IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

BOOMERANG TUBE, LLC, a Delaware limited liability company, et al., 1

Debtors.

Chapter 11

Case No. 15-11247 (MFW)

Jointly Administered

Docket Ref. Nos. 97 & 196

ORDER, PURSUANT TO SECTIONS 501 AND 502 OF THE BANKRUPTCY CODE, BANKRUPTCY RULES 2002 AND 3003(C)(3), AND LOCAL RULE 2002-1, (I) ESTABLISHING BAR DATES FOR FILING PROOFS OF CLAIM AND (II) APPROVING THE FORM AND MANNER OF NOTICE THEREOF

Upon consideration of the motion (the "Motion")² of the above captioned debtors and debtors in possession (collectively, the "Debtors") for the entry of an order, pursuant to sections 501 and 502(b) of the Bankruptcy Code, Bankruptcy Rules 2002 and 3003(c)(3), and Local Rule 2002-1(e), (i) establishing bar dates for filing proofs of claim and (ii) approving the form and manner of notice thereof; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated February 29, 2012; and it appearing that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and it appearing that venue of this proceeding and the Motion is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and adequate notice of the Motion and opportunity for objection having been given under the circumstances; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein

The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Boomerang Tube, LLC (9415); BTCSP, LLC (7632); and BT Financing, Inc. (6671). The location of the Debtors' corporate headquarters is 14567 North Outer Forty, Suite 500, Chesterfield, Missouri 63017.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

and that such relief is in the best interests of the Debtors, their estates, their creditors, and all parties in interest; and any objections to the Motion having been withdrawn or overruled on the merits; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED that:

- 1. The Motion is granted as set forth herein.
- 2. Except as otherwise provided herein, all persons or entities (including, without limitation, individuals, partnerships, corporations, joint ventures, and trusts) that assert a claim, as defined in section 101(5) of the Bankruptcy Code, against the Debtors (each, a "Claim," and collectively, "Claims"), including, without limitation, any claims under section 503(b)(9) of the Bankruptcy Code (each, a "503(b)(9) Claim"), secured claims, and priority claims, which arose on or prior to the Petition Date, who do not file a proof of such Claim (each, a "Proof of Claim," and collectively, "Proofs of Claim") in the manner provided for herein so that it is actually received on or before 5:00 p.m. (prevailing Eastern Time) on the date which is thirty-five (35) days after the Service Date (the "General Bar Date"), shall not be permitted to (a) vote to accept or reject any plan filed in these chapter 11 cases, (b) participate in any distribution in these chapter 11 cases on account of such Claim, or (c) receive further notices regarding such Claim.
- 3. Except as otherwise provided herein, all governmental units, as defined in section 101(27) of the Bankruptcy Code, who do not file a Proof of Claim so that it is actually received on or before **December 7, 2015 at 5:00 p.m.** (prevailing Eastern Time) (the "Government Bar Date") shall not be permitted to (a) vote to accept or reject any plan filed in these chapter 11 cases, (b) participate in any distribution in these chapter 11 cases on account of such Claim, or (c) receive further notices regarding such Claim.

- 4. The following procedures for the filing of Proofs of Claim in these chapter 11 cases shall apply:
 - a. A Proof of Claim must: (i) be written in the English language; (ii) be denominated in lawful currency of the United States as of the Petition Date; (iii) conform substantially to the Proof of Claim Form or Official Bankruptcy Form No. 10 ("Official Form 10"); (iv) set forth with specificity the legal and factual basis for the alleged Claim; (v) include supporting documentation (or, if such documentation is voluminous, include a summary of such documentation) or an explanation as to why such documentation is not available; and (vi) be signed by the claimant or, if the claimant is not an individual, by an authorized agent of the claimant.
 - b. A Proof of Claim shall be deemed timely filed only if the Proof of Claim is <u>actually received</u> by Donlin Recano on or before the applicable Bar Date (i) by mail at the following address:

Donlin, Recano & Company, Inc. Re: Boomerang Tube, LLC, et al. P.O. Box 199001 Blythebourne Station Brooklyn, NY 11219

or (ii) by courier, hand delivery, or overnight delivery at the following address:

Donlin, Recano & Company, Inc. Re: Boomerang Tube, LLC, et al. 6201 15th Avenue Brooklyn, NY 11219

- c. Proofs of Claim sent by facsimile, telecopy, or electronic mail will not be accepted.
- 5. The following persons and entities are <u>not</u> required to file a Proof of Claim on or before the applicable Bar Date:
 - a. Any person or entity whose Claim is listed on the Schedules and (i) whose Claim is not described thereon as "disputed," "contingent," and/or "unliquidated," (ii) who does not dispute the amount or classification of the Claim set forth in the Schedules, and (iii) who does not dispute that the

³ Official Form 10 can be found at http://www.uscourts.gov/forms/bankruptcy-forms, the Official Website for the United States Bankruptcy Courts.

