

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

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In re: : Case No. 06-51848
: (Jointly Administered)
CEP HOLDINGS, LLC, et al.,¹ :
: Chapter 11
Debtors. :
: Honorable Marilyn Shea-Stonum
: :
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**NOTICE OF ENTRY OF ORDER CONFIRMING FIRST
AMENDED JOINT PLAN OF LIQUIDATION UNDER CHAPTER 11
OF THE BANKRUPTCY CODE PROPOSED BY THE DEBTORS AND THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS DATED MAY 25, 2007**

PLEASE TAKE NOTICE OF THE FOLLOWING:

1. **Confirmation of the Plan.** On July 25, 2007 (the “**Confirmation Date**”), an order (Docket No. 661) (the “**Confirmation Order**”) confirming the *First Amended Joint Plan of Liquidation Under Chapter 11 of the Bankruptcy Code Proposed by the Debtors and the Official Committee of Unsecured Creditors Dated May 25, 2007* (as modified, the “**Plan**”), signed by the Honorable Marilyn Shea-Stonum, United States Bankruptcy Judge, was entered and duly docketed by the Office of the Clerk of the United States Bankruptcy Court for the Northern District of Ohio (the “**Bankruptcy Court**”) in the Chapter 11 cases of the above-captioned debtors (collectively, the “**Debtors**”). Capitalized terms used but not otherwise defined in this Notice shall have the meanings given to them in the Plan or the Confirmation Order.

2. **Copies of the Plan and Confirmation Order.** Copies of the Plan and Confirmation Order and other Plan-related documents (including the Disclosure Statement and all exhibits thereto) are available without charge at <http://www.bmcgroup.com/cep> or may be obtained by submitting a written or oral request to BMC Group, Inc., CEP HOLDINGS, LLC, et al., c/o BMC Group, PO Box 903, El Segundo, CA 90245-0903 (telephone number **(888) 909-0100**). Copies of the Plan and Confirmation Order also may be obtained through the Bankruptcy Court’s electronic filing system at <http://ecf.ohnb.uscourts.gov> or during normal business hours at the Clerk of the Bankruptcy Court, 455 U.S. Courthouse, 2 South Main Street, Akron, Ohio 44308.

¹ The Debtors are: CEP Holdings, LLC, Creative Engineered Polymer Products, LLC and Thermoplastics Acquisition, LLC.

3. **Injunction.** Except as otherwise expressly provided in the Plan, the Confirmation Order or a separate order of the Bankruptcy Court, all entities who have held or may hold Claims against or Equity Interests in the Debtors are permanently enjoined, on or after the Effective Date, from (a) commencing or continuing in any manner any action or proceeding of any kind against the Debtors with respect to any Claim or Equity Interest, (b) the enforcement, attachment, collection or recovery by any manner or means of any judgment, award, decree or order against the Debtors or the CEP Liquidating Trust or against the property or interest in property of the Debtors or the CEP Liquidating Trust on account of any such Claim or Equity Interest, (c) creating, perfecting or enforcing any encumbrance of any kind against the Debtors or the CEP Liquidating Trust or against property or interest in property of the Debtors or the CEP Liquidating Trust on account of any such Claim or Equity Interest, (d) asserting any right of setoff, subrogation or recoupment of any kind against any obligation due from the Debtors or the CEP Liquidating Trust against the property or interest in property of the Debtors or the CEP Liquidating Trust on account of any such Claim or Equity Interest, (e) commencing or continuing in any manner any action or other proceeding of any kind with respect to any claims and causes of action which are extinguished, dismissed or released pursuant to the Plan. Such injunction extends to successors of the Debtors, including, without limitation, the CEP Liquidating Trust, and their respective properties and interests in properties.

4. **Cancellation of Existing Securities and Agreements.** On the Effective Date of the Plan, all of the agreements, instruments, and other documents evidencing the Claim or Equity Interest rights of any holder of a Claim or Equity Interest against the Debtors, including options or warrants to purchase Equity Interests, unvested common stock Equity Interests, any agreement obligating the Debtors to issue, transfer, or sell Equity Interests or any other capital stock of the Debtors shall be deemed cancelled and of no force or effect.

5. **Rejection of Executory Contracts.** On the Effective Date, all executory contracts and unexpired leases to which any one or more of the Debtors is a party shall be deemed rejected, except for any executory contract or unexpired lease that (i) has been assumed or rejected pursuant to a Final Order of the Bankruptcy Court prior to the Effective Date, (ii) is a collective bargaining agreement governed by section 1113 of the Bankruptcy Code or an agreement providing for retiree benefits covered by section 1114 of the Bankruptcy Code, or (iii) is subject to a separate motion to assume or reject (or terminate or modify, as the case may be) filed under sections 365, 1113 and/or 1114 of the Bankruptcy Code by the Debtors prior to the Effective Date. The entry of the Confirmation Order by the Bankruptcy Court constitutes approval of such rejection pursuant to sections 365 and 1123 of the Bankruptcy Code. Claims for rejection damages must be filed as set forth in paragraphs 6(c) and 7(b) below.

