

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

In re: : Chapter 11
: :
NIPPON ELECTRIC GLASS : Case No. 04-63851
OHIO, INC., :
: :
Debtor. : Judge John E. Hoffman, Jr.

**MOTION FOR AN ORDER SCHEDULING AN EXPEDITED HEARING TO CONSIDER
DEBTOR'S SECOND MOTION FOR AN ORDER PURSUANT TO 11 U.S.C. § 1121(d)
EXTENDING DEBTOR'S EXCLUSIVITY PERIODS FOR FILING CHAPTER 11 PLAN
AND SOLICITING VOTES THEREON**

Nippon Electric Glass Ohio, Inc. (the "Debtor"), debtor and debtor in possession, by and through counsel, hereby moves this Court, pursuant to Local Bankruptcy Rule 9073-1(a), for an order, attached hereto as Exhibit A, scheduling an expedited hearing to consider the *Debtor's Second Motion for an Order Pursuant to 11 U.S.C. §1121(d) Extending Debtor's Exclusivity Period for Filing Chapter 11 Plan and Soliciting Votes Thereon* (the "Second Exclusivity Motion"), and approving the form and manner of notice.

A memorandum in support of this expedited hearing motion is provided below.

Dated: Columbus, Ohio
March 18, 2005

Respectfully submitted,

/s/ Stephanie P. Union
Kenneth R. Cookson (0020216)
Stephanie P. Union (0071092)
KEGLER, BROWN, HILL & RITTER
A Legal Professional Association
65 East State Street, Suite 1800
Columbus, Ohio 43215
614/462-5400
Fax: 614/464-2634
kcookson@keglerbrown.com
sunion@keglerbrown.com

and

Adam A. Lewis (CA #88736)
Patricia S. Mar (CA #45593)
Jeffrey M. Kayes (CA #216089)
MORRISON & FOERSTER LLP
235 Market Street, 33rd Floor
San Francisco, CA 94105-2482
415/268-7000
Fax: 415/268-7522
alewis@mofo.com
pmar@mofo.com
jkayes@mofo.com

Counsel for Nippon Electric Glass
Ohio, Inc.

MEMORANDUM IN SUPPORT

In support of the expedited hearing motion, the Debtor respectfully represents the following:

I. Background

1. The Debtor filed a voluntary petition for relief under Chapter 11 of Title 11 (the “Bankruptcy Code”) of the United States Code on September 1, 2004 (the “Petition Date”). The Debtor continues to operate its business and manage its properties as a debtor in possession under sections 1107 and 1108 of the Bankruptcy Code.
2. No creditors’ committee, trustee or examiner has been appointed in this Chapter 11 case.
3. The Debtor is in the business of manufacturing glass parts for cathode ray tubes used in television sets. The Debtor has gross revenue of approximately \$20 million a year from sales to manufacturers of television sets.

4. The initial Exclusivity Periods to file a plan of reorganization and to obtain acceptance thereof was set to expire on December 30, 2004 (120 days from the Petition Date) and February 28, 2005 (180 days Petition Date), respectively.

5. Debtor previously requested, and was given, an extension of time to file a plan of reorganization and to obtain acceptance thereof until April 29, 2005 and June 28, 2005, respectively.

II. Law and Argument

7. As described in detail in the Second Exclusivity Motion, the Debtor seeks authority to extend the time for filing a plan of reorganization and for soliciting votes thereon. The Debtor requests these matters be set for hearing on April 7, 2005 at 11:00 a.m.

8. The Debtor is serving this motion upon (a) the United States Trustee for the Southern District of Ohio, Eastern Division, (b) those parties listed on the Debtor's list of twenty (20) largest creditors, and (c) all other parties having requested notice in this case.

WHEREFORE, based on the foregoing, the Debtor respectfully requests that the Court enter an Order, substantially in the form attached hereto as Exhibit A, (a) scheduling an expedited hearing on the Second Exclusivity Motion, (b) approving the form and manner of notice substantially in the form attached hereto as Exhibit B, and (c) granting such other and further relief as the Court deems just and proper.

Dated: Columbus, Ohio
March 18, 2005

Respectfully submitted,
/s/ Stephanie P. Union
Kenneth R. Cookson (0020216)
Stephanie P. Union (0071092)
KEGLER, BROWN, HILL & RITTER
A Legal Professional Association
65 East State Street, Suite 1800
Columbus, Ohio 43215
614/462-5400
Fax: 614/464-2634
kcookson@keglerbrown.com
sunion@keglerbrown.com

and

Adam A. Lewis (CA #88736)
Patricia S. Mar (CA #45593)
Jeffrey M. Kayes (CA #216089)

MORRISON & FOERSTER LLP

235 Market Street, 33rd Floor

San Francisco, CA 94105-2482

415/268-7000

Fax: 415/268-7522

alewis@mofocom

pmar@mofocom

jkayes@mofocom

Counsel for Nippon Electric
Glass Ohio, Inc.

EXHIBIT A

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

In re:	:	Chapter 11
	:	
NIPPON ELECTRIC GLASS	:	Case No. 04-63851
OHIO, INC.,	:	
	:	
Debtor.	:	Judge John E. Hoffman, Jr.

