IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
	)	
W. R. GRACE & CO., et al.	)	Case No. 01-01139 (JKF)
	)	
	)	**Objections due by: June 11, 2002**
Debtors.	)	**Hearing Date: June 18, 2002**

NOTICE OF MOTION

TO: Parties required to receive notice pursuant to Del. Bankr. LR 2002-1.

Anthony James McMahon and Thomas Alexander Riddell of KPMG, In their capacity as Scheme Administrators of English and American Insurance Co., Limited, have filed a Motion for an Order Compelling the Production of Documents Pursuant to Federal Rules of Bankruptcy Procedure 2004 and 9016, which seeks the following relief:

> Production of documents related to the reporting and payment of insurance-related claims.

You are required to file a response to the attached motion on or before: June 11, 2002.

At the same time, you must also serve a copy of the response upon movant's attorney:

Francis J. Murphy, Esquire
Murphy Spadaro & Landon
824 Market Street, 7th Fl.
Wilmington, DE 19801
(302) 654-4600

HEARING ON THE MOTION WILL BE HELD ON: JUNE 18, 2002.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

IN THE EVENT THAT ANY OBJECTION OR RESPONSE IS FILED AND SERVED IN ACCORDANCE WITH THIS NOTICE, A HEARING ON THE MOTION WILL BE HELD BEFORE THE HONORABLE JUDITH K. FITZGERALD AT THE BANKRUPTCY COURT, ON JUNE 18, 2002 AT 1:00 P.M.

Date: May 29, 2002

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