6. **Bar Dates.**

- a. **Administrative Expense Claims Bar Date.** Except as otherwise provided below, unless previously filed, proof of Administrative Expense Claims and requests for payment of Administrative Expense Claims that arose on or after the Petition Date must be filed and served, pursuant to the procedures specified herein, *no later than thirty (30) days after the Effective Date*. No proof of Administrative Expense Claim or application for payment of an

Administrative Expense Claim need be filed for the allowance of any: (i) expense or liability incurred in the ordinary course of the operation of the CEP Liquidating Trust on or after the Effective Date; (ii) Administrative Expense Claims held by a trade vendor which administrative liability was incurred in the ordinary course of business of any of the Debtors and such creditor after the Petition Date; (iii) Claims of professionals addressed below and at Article II, Section 2.2 of the Plan; or (iv) fees of the United States Trustee arising under 28 U.S.C. § 1930. Any Person that fails to file a proof of Administrative Expense Claim or request for payment thereof on or before the Administrative Expense Bar Date as required in the Confirmation Order shall be forever barred from asserting such Claim against any of the Debtors, the Estates, the CEP Liquidating Trust or their property and the holder thereof shall be enjoined from commencing or continuing any action, employment of process or act to collect, offset or recover such Administrative Expense Claim.

- b. **Professional Fee Application Deadline.** All Persons seeking an award by the Bankruptcy Court of a professional fee Claim of the nature described in Article II, Section 2.2 of the Plan shall, unless otherwise ordered by the Bankruptcy Court, file their respective final applications for allowance of compensation for service rendered and reimbursement of expenses incurred by the date that is *no later than thirty (30) days after the Confirmation Date or on or before August 24, 2007.*
- c. **Rejection Damage Claims.** In the event that the rejection of an executory contract or unexpired lease by the Debtors pursuant to the Plan results in damages to the other party or parties to such contract or lease, a Claim for such damages, if not heretofore evidenced by a filed proof of claim, shall be forever barred and shall not be enforceable against the Debtors or any property to be distributed under the Plan unless a proof of claim is filed with the Bankruptcy Court and served upon the Trustee by the date that is *no later than thirty (30) days after the Confirmation Date or on or before August 24, 2007.* This deadline is not applicable to any Claim for damages arising out of any separate pre-Confirmation Date order of the Bankruptcy Court authorizing the rejection of an executory contract or unexpired lease.

7. **Addresses and Procedures for Filings.**

- a. **Filing Administrative Expense Claims and Professional Fee Applications.** For the purpose of filing (a) requests for payment of Administrative Expense Claims and (b) applications for the allowance of professional fee Claims, the Bankruptcy Court

requires electronic filing. Any such request, application, motion or related pleading must be served in accordance with the Case Management Procedures established by the Bankruptcy Court. A copy of the 2002 Service List is posted on the website maintained by BMC Group, Inc. at <http://www.bmcgroup.com/cep>.

- b. **Claims Agent Addresses for Filing Rejection Damage Claims.** Proofs of claim for rejection damage claims shall be filed with the Debtors' claims and noticing agent, BMC Group, Inc., by sending the executed proof of claim by (i) regular U.S. mail to CEP HOLDINGS, LLC, et al., c/o BMC Group, PO Box 903, El Segundo, CA 90245-0903 or (ii) messenger or overnight courier to CEP HOLDINGS, LLC, et al., c/o BMC Group, 1330 E. Franklin Ave., El Segundo, CA 90245.

8. **Effective Date.** The Effective Date of the Plan has yet to occur. Notice of the Effective Date will be provided in accordance with the Confirmation Order.

9. **Limitation of this Notice.** *This Notice is intended to provide a brief summary of certain terms of the Plan and the Confirmation Order. Nothing herein is intended to, or shall be deemed to, modify any terms of the Plan or the Confirmation Order or any rights, obligations or deadlines established thereunder. All parties are encouraged to review the Plan and Confirmation Order, as well as the related Disclosure Statement, for further information regarding the topics addressed in this Notice or any other issues relating to the impact of the Confirmation Order.*

Dated: July 27, 2007
Cleveland, OH

CEP HOLDINGS, LLC, et al.,
Debtors and Debtors-in-Possession

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One of Their Attorneys

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