- Claim is an obligation of the specific Debtor against which the Claim is listed on the Schedules;
- b. Any person or entity whose Claim has been paid in full by the Debtors;
- c. Professionals retained by the Debtors or the Committee pursuant to orders of the Court who assert administrative claims for fees and expenses subject to the Court's approval pursuant to sections 328, 330, 331, and 503(b) of the Bankruptcy Code or 28 U.S.C. § 156(c);
- d. Current officers and directors of the Debtors who assert Claims for indemnification and/or contribution arising as a result of such officers' or directors' prepetition or postpetition services to the Debtors;
- e. Any person or entity holding a Claim payable to the Court or the United States Trustee Program pursuant to 28 U.S.C. § 1930;
- f. The ABL Lenders, ABL Agent, Term Lenders, Term Agent, Bridge Lenders, and Bridge Agent (as defined in the DIP Motion) on account of any Prepetition Revolving Loan Obligations (as defined in the Interim DIP Order) or the Term Obligations or the Bridge Obligations (as defined in the Interim Term DIP Order);
- g. Any holder of a Claim, other than a 503(b)(9) Claim, allowable under sections 503(b) and 507(a)(2) of the Bankruptcy Code as an administrative expense, which Claims will be subject to a separate bar date;
- h. Any person or entity that holds a Claim that has been allowed by an order of the Court entered on or before the applicable Bar Date;
- i. Any holder of a Claim for which a separate deadline for filing a Proof of Claim is fixed by an order of the Court;
- j. Any entity that holds an interest in the Debtors, whose interest is based exclusively upon the ownership membership interests (including preferred interests), partnership interests, or warrants or rights to purchase, sell, or subscribe to such an interest; provided, however, that interest holders that wish to assert Claims (as opposed to ownership interests) against the Debtors that arise out of or relate to the ownership or purchase of an interest, including Claims arising out of or relating to the sale, issuance, or distribution of the interest, must file Proofs of Claim on or before the applicable Bar Date, unless another exception identified herein applies;
- k. Any holder of a Claim who has already properly filed a Proof of Claim with Donlin Recano or the Clerk of the United States Bankruptcy Court for the District of Delaware on account of such Claim, utilizing a Claim form that substantially conforms to the Proof of Claim Form or Official Form 10; and

- 1. With respect to any chapter 11 administrative claims, any government units not required to file a proof of claim or application for allowance for any claim covered by section 503(b)(1)(B), (c) or (D) of the Bankruptcy Code.
- 6. If the Debtors amend or supplement the Schedules subsequent to the date of service of the Bar Date Notice, the Debtors shall give notice of any such amendment or supplement to the holders of Claims affected thereby, and such holders shall be afforded until the later of (i) the applicable Bar Date or (ii) 5:00 p.m. (prevailing Eastern Time) on the date that is twenty-one (21) days from the date on which such notice is given, to file Proofs of Claim in respect of their Claims (the "Amended Schedules Bar Date"). Any entities who filed a proof of claim before the schedules or statements are amended shall not be required to file another proof of claim.
- 7. Any person or entity holding a Claim arising from the Debtors' rejection of an executory contract or unexpired lease (a "Rejection Damages Claim") shall be afforded the opportunity to file a Proof of Claim on account of such Rejection Damages Claim on or before the later of (i) the applicable Bar Date or (ii) 5:00 p.m. (prevailing Eastern Time) on the date that is thirty (30) days following the entry of the order approving the rejection of the executory contract or unexpired lease pursuant to which the entity asserting the Rejection Damages Claim is a party (the "Rejection Bar Date," and collectively with the General Bar Date, the Government Bar Date, and the Amended Schedules Bar Date, each, a "Bar Date," and collectively, the "Bar Dates"). Notwithstanding the foregoing, a party to an executory contract or unexpired lease that asserts a Claim on account of unpaid amounts accrued and outstanding as of the Petition Date pursuant to such executory contract or unexpired lease (other than a Rejection Damages Claim) must file a Proof of Claim for such amounts on or before the applicable Bar Date unless such party is expressly excluded from filing a Proof of Claim.

- 8. Any holder of a Claim against the Debtors and their estates, other than those not required to file a Proof of Claim pursuant to the terms of this Order, who fails to file a Proof of Claim in accordance with this Order on or before the applicable Bar Date shall not be permitted to (a) vote to accept or reject any plan filed in these chapter 11 cases, (b) participate in any distribution in these chapter 11 cases on account of such Claim, or (c) receive further notices regarding such Claim.
- 9. Within five (5) days of the later of: (i) the entry of this Order and (ii) the filing of the Schedules, the Debtors shall cause copies of the Bar Date Notice and Proof of Claim Form (the "Bar Date Notice Package") to be mailed to all of the Notice Parties by first class mail. On the date the Debtors commence service of the Bar Date Notice Package (the "Service Date"), the Debtors shall also file on the docket of these chapter 11 cases a copy of the Bar Date Notice that specifies the actual date of the General Bar Date.
- 10. On or prior to the Service Date, the Debtors shall post the Proof of Claim Form and Bar Date Notice on the website established by Donlin Recano for these chapter 11 cases (http://www.donlinrecano.com/bt).
- Date Package at any time in advance of the applicable Bar Date as may be necessary, including, without limitation, when (a) notices are returned by the post office with forwarding addresses, (b) certain parties acting on behalf of parties in interest decline to pass along notices to such interested parties and instead return such interested parties' names and addresses to the Debtors for direct mailing by the Debtors, and (c) additional potential claimants subsequently become known to the Debtors as the result of the Bar Date noticing process or otherwise. Notwithstanding the foregoing, the Debtors shall not be required to provide any additional notice

to any party to whom the Debtors mailed the Bar Date Package in accordance with the terms of this Order and such notice was returned to the Debtors as undeliverable without a forwarding address.