**ORDER SCHEDULING AN EXPEDITED HEARING TO CONSIDER DEBTOR'S
SECOND MOTION FOR AN ORDER PURSUANT TO 11 U.S.C. § 1121(d) EXTENDING
DEBTOR'S EXCLUSIVITY PERIODS FOR FILING CHAPTER 11 PLAN
AND SOLICITING VOTES THEREON**

Upon consideration of the motion (the "Motion") for an expedited hearing on the *Debtor's Second Motion for an Order Pursuant to 11 U.S.C. §1121(d) Extending Debtor's Exclusivity Period for Filing Chapter 11 Plan and Soliciting Votes Thereon* (the "Second Exclusivity Motion") filed by Nippon Electric Glass Ohio, Inc. (the "Debtor"), debtor and debtor in possession; and it appearing that the relief requested is in the best interest of the Debtor's estate, its creditors and other parties in interest; and it appearing the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and it appearing that due and sufficient notice

of the Motion having been given; and after due deliberation and cause appearing therefore; it is hereby ORDERED that:

1. The Motion is granted and an expedited hearing on the Second Exclusivity Motion is scheduled for April 7, 2005 at 11:00 a.m., at the United States Bankruptcy Court, 170 North High Street, Columbus, Ohio 43215. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.

2. The Debtor shall serve the Notice, prescribed in the form attached to the Motion. The Debtor shall serve the Notice upon the Offices of the United States Trustee, the list of twenty largest unsecured creditors, and other parties requesting notice in this case by regular U.S. Mail, postage prepaid on or before March 18, 2005.

3. Interested parties shall file and serve their responsive pleadings and/or objections to the Scrap and Advance Motion on or before noon, _____, 2005, upon counsel for the Debtor, the Office of the United States Trustee, and the list of twenty largest creditors.

4. The Debtor is authorized and empowered to take all actions and execute all documents or refrain from any actions necessary or appropriate to implement the relief granted in this Order.

IT IS SO ORDERED.

Copies to attached Service List

###

Exhibit B

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

In re:	:	Chapter 11
	:	
NIPPON ELECTRIC GLASS	:	Case No. 04-63851
OHIO, INC.,	:	
	:	
Debtor.	:	Judge John E. Hoffman, Jr.

NOTICE OF EXPEDITED HEARING ON DEBTOR'S SECOND MOTION FOR AN ORDER PURSUANT TO 11 U.S.C. § 1121(d) EXTENDING DEBTOR'S EXCLUSIVITY PERIODS FOR FILING CHAPTER 11 PLAN AND SOLICITING VOTES THEREON

Please take notice that the *Debtor's Second Motion for an Order Pursuant to 11 U.S.C. §1121(d) Extending Debtor's Exclusivity Period for Filing Chapter 11 Plan and Soliciting Votes Thereon* (the "Second Exclusivity Motion") was served by regular U.S. Mail, postage prepaid, on the 18 day of March, 2005.

The Second Exclusivity Motion has been set for hearing on April 7, 2005, at 11:00 a.m., at the U.S. Bankruptcy Court, 170 North High Street, Columbus, Ohio, 43215. (See attached Order Granting Expedited Hearing).

The last date to object to the Second Exclusivity Motion has been set by the Court for noon on April 6, 2005. (See attached Order Granting Expedited Hearing).

Dated: Columbus, Ohio
March 18, 2005

Respectfully submitted,

/s/ Stephanie P. Union
Kenneth R. Cookson (0020216)
Stephanie P. Union (0071092)
KEGLER, BROWN, HILL & RITTER
A Legal Professional Association
65 East State Street, Suite 1800
Columbus, Ohio 43215
614/462-5400
Fax: 614/464-2634

kcookson@keglerbrown.com
sunion@keglerbrown.com

and

Adam A. Lewis (CA #88736)
Patricia S. Mar (CA #45593)
Jeffrey M. Kayes (CA #216089)
MORRISON & FOERSTER LLP
235 Market Street, 33rd Floor
San Francisco, CA 94105-2482
415/268-7000
Fax: 415/268-7522
alewis@mofo.com
pmar@mofo.com
jkayes@mofo.com

Counsel for Nippon Electric Glass
Ohio, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing *Notice of Expedited Hearing on Debtor's Second Motion for an Order Pursuant to 11 U.S.C. §1121(d) Extending Debtor's Exclusivity Period for Filing Chapter 11 Plan and Soliciting Votes Thereon* was served by regular U.S. Mail and/or facsimile service and/or electronic mail service as indicated on the electronic receipt of filing, on all parties whose names are listed on the attached Service List this 18 day of March, 2005.

