

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

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In re:	:	
	:	Case No. 06-61796
CEP HOLDINGS, LLC,	:	
	:	Chapter 11
Debtor.	:	
	:	Honorable Russ Kendig
(Employer Tax I.D. No. 20-330088)	:	
	:	
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In re:	:	
	:	Case No. 06-61794
CREATIVE ENGINEERED POLYMER PRODUCTS, LLC,	:	
	:	Chapter 11
Debtor.	:	
	:	Honorable Russ Kendig
(Employer Tax I.D. No. 20-3210816)	:	
	:	
-----	X	
In re:	:	
	:	Case No. 06-61797
THERMOPLASTICS ACQUISITION, LLC,	:	
	:	Chapter 11
Debtor.	:	
	:	Honorable Russ Kendig
(Employer Tax I.D. No. 20-3851291)	:	
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PROPOSED AGENDA

Set forth for Your Honor’s review are the matters proposed to be scheduled for hearing at 8:30 a.m. on September 22, 2006. The numbers below correspond to the tabs in the “First Day Binder” that will delivered to chambers on September 21, 2006.

I INTRODUCTION

Preliminary Remarks and Introductions

1. Declaration of Joseph Mallak in Support of Chapter 11 Petitions and First Day Motions

II. FIRST DAY PLEADINGS

2. Motion of Debtors and Debtors in Possession Pursuant to Bankruptcy Rule 1015(b) for Joint Administration of Chapter 11 Cases
3. Motion of Debtors and Debtors in Possession for Entry of an Order (I) Authorizing the Debtors to (A) Prepare a Consolidated List of Creditors in Lieu of a Matrix and (B) Mail Initial Notices, and (II) Approving Form of Initial Notice of Commencement of Cases
4. Motion of Debtors and Debtors in Possession, Pursuant to Sections 362, 363, and 364 of the Bankruptcy Code and Bankruptcy Rules 4001(B) and 4001(C), For Interim and Final Orders (I) Authorizing Debtors to Incur Postpetition Secured Indebtedness, (II) Granting Security Interests and Priority Claims, (III) Granting Adequate Protection, (IV) Modifying Automatic Stay and (V) Setting Final Hearing
5. Motion of Debtors and Debtors in Possession, Pursuant to Sections 105(a), 363(b), 507(a)(4), 507(a)(5) and 541(d) of the Bankruptcy Code, for Entry of an Order (I) Authorizing Them to Pay: (A) Prepetition Employee and Independent Contractor Wages, Salaries and Related Items; (B) Prepetition Employee and Independent Contractor Business Expenses; (C) Prepetition Contributions to and Benefits Under Employee Benefit Plans; (D) Prepetition Employee Payroll Deductions and Withholdings; (E) Additional Workforce Costs and (F) All Costs and Expenses Incident to the Foregoing Payments and Contributions; and (II) Granting Certain Related Relief
6. Motion of Debtors and Debtors in Possession, Pursuant to Sections 105(a) And 363(b) of the Bankruptcy Code, for Entry of an Order (I) Authorizing the Debtors to (A) Continue Their Existing Workers' Compensation Programs and (B) Pay Certain Prepetition Workers' Compensation Premiums, Claims and Related Expenses; and (II) Granting Certain Related Relief
7. Motion of Debtors and Debtors in Possession for Entry of an Order Authorizing the Maintenance of Bank Accounts, Continued Use of Existing Cash Management System and Business Forms, and Waiving Investment and Deposit Guidelines of Section 345(b) of the Bankruptcy Code
8. Motion of Debtors and Debtors in Possession, Pursuant to Section 366 of the Bankruptcy Code, for Interim and Final Orders: (A) Prohibiting Utilities From Altering, Refusing or Discontinuing Services to, or Discriminating Against, the Debtors on Account of Prepetition Invoices; (B) Determining that the Utilities Are Adequately Assured of Future Payment; (C) Establishing Procedures for Determining Requests for Additional Assurance; and (D) Permitting Utility Companies to Opt Out of the Procedures Established Herein

9. Motion of Debtors and Debtors in Possession, Pursuant to Sections 503(b) And 363(c) of the Bankruptcy Code, for Entry of an Order (A) Granting Administrative Expense Status to the Debtors' Undisputed Obligations Arising From Postpetition Delivery of Goods Ordered During the Prepetition Period and (B) Authorizing Debtors to Pay Such Obligations in the Ordinary Course of Business
10. Motion of Debtors and Debtors in Possession, Pursuant to Section 105(a), 363 and 541 of the Bankruptcy Code, for Entry of an Order Confirming Authority to Pay Prepetition Sales and Use Taxes
11. Motion of Debtors and Debtors in Possession For The Entry Of An Order: (I) Establishing Procedures For Resolving Reclamation Claims Asserted Against The Debtors; And (II) Granting Certain Related Relief
12. Motion of Debtors and Debtors in Possession, Pursuant to Sections 105(a), 107(b) and 1102(b)(3)(A) of the Bankruptcy Code, for an Order Confirming The Creditors' Committee Is Not Authorized or Required to Provide Access to the Debtors' (A) Confidential Information or (B) Privileged Information
13. Motion of Debtors and Debtors in Possession for an Order Waiving Compliance with Local Bankruptcy Rules 9013-1(A), 9013-2(A) and 9013-2(D)
14. Motion of Debtors and Debtors in Possession for Entry of an Order, Pursuant to Federal Rule of Bankruptcy Procedure 1007(c), Extending Time to File Schedules of Assets and Liabilities, Schedules of Current Income and Expenditures, Schedules of Executory Contracts and Unexpired Leases and Statements of Financial Affairs
15. Motion of Debtors and Debtors in Possession, Pursuant to Sections 102 and 105(A) of the Bankruptcy Code and Bankruptcy Rules 2002(m) and 9007, Authorizing: (I) the Establishment of Omnibus Hearing Dates; and (II) Certain Electronic Notice, Case Management and Administrative Procedures
16. Motion of Debtors and Debtors in Possession, Pursuant to Sections 105(a) and 331 of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 2014(a), for Entry of an Order Establishing Procedures for Monthly Compensation and Reimbursement of Expenses of Professionals and Committee Members
17. Application of Debtors and Debtors in Possession for Entry of an Order, Pursuant to Sections 327(a) and 328(a) of the Bankruptcy Code and Bankruptcy Rule 2014(a), Authorizing Debtors to Employ and Retain Baker & Hostetler, LLP as General Bankruptcy Counsel Effective as of the Petition Date
18. Application of Debtors and Debtors in Possession for Order, Pursuant to Sections 327(a) and 328 of the Bankruptcy Code and Bankruptcy Rule 2014(A), Authorizing Debtors to Employ Giuliani Capital Advisors LLC as Investment Bankers
19. Application of Debtors and Debtors in Possession for Order, Pursuant to Sections 327(a) and 328 of the Bankruptcy Code and Bankruptcy Rule 2014(a), Authorizing Debtors to Employ Glass & Associates as Financial Advisors

20. Application of Debtors and Debtors in Possession for Entry of an Order Pursuant to 28 U.S.C. §156(c) and Bankruptcy Rule 2002 Authorizing Employment and Retention of BMC Group, Inc. as Claims, Noticing and Balloting Agent

Dated: September 20, 2006
Cleveland, Ohio

Respectfully submitted,

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

By: Joseph F. Hutchinson, Jr.
One of Their Attorneys

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