- 12. The Proof of Claim Form and the Bar Date Notice, in substantially the forms attached hereto as **Exhibit 1** and **Exhibit 2**, respectively, are hereby approved in all respects. Prior to mailing the Bar Date Notice and the Proof of Claim Forms, the Debtors may fill in, or cause to be filled in, any missing dates and other information, correct any typographical errors, conform the provisions thereof to the provisions of this Order, and make such other, non-material changes as the Debtors deem necessary or appropriate.
- Date, in substantially the form attached hereto as **Exhibit 3** (the "**Publication Notice**"), once in *The Wall Street Journal, The New York Times*, or *USA Today*, as determined by the Debtors, in their sole discretion, at least twenty-one (21) days prior to the General Bar Date, which publication is hereby approved in all respects and shall be deemed good, adequate, and sufficient publication notice of the Bar Date. Prior to publishing the Publication Notice, the Debtors may fill in, or caused to be filled in, any missing dates and other information, correct any typographical errors, conform the provisions thereof to the provisions of this Order and make such other, non-material changes as the Debtors deem necessary or appropriate.
- 14. The Debtors and Donlin Recano are authorized and empowered to take such steps and to perform such acts as may be necessary to implement and effectuate the terms of this Order.
- 15. Nothing in this Order shall impair, prejudice, waive or otherwise affect the rights of the Debtors and estates to: (i) dispute, or to assert offsets or defenses to, any Claim reflected

in the Schedules or any Proof of Claim filed in these chapter 11 cases, as to amount, liability, characterization or otherwise; (ii) subsequently designate any Claim reflected in the Schedules as disputed, contingent or unliquidated; and (iii) seek a further order of this Court establishing such other deadlines and bar dates in these chapter 11 cases as may be necessary or advisable.

16. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: Wilmington, Delaware, 2015

