

2008 May 23 AM 11:31

CLERK U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
AKRON

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

-----	X
In re:	: Case No. 06-51848
	: (Jointly Administered)
CEP HOLDINGS, LLC, <u>et al.</u> , ¹	:
	: Chapter 11
Debtors.	: Honorable Marilyn Shea-Stonum
	: Related Docket No. 712, 767 and 818
	: Pre-Hearing Date: 05/23/08 at 4:00 p.m.
	: Hearing Date: 05/27/08 at 10:00 a.m.
	: .
	: .
	: .
-----	X

NOTICE OF PROPOSED MAY 27, 2008 HEARING AGENDA TOGETHER WITH DIALING INSTRUCTIONS FOR MAY 23, 2008 TELEPHONIC PRE-HEARING

TO ALL PARTIES IN INTEREST:

The CEP Liquidating Trust hereby provides the below proposed agenda for the matters referenced above (the **"Hearings"**) previously set for hearing for **May 27, 2008 at 10:00 a.m. (EST)** with a telephonic pre-hearing set for **May 23, 2008 at 4:00 p.m. (EST)** (the "Pre-Hearing"). Please be advised that the dialing instructions the Pre-Hearing are as follows:

Telephone Number – (877) 339-0018
Participant Code – *5830573* (note * before and after)

AGENDA

THE CEP LIQUIDATING TRUST PROPOSES THE FOLLOWING AGENDA FOR THE HEARINGS:

- 1. Docket 712 – CEP Liquidating Trust’s Second Omnibus Objection to Claims Filed with the Bankruptcy Court (the “Second Omnibus Claims Objection”) with the exception of the following for the reasons set forth parenthetically below:
 - i. Any claims otherwise resolved by a stipulated order issued by the Bankruptcy Court or the Order Granting the Second Omnibus Claims Objection (Docket 769) (Resolved); and

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

- ii. Claims set forth in Exhibit I to the Second Omnibus Claims Objection – Various former employees at the Middlefield, Ohio plant. The CEP Liquidating Trust and Unite AFL-CIO, CLC Local 1902 have agreed in principal on a resolution of these claims and are currently working toward documentation of their agreement. The CEP Liquidating Trust will request this matter not go forward to permit the parties additional time to facilitate documentation, consent by the former employees and payment of the claims in accordance with the parties’ agreement.

2. Docket 767 – Application of Intergrys Energy Services of NY for the Allowance of an Administrative Expense Claim (the “Intergrys Energy Application”):

- i. The CEP Liquidating Trust and Intergrys Energy Services of NY have uploaded a stipulation and agreed order for review and consideration of the Bankruptcy Court. The CEP Liquidating Trust will request the Bankruptcy Court approve the aforementioned stipulation and agreed order, which resolves the Intergrys Energy Application. As such, the CEP Liquidating Trust will request this matter not go forward.

3. Docket 818 – Objection to Claims of Ohio Bureau of Workers’ Compensation [Claim Nos. 646 & 647] (the “Ohio BWC Objection”):

- i. The CEP Liquidating Trust and the Ohio Bureau of Workers’ Compensation have commenced informal discussions and discovery with respect to the Ohio BWC Objection. The CEP Liquidating Trust will request the Bankruptcy Court set the Ohio BWC Objection for hearing with a mutually agreeable discovery and briefing schedule.

Dated: May 23, 2008

McGuireWoods LLP

By: /s/ William C. Price
Mark E. Freedlander (PA I.D. #70593)
Sally E. Edison (PA I.D. #78678)
William C. Price (PA I.D. #90871)
625 Liberty Avenue, 23rd Floor
Pittsburgh, PA 15222
Telephone: 412-667-6000
Fax: 412-667-6050

Counsel for the CEP Liquidating Trust