

IT IS SO ORDERED.

Dated: 01:42 PM June 19 2007



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

In re:	:	
	:	Case No. 06-51848
CEP HOLDINGS, LLC, <u>et al.</u> ,	:	(Jointly Administered)
	:	
Debtors.	:	Chapter 11
	:	
	:	Honorable Marilyn Shea-Stonum

**STIPULATED ORDER REGARDING PROOFS OF CLAIM
FILED BY THE UNITED STEELWORKERS**

CEP Holdings, LLC and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”)¹, the Official Committee of Unsecured Creditors (the “Committee”) and the

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

United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union (the “USW”) hereby stipulate to the following facts:

1. On December 15, 2006, this Court entered its Order, Pursuant to Sections 501 and 502 of the Bankruptcy Code and Bankruptcy Rules 2002 and 3003(c)(3), Establishing Bar Dates for filing Proofs of Claim and Approving Form and Manner of Notice Thereof (the “Bar Order”), which, *inter alia*, established March 1, 2007 as the General Bar Date for filing proofs of claim and approved the form of a Bar Date Notice that directed creditors to file proofs of claim with BMC Group in El Segundo, California.

2. On February 28, 2007, counsel for the USW filed two proofs of claim in *In re Creative Engineered Polymer Products, LLC*, Case No. 06-5187, using the Court’s CM/ECF System. The first was an unliquidated claim for wages and benefits due under its collective bargaining agreements with Debtor Creative Engineered Polymer Products, LLC and was docketed as Claim No. 9 by the CM/ECF System (“Claim No. 9”). The second was an unliquidated claim for damages under the Worker Adjustment and Retraining Notification Act, 29 U.S.C. §§2101 to 2109, and was docketed as Claim No. 10 by the CM/ECF System (“Claim No. 10”).

The Debtors, Committee and USW hereby stipulate and agree to the following and request the Court enter an order accordingly:

A. The filing of Claim No. 9 and Claim No. 10 with the Court using the CM/ECF System, rather than with BMC Group, was inadvertent, was otherwise timely and did not prejudice any party.

B. Claim No. 9 and Claim No. 10 are hereby deemed to be properly and timely filed.

C. Entry of this Stipulated Order shall not effect a waiver or prejudice the rights of the Committee or the Debtors, or their successors, to object to either Claim No. 9 or Claim No. 10 on any basis other than timeliness and where or how the claims were filed.

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STIPULATED AND AGREED:

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