UNITED STATES BANKRUPTCY JUDGE

EXHIBIT 1

Proof of Claim Form

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UNITED STATES BANKRUPTO	Y COURT DISTRICT	OF DELAWARE		PROOF OF CLAIM
IN RE: BOOMERANG TUBE, LL		15-11247(MFW)		THE COLUMN
Name of Debtor:		Case Number:		·
NOTE: This form should not be used arising under section 503(b)(9).	to make a claim for an adr	ministrative expense o	ther than a claim	
Name and Address of Creditor (the pe	rson or other entity to wh	om the debtor owes n	noney or property):	1
				COURT USE ONLY
Name and address where notices should be sent:			Check this box if this claim amends a previously filed claim.	
			a previously filed claim. Court Claim Number:	
				(If known)
Telephone number:	email:	ram abayalı		Filed on:
Name and address where payment should be sent (if different from above):			anyone else has filed a proof of claim	
Tolophona number.			Check this box if you are aware that anyone else has filed a proof of claim relating to this claim. Attach copy of statement giving particulars.	
Telephone number: 1. Amount of Claim as of Date Case f	email: Filed: \$			
If all or part of your claim is secured,	complete item 4.			
If all or part of your claim is entitled to Check this box if claim includes int	o priority, complete item be erest or other charges in a	o. addition to the principa	I amount of the claim	Attach a statement
that itemizes interest or charges.				
2. Basis for Claim: (See instruction #2 on reverse side	. 1			
3. Last four digits of any number	3a. Debtor may have sch	neduled account as:	3b. Uniform Claim Ide	entifier (optional):
by which creditor identifies debtor:			10	
4. Secured Claim (See instruction #4	(See instruction #3a on on reverse side.)		Amount of arreara	on reverse side.) ge and other charges, as of the time case was
Check the appropriate box if the clusetoff, attach required redacted do	aim is secured by a lien or			ecured claim, if any:
Nature of property or right of setof			Basis for perfection	n·
Describe:				
Value of Property:\$			Amount of Secure	d Claim:
Annual Interest Rate% ☐ (when case was filed)			Amount of Unsecu	.1
5 Amount of Claim Entitled to: (i) Price	ority under 11 U.S.C. § 50	7(a) or (ii) Administra	tive Expense under 1	1 U.S.C. § 503(b)(9). If any part of the
claim falls into one of the following ca	er 🔲 Wages, salaries, o	pecitying the priority a r commissions (up to	\$12,475*) 🔲 Contril	butions to an
11 U.S.C. §507(a)(1)(A) or (a)(1)(B). earned within 180	days before the case	was filed employ	yee benefit plan - S.C. §507(a)(5).
	earlier - 11 U.S.C.	siness ceased, whiche §507(a)(4).	veris 110.3	Amount entitled to priority:
☐ Up to \$2,775* of deposits toward				
purchase, lease, or rental of prope or services for personal, family, or		1)(8).		able paragraph of S.C. §507(a)(_).
household use - 11 U.S.C. §507(a			,, ,,,	,
☐ Value of goods received by the del	btor Amount entitled to	administrative expen	se under § 503(b)(9):	
within 20 days before the date of commencement of the case - 11 U	I.S.C. a			
5 E O 2 (b) (O)	V	ere thereafter with res	nect to cases comme	nced on or after the date of adjustment.
6. Credits: The amount of all payments	s on this claim has been c	redited for the purpos	of making this proof	of claim. (See instruction #6 on reverse side)
7. Documents: Attached are redacted	copies of any documents	that support the clair	n, such as promissory	notes, purchase orders, invoices, itemized
statements of running accounts, contracts, judgments, mortgages, and security agreements, or in the case of a claim based upon an open-end or revolving consumer credit agreement, a statement providing the information required by FRBP 3001(c)(3)(A). If the claim is secured, box 4 has				
been completed, and redacted copie	es of documents providing	evidence of perfection	n of a security interes	st are attached. If the claim is secured by
the debtor's principal residence, the			led with this claim.	
(See instruction #7, and the definiti DO NOT SEND ORIGINAL DOCUMENT	on of " redacted " on revers	<i>se side.)</i> NTS MAY BE DESTRO	YED AFTER SCANNII	NG.
If the documents are not available, ple	ase explain:			
BAR DATE - THE ORIGINAL OF THIS I	PROOF OF CLAIM MUST I	BE SENT SO THAT <u>IT</u>	IS RECEIVED ON OR	BEFORE 5:00 P.M., PREVAILING
EASTERN TIME, ON, 2015. IF PROOF OF CLAIM IS SENT BY MAIL, SEND TO		IE DONNE NE CI AIM IS S	ENT BY OVERNIGHT COUR	IER OR HAND DELIVERY, SEND TO:
DONLIN, RECANO & COMPANY, INC.	;	DONLIN, RECANO & CO		EL OIL HARD BELLEVENT, GENERAL CO.
RE: BOOMERANG TUBE, LLC, ET AL. P.O. BOX 199001, BLYTHEBOURNE STATION		RE: BOOMERANG TUB 6201 15TH AVENUE	, LLC, ET AL.	
NEW YORK, NY 11219	•	BROOKLYN, NY 11219		
Please see instructions on reverse side				
8. Signature: (See instruction #8 on re Check the appropriate box.		_		
☐ I am the creditor. ☐ I am the credit	or's authorized agent.	I am the truste or their authori		I am a guarantor, surety, indorser, or other codebtor. (See Bankruptcy Rule 3005.)
		(See Bankrunte	v Rule 3004.)	
I declare under penalty of perjury that and reasonable belief.	the information provided i	in this claim is true an	u correct to the best	or my knowledge, information,
Print Name:		Telephone	number:	email:
Company:				
Address and telephone number (if diffe	erent from notice address	above):		
		(Signature)	(Date)

Debtor NameCase No.Boomerang Tube, LLC15-11247BTCSP, LLC15-11248BT Financing, Inc.15-11249

INSTRUCTIONS FOR PROOF OF CLAIM FORM

The instructions and definitions below are general explanations of the law. In certain circumstances, such as bankruptcy cases not filed voluntarily by the debtor, exceptions to these general rules may apply.

Items to be completed in Proof of Claim form (If not already filled in)

Name of Debtor and Case Number:

A complete list of Debtors with corresponding case numbers is listed above. You must fill in the specific Debtor name and case number against which your claim is being asserted. If you are asserting claims against more than one Debtor, you MUST file a separate proof of claim for each debtor.

Creditor's Name and Address:

Fill in the name of the person or entity asserting a claim and the name and address of the person who should receive notices issued during the bankruptcy case. A separate space is provided for the payment address if it differs from the notice address. The creditor has a continuing obligation to keep the court informed of its current address. See Federal Rule of Bankruptcy Procedure (FRBP) 2002(g).

1. Amount of Claim as of Date Case Filed:

State the total amount owed to the creditor on the date of the bankruptcy filing. Follow the instructions concerning whether to complete items 4 and 5. Check the box if interest or other charges are included in the claim.

2. Basis for Claim:

State the type of debt or how it was incurred. Examples include goods sold, money loaned, services performed, personal injury/wrongful death, car loan, mortgage note, and credit card. If the claim is based on delivering health care goods or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information. You may be required to provide additional disclosure if an interested party objects to the claim.

3. Last Four Digits of Any Number by Which Creditor Identifies Debtor:

State only the last four digits of the debtor's account or other number used by the creditor to identify the debtor.

3a. Debtor May Have Scheduled Account As:

Report a change in the creditor's name, a transferred claim, or any other information that clarifies a difference between thisproof of claim and the claim as scheduled by the debtor.

