
COUNSEL TO NOTEHOLDERS

Ron Silverman
Mark Deveno
Bingham McCutchen LLP
399 Park Avenue
New York, NY 10022
Tel: 212-318-7700
Fax: 212-752-5378
ronald.silverman@bingham.com
mark.deveno@bingham.com
COUNSEL TO NOTEHOLDERS

Milly Chow
Blake, Cassels & Graydon LLP
199 Bay Street, 28th Fl.
Commerce Court West
Toronto, Ontario
M5L 1A9
Tel: 416-863-2594
Fax: 416-863-2653
milly.chow@blakes.com
CANADIAN COUNSEL TO BANKS

Greg Watson
Pricewaterhousecoopers Inc.
145 King Street West
Toronto, Ontario
M5H 1V8
Tel: 416-815-5090
Fax: 416-941-8378
greg.watson@ca.pwcglobal.com
FINANCIAL ADVISORS TO BANKS

Sheryl E. Seigel
Fasken Martineau
66 Wellington Street West
Suite 4200, Toronto Dominion Bank Tower
Box 20, Toronto-Dominion Centre
Toronto, Ontario
M5K 1N6
Tel: 416-868-3475
Fax: 416-364-7813
sseigel@tor.fasken.com
CANADIAN COUNSEL TO NOTEHOLDERS

David J. Beckman
FTI Consulting
1670 Broadway, Suite 1000
Denver, Colorado 80202
Tel: 720-931-7213
Fax: 720-931-7103
dave.beckman@fticonsulting.com
FINANCIAL ADVISORS TO NOTEHOLDERS

Joel Simon
Crossroads, LLC
400 Madison Ave, 3rd Floor
New York, New York 10017
Fax: 212-610-5601
jsimon@xroadsllc.com

Ellen Gordon
Crossroads, LLC
9 Executive Circle, Suite 190
Irvine, CA 92614
Fax: 949.567.1655
egordon@xroadsllc.com