/s/ Stephanie P. Union
Stephanie P. Union

PATRICIA S. MAR
MORRISON & FOERSTER LLP
425 MARKET STREET 33RD FLOOR
SAN FRANCISCO, CA 94105-2482

NIPPON ELECTRIC GLASS OHIO, INC.
PO BOX 220
EL CENTRO, CA 92444

ASST US TRUSTEE (COL)
OFFICE OF THE US TRUSTEE
170 NORTH HIGH STREET
SUITE 200
COLUMBUS, OH 43215

DELOITTE & TOUCHE LLP
SUITE 1900
701 'B' STREET
SAN DIEGO, CA 92101-8198

GALAZ, YAMAZAKI, RUIZ URQUIZ, S.C.
AVENIDA ALEJANDRO VON HUMBOLDT
17617
COL. GARITA DE OTAY, MESA DE OTAY
22509 TIJUANA, BC MEXICO

HITACHI TRANSPORT SYSTEM
(AMERICA), LTD.
17777 STERGIOS ROAD, SUITE 1
CALEXICO, CA 92231

IMEX TRANSPORT, INC.
1616 KLOKE ROAD
CALEXICO, CA 92231

INTERNAL REVENUE SERVICE
OGDEN, UT 84201-0012

INTERNAL REVENUE SERVICE
PHILADELPHIA, PA 19255

JAPAN BANK FOR INTERNATIONAL
COOPERATION, OSAKA BRANCH
4-4, DOJIMAHAMA
1-CHOME, KITA-KU,
OSAKA, 530-0004, JAPAN
ATTN: MS. HIROKO MIYOSHI

MAQSA, INC.
7505 ALAMEDA AVENUE
EL PASO, TX 79915

NEXTEL COMMUNICATIONS
P.O. BOX 54977
LOS ANGELES, CA 90054-0977

NIPPON ELECTRIC GLASS (FUJIAN) CO.,
LTD.
NO. 29 MAWEI TECHNOLOGY
DEVELOPMENT ZONE, RUZHOU
FUJIAN, 350015, CHINA

NIPPON ELECTRIC GLASS (MALAYSIA)
SDN.BHD
LOT 1-7, LION INDUSTRIAL PARK
PERSIARAN JUBIL PERAK
P.O. BOX 7216, 40706
SHAH ALAM, SELANGOR, MALAYSIA

NIPPON ELECTRIC GLASS AMERICA, INC.
650 EAST DEVON, SUITE 110
ITASCA, IL 60143

NIPPON ELECTRIC GLASS CO., LTD.
7-1 SEIRAN 2-CHOME, OTSU
OTSU, SHIGA 520-8539 JAPAN

NIPPON ELECTRIC GLASS MEXICO, S.A.
DE CV
CALZ. ROBLEDO INDUSTRIAL #338,
COL. COLORADO DOS
MEXICALI, BC 21384 MEXICO

NYK LINE (NA) INC.
300 LIGHTING WAY, 5TH FLOOR
SECAUCUS, NJ 07094

PENSION BENEFIT GUARANTY CORP.
1200 K STREET, N.W.
WASHINGTON, DC 20000-4026
RPM MATERIAL HANDLING CO.
619 EAST ROSS AVENUE
EL CENTRO, CA 92243-9797

SUMITOMO CORPORATION
HARUMI ISLAND TRITON SQ., OFFICE
TOWER Y
8-11 HARUMI 1-CHROME, CHOU-KU
TOKYO 104-8610, JAPAN

TECHNEGLAS, INC.
707 EAST JENKINS AVENUE
COLUMBUS, OH 43207

THOMSON, INC.
P.O. BOX 972630
EL PASO, TX 79997

TRANSPORTES JUAN CARLOS DE
MEXICALI,
SADECV BL
BLVD. HECTOR TERAN TERAN 2382
FRACC. LAGUNA XOCHIMILCO
MEXICALI, B.C., MEXICO

U.S. ATTORNEY GENERAL
SOUTHERN DISTRICT OF OHIO
303 MARCONI BLVD., SUITE 200
COLUMBUS, OH 43215

YUSEN AIR & SEA SERVICE (USA) INC.
19001 HARBORGATE WAY
TORRANCE, CA 90501

ROBERT J. SIDMAN, ESQ.
BRENDA K. BOWERS, ESQ.
VORYS, SATER, SEYMOUR
AND PEASE LLP
52 EAST GAY STREET
COLUMBUS, OH 43216-1008

DANIEL A. DEMARCO, ESQ.
CHRISTOPHER B. WICK, ESQ.
HAHN LOESER & PARKS LLP
3300 BP TOWER
200 PUBLIC SQUARE
CLEVELAND, OH 44114-2301

TIM J. ROBINSON
KRISTIN E. RICHNER
SQUIRE SANDERS & DEMPSEY, LLP
1300 HUNTINGTON CENTER
41 SOUTH HIGH STREET
COLUMBUS, OH 43215-6197

U.S. ATTORNEY GENERAL
UNITED STATES
WASHINGTON, DC 20530

YASKAWA ELECTRIC AMERICA, INC.
3355 PAYSPHERE CIRCLE
CHICAGO, IL 60674

PENSION BENEFIT GUARANTY CORP.
OFFICE OF THE GENERAL COUNSEL
1200 K STREET, N.W., STE. 340
WASHINGTON, D.C. 20005-4026

DAVID L. EATON, ESQ.
MARC J. CARMEL, ESQ.
KIRKLAND & ELLIS, LLP
200 E. RANDOLPH DRIVE
CHICAGO, IL 60601