3b. Uniform Claim Identifier:

If you use a uniform claim identifier, you may report it here. A uniform claim identifier is an optional 24-character identifier that certain large creditors use to facilitate electronic payment in chapter 13 cases.

4. Secured Claim:

Check whether the claim is fully or partially secured. Skip this section if the claim is entirely unsecured. (See DEFINITIONS, below.) If the claim is

secured, check the box for the nature and value of property that secures the claim, attach copies of lien documentation, and state, as of the date of the bankruptcy filing, the annual interest rate (and whether it is fixed or variable) and the amount past due on the claim.

Amount of Claim Entitled to (i) Priority Under 11 U.S.C. §507(a) or (ii) Administrative Expense Under 11 U.S.C. §503(b)(9):

If any portion of your claim falls into any category shown, check the appropriate box(es) and state the amount entitled to priority or administrative expense. (See DEFINITIONS, below.) A claim may be partly priority and partly non-priority. For example, in some of the categories, the law limits the amount entitled to priority.

6. Credits:

An authorized signature on this proof of claim serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

7. Documents:

Attach redacted copies of any documents that show the debt exists and a lien secures the debt. You must also attach copies of documents that evidence perfection of any security interest and documents required by FRBP 3001(c) for claims based on an open-end or revolving consumer credit agreement or secured by a security interest in the debtor's principal residence. You may also attach a summary in addition to the documents themselves. FRBP 3001(c) and (d). If the claim is based on delivering health care goods or services, limit disclosing confidential health care information. Do not send original documents, as attachments may be destroyed after scanning.

8. Date and Signature:

The individual completing this proof of claim must sign and date it. FRBP 9011. If the claim is filed electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what constitutes a signature. If you sign this form, you declare under penalty of perjury that the information provided is true and correct to the best of your knowledge, information, and reasonable belief. Your signature is also a certification that the claim meets the requirements of FRBP 9011(b). Whether the claim is filed electronically or in person, if your name is on the signature line, you are responsible for the declaration. Print the name and title, if any, of the creditor or other person authorized to file this claim. State the filer's address and telephone number if it differs from the address given on the top of the form for purposes of receiving notices. If the claim is filed by an authorized agent, provide both the name of the individual filing the claim and the name of the agent. If the authorized agent is a servicer, identify the corporate servicer as the company. Criminal penalties apply for making a false statement on a proof of claim.

- DEFINITIONS

Debtor

A debtor is the person, corporation, or other entity that has filed a bankruptcy case.

Creditor

A creditor is a person, corporation, or other entity to whom debtor owes a debt that was incurred before before the date of the bankruptcy filing. See 11 U.S.C. § 101(10).

Claim

A claim is the creditor's right to receive payment for a debt owed by the debtor on the date of the bankruptcy filing. See 11 U.S.C. § 101(5). A claim may be secured or unsecured.

Proof of Claim

A proof of claim is a form used by the creditor to indicate the amount of the debt owed by the debtor on the date of the bankruptcy filing.

Secured Claim Under 11 U.S.C. § 506(a)

A secured claim is one backed by a lien on property of the debtor. The claim is secured so long as the creditor has the right to be paid from the property prior to other creditors. The amount of the secured claim cannot exceed the value of the property. Any amount owed to the creditor in excess of the value of the property is an unsecured claim. Examples of liens on property include a mortgage on real estate or a security interest in a car.

A lien may be voluntarily granted by a debtor or may be obtained through a court proceeding. In some states, a court judgment is a lien. A claim also may be secured if the creditor owes the debtor money (has a right to setoff).

Unsecured Clain

An unsecured claim is one that does not meet the requirements of a secured claim. A claim may be partly unsecured if the amount of the claim exceeds the value of the property on which the creditor has a lien.

Claim Entitled to Priority Under 11 U.S.C. §507(a)

Priority claims are certain categories of unsecured claims that are paid from the available money or property in a bankruptcy case before other unsecured claims.

Claim Entitled to Administrative Expense Under 11 U.S.C. §503(b)(9)

Administrative expense priority claims under section 503 (b)(9) of the Bankruptcy Code include those claims for the value of any goods received by the debtor, within 20 days before the date of commencement of a case under the Bankuptcy Code in which the goods have been sold to the debtor in the ordinary course of such debtor's business.

Redacte

A document has been redacted when the person filing it has masked, edited out, or otherwise deleted, certain information. A creditor must show only the last four digits of any social-security, individual's tax-identification, or financial-account number, only the initials of a minor's name and only the year of any person's date of birth.

- INFORMATION -

If the claim is based on the delivery of health care goods or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information.

Evidence of Perfection

Evidence of perfection may include a mortgage, lien, certificate of title, financing statement, or other document showing that the lien has been filed or recorded.

Acknowledgment of filing of Claim

To receive acknowledgment of your filing, you may either enclose a stamped self-addressed envelope and a copy of this proof of claim or you may access the Claims Agent's website (www.donlinrecano.com/bt) to view your filed proof of claim.

Offers to Purchase a Claim

Certain entities are in the business of purchasing claims for an amount less than the face value of the claims. One or more of these entities may contact the creditor and offer to purchase the claim. Some of the written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court or the debtor. The creditor has no obligation to sell its claim. However, if the creditor decides to sell its claim, any transfer of such claim is subject to FRBP 3001(e), any applicable provisions of the Bankruptcy Code (11 U.S.C. § 101 et seq.), and any applicable orders of the bankruptcy court.

EXHIBIT 2

Bar Date Notice

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
BOOMERANG TUBE, LLC, a Delaware limited liability company, et al.,1	Case No. 15-11247 (MFW)
Debtors.	Jointly Administered
Detions.	Docket Ref. Nos. 97 and

NOTICE TO ALL CREDITORS OF BAR DATES FOR FILING PROOFS OF CLAIM

On June 9, 2015 (the "Petition Date"), the above captioned debtors and debtors in possession (each, a "Debtor," and collectively, the "Debtors") each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532. (the "Bankruptcy Code"), in the United States Bankruptcy Court for the District of Delaware (the "Court").

On _____, 2015 the Court entered an order [D.I. ___] (the "Bar Date Order")² establishing certain claims bar dates in these chapter 11 cases. By the Bar Date Order, the Court established _____, 2015 at 5:00 p.m. (prevailing Eastern Time) as the general claims bar date (the "General Bar Date"). Except as described below, the Bar Date Order requires all persons or entities that have or assert any prepetition claims (each, a "Claim") against the Debtors to file proofs of claim with Donlin, Recano & Company, Inc. ("Donlin Recano"), the claims and noticing agent in these chapter 11 cases, so that their proofs of claim are actually received by Donlin Recano on or before the General Bar Date.

For your convenience, enclosed with this Notice is a proof of claim form, which identifies on its face the amount, nature, and classification of your Claim(s), if any, listed in the Debtors' schedules of assets and liabilities filed in these chapter 11 cases (the "Schedules"). If the Debtors believe that you hold a Claim against more than one Debtor, you will receive multiple proof of claim forms, each of which will reflect the nature and amount of your Claim listed in the Schedules.

THE FACT THAT YOU HAVE RECEIVED THIS NOTICE DOES NOT MEAN THAT YOU HAVE A CLAIM OR THAT THE DEBTORS BELIEVE YOU HAVE A CLAIM.

KEY DEFINITIONS

As used in this Notice, the term "entity" (or "entities") has the meaning given to it in section 101(15) of the Bankruptcy Code, and includes, but is not limited to, all persons (including, without limitation, individuals, partnerships and corporations), estates, trusts, and governmental units.

As used in this Notice, the term "governmental unit" (or "governmental units") has the meaning given to it in section 101(27) of the Bankruptcy Code and includes, without limitation, the United States; states; commonwealths; districts; territories; municipalities; foreign states; or departments, agencies or instrumentalities of the United States.

The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Boomerang Tube, LLC (9415); BTCSP, LLC (7632); and BT Financing, Inc. (6671). The location of the Debtors' corporate headquarters is 14567 North Outer Forty, Suite 500, Chesterfield, Missouri 63017.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Bar Date Order.

As used in this Notice, the term "Claim" (or "Claims") shall mean, as to or against the Debtors and in accordance with section 101(5) of the Bankruptcy Code: (a) any right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, legal, equitable, secured or unsecured; or (b) any right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured or unsecured.

WHO MUST FILE A PROOF OF CLAIM AND THE APPLICABLE BAR DATES

The Bar Dates

The Bar Date Order established the following bar dates for filing proofs of claim in these chapter

11 cases:

- a. <u>The General Bar Date</u>: Pursuant to the Bar Date Order, the last date and time for all persons and entities, (including, without limitation, individuals, partnerships, corporations, joint ventures, and trusts) that assert a Claim, including, without limitation, any claims under section 503(b)(9) of the Bankruptcy Code (each, a "503(b)(9) Claim"), secured claims, and priority claims, which arose on or prior to the Petition Date, to file a Proof of Claim on account of such Claim is the General Bar Date (as defined above).
- b. <u>The Government Bar Date</u>: Pursuant to the Bar Date Order, the last date and time for governmental units to file a Proof of Claim on account of a Claim against the Debtors is <u>December 7, 2015 at 5:00 p.m. (prevailing Eastern Time)</u> (the "Government Bar Date").
- c. The Amended Schedules Bar Date: If the Debtors amend or supplement their Schedules subsequent to the service of this Notice, the Debtors will give notice of any such amendment or supplement to the holders of Claims affected thereby, and such holders shall be afforded the later of (i) the applicable Bar Date or (ii) 5:00 p.m. (prevailing Eastern Time) on the date that is twenty-one (21) days from the date on which such notice is given, to file Proofs of Claim in respect of their affected Claims (the "Amended Schedules Bar Date"). Any entities who filed a proof of claim before the schedules or statements are amended shall are not required to file another proof of claim.
- d. The Rejection Bar Date: The last date and time for any person or entity (including, without limitation, individuals, partnerships, corporations, joint ventures, and trusts) whose Claim arises out of the Court-approved rejection of an executory contract or unexpired lease in accordance with section 365 of the Bankruptcy Code (a "Rejection Damages Claim") to file a Proof of Claim on account of such Rejection Damages Claim is the later of (i) the applicable Bar Date or (ii) 5:00 p.m. (prevailing Eastern Time) on the date that is thirty (30) days following the entry of the order approving the rejection of the executory contract or unexpired lease pursuant to which the entity asserting the Rejection Damages Claim is a party (collectively with the General Bar Date, the Government Bar Date and the Amended Schedules Bar Date, each, a "Bar Date").

Entities That Must File Proof of Claim by the Applicable Bar Date

Subject to the terms described above for holders of a Rejection Damages Claim, without limitation, each of the following entities that fails to file a Proof of Claim by the applicable Bar Date with respect to a Claim shall not be permitted to (a) vote to accept or reject any plan filed in these chapter 11 cases, (b) participate in any distribution in these chapter 11 cases on account of such Claim, or (c) receive further notices regarding such Claim:

- a. any entity whose prepetition claim against the Debtors is not listed in the Schedules or whose prepetition claim is listed in the Schedules but is listed therein as disputed, contingent, and/or unliquidated;
- b. any entity that believes that its prepetition claim is improperly classified in the Schedules or is listed in an incorrect amount and that desires to have its claim allowed in a classification or amount other than that identified in the Schedules; and
- c. any entity that believes that its prepetition claim as listed in the Schedules is not an obligation of the specific Debtor against which the claim is listed and that desires to have its claim allowed against a Debtor other than that identified in the Schedules.

Entities Not Required to File Proofs of Claim by the Applicable Bar Date

The Bar Date Order further provides that the following persons and entities need not file proofs of claim on or before the applicable Bar Date:

- a. Any person or entity whose Claim is listed on the Schedules and (i) whose Claim is not described thereon as "disputed," "contingent," and/or "unliquidated," (ii) who does not dispute the amount or classification of the Claim set forth in the Schedules, and (iii) who does not dispute that the Claim is an obligation of the specific Debtor against which the Claim is listed on the Schedules;
- b. Any person or entity whose Claim has been paid in full by the Debtors;
- c. Professionals retained by the Debtors or the Committee pursuant to orders of the Court who assert administrative claims for fees and expenses subject to the Court's approval pursuant to sections 328, 330, 331, and 503(b) of the Bankruptcy Code or 28 U.S.C. § 156(c);
- d. Current officers and directors of the Debtors who assert Claims for indemnification and/or contribution arising as a result of such officers' or directors' prepetition or postpetition services to the Debtors;
- e. Any person or entity holding a Claim payable to the Court or the United States Trustee Program pursuant to 28 U.S.C. § 1930;
- f. The ABL Lenders, ABL Agent, Term Lenders, Term Agent, Bridge Lenders, and Bridge Agent (as defined in the DIP Motion) on account of any Prepetition Revolving Loan Obligations (as defined in the Interim DIP Order) or the Term Obligations or the Bridge Obligations (as defined in the Interim Term DIP Order);
- g. Any holder of a Claim, other than a 503(b)(9) Claim, allowable under sections 503(b) and 507(a)(2) of the Bankruptcy Code as an administrative expense, which Claims will be subject to a separate bar date;
- h. Any person or entity that holds a Claim that has been allowed by an order of the Court entered on or before the applicable Bar Date;
- i. Any holder of a Claim for which a separate deadline for filing a Proof of Claim is fixed by an order of the Court;
- j. Any entity that holds an interest in the Debtors, whose interest is based exclusively upon the ownership of membership interests (including preferred interests), partnership interests, or warrants or rights to purchase, sell, or subscribe to such an interest; provided,

however, that interest holders that wish to assert Claims (as opposed to ownership interests) against the Debtors that arise out of or relate to the ownership or purchase of an interest, including Claims arising out of or relating to the sale, issuance, or distribution of the interest, must file Proofs of Claim on or before the applicable Bar Date, unless another exception identified herein applies;

- k. Any holder of a Claim who has already properly filed a Proof of Claim with Donlin Recano or the Clerk of the United States Bankruptcy Court for the District of Delaware on account of such Claim, utilizing a Claim form that substantially conforms to the Proof of Claim Form or Official Form 10; and
- 1. With respect to any chapter 11 administrative claims, any government units not required to file a proof of claim or application for allowance for any claim covered by section 503(b)(1)(B), (c) or (D) of the Bankruptcy Code.

CONSEQUENCES OF FAILURE TO FILE PROOF OF CLAIM

Any person, entity, or governmental unit not excepted from filing a Proof of Claim pursuant to the Bar Date Order, that fails to do so by the applicable Bar Date and in the form and manner provided for in the Bar Date Order, shall not be permitted to (a) vote to accept or reject any plan filed in these chapter 11 cases, (b) participate in any distribution in these chapter 11 cases on account of such Claim, or (c) receive further notices regarding such Claim.

If it is unclear from the Schedules whether your Claim is disputed, contingent, and/or unliquidated or is otherwise properly listed and classified, you must file a Proof of Claim on or before the applicable Bar Date. Any person, entity, or governmental unit that relies on the information in the Schedules bears full and absolute responsibility for determining that its Claim is accurately listed therein.

RESERVATION OF RIGHTS

Nothing in the Bar Date Order impairs, prejudices, waives or otherwise affects the rights of the Debtors and estates to: (i) dispute, or to assert offsets or defenses to, any Claim reflected in the Schedules or any Proof of Claim filed in these chapter 11 cases, as to amount, liability, characterization or otherwise; (ii) subsequently designate any Claim reflected in the Schedules as disputed, contingent or unliquidated; and (iii) to seek a further order of the Court establishing such other deadlines and bar dates in these chapter 11 cases as may be necessary or advisable.

PROCEDURES FOR FILING PROOFS OF CLAIM

Except as otherwise provided herein, Proofs of Claim must be filed so as to be <u>actually received</u> no later than 5:00 p.m. (prevailing Eastern Time) on the applicable Bar Date (i) by mail at the following address:

Donlin, Recano & Company, Inc. Re: Boomerang Tube, LLC, et al. P.O. Box 199001 Blythebourne Station Brooklyn, NY 11219

or (ii) by courier, hand delivery, or overnight delivery at the following address:

Donlin, Recano & Company, Inc. Re: Boomerang Tube, LLC, et al. 6201 15th Avenue Brooklyn, NY 11219

A Proof of Claim will be deemed timely only if the original Proof of Claim is actually received by Donlin Recano on or before the applicable Bar Date. Proofs of Claim may not be sent by facsimile, telecopy, or electronic mail. A claimant who wishes to receive acknowledgement of receipt of its Proof of Claim may submit a copy of the Proof of Claim and a self-addressed, stamped envelope to Donlin Recano along with the original Proof of Claim.

If you file a Proof of Claim, your Proof of Claim must: (a) be written in the English language; (b) be denominated in lawful currency of the United States as of the Petition Date; (c) conform substantially to the enclosed proof of claim form or Official Bankruptcy Form No. 10 ("Official Form 10");3 (d) set forth with specificity the legal and factual basis for the alleged Claim; (e) include supporting documentation (or, if such documentation is voluminous, a summary of such documentation) or an explanation as to why such documentation is not available; and (f) be signed by the claimant or, if the claimant is not an individual, by an authorized agent of the claimant.

ADDITIONAL INFORMATION

You may be listed as the holder of a Claim against the Debtors in the Schedules. If you hold or assert a Claim that is not listed in the Schedules, or if you disagree with the amount, characterization or priority of your Claim as listed in the Schedules, or your Claim is listed in the Schedules as "contingent," "unliquidated," and/or "disputed," or you dispute that the Claim is an obligation of the specific debtor entity against which the Claim is listed in the Schedules, you will be forever barred from asserting such Claim if you do not timely file a Proof of Claim in the manner provided for in the Bar Date Order. Copies of the Schedules and the Bar Date Order are available for inspection during regular business hours at the Office of the Clerk of the Court, 3rd Floor, 824 N. Market Street, Wilmington, Delaware 19801. In addition, copies of the Schedules and the Bar Date Order may be viewed on the internet for a fee at the Court's website (http://www.deb.uscourts.gov/) by following directions for accessing the Court's electronic filing system on such website, or free of charge on Donlin Recano's website for these chapter 11 cases (http://www.donlinrecano.com/bt).

Questions concerning the contents of this Notice and requests for additional Proof of Claim forms should be directed to Donlin Recano at (212) 771-1128. Please note that Donlin Recano's staff is not permitted to give legal advice. You should consult with your own attorney for assistance regarding any other inquiries, such as questions concerning the completion or filing of a Proof of Claim.

Dated:

June ____, 2015 Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

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Proposed Counsel for the Debtors and Debtors in Possession

³ Official Form 10 can be found at http://www.uscourts.gov/forms/bankruptcy-forms, the Official Website for the United States Bankruptcy Courts.

EXHIBIT 3

Publication Notice

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

200000	Docket Ref. Nos. 97 and
Debtors.	Jointly Administered
BOOMERANG TUBE, LLC, a Delaware limited liability company, et al., 1	Case No. 15-11247 (MFW)
In re:	Chapter 11

NOTICE TO ALL CREDITORS OF BAR DATES FOR FILING PROOFS OF CLAIM

On June 9, 2015 (the "Petition Date"), the above captioned debtors and debtors in possession (the "Debtors") each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532. (the "Bankruptcy Code"), in the United States Bankruptcy Court for the District of Delaware (the "Court"). On ____, 2015, the Court entered an order (the "Bar Date Order") establishing certain claims bar dates in these chapter 11 cases. Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Bar Date Order. By the Bar Date Order, the Court established , 2015 at 5:00 p.m. (prevailing Eastern Time) as the general claims bar date (the "General Bar Date"). Except as described below, the Bar Date Order requires all entities that have or assert any pre-petition claims (a "Claim") against the Debtors and their estates to file proofs of claim with Donlin, Recano & Company, Inc. ("Donlin Recano"), the claims and noticing agent in these chapter 11 cases, so that their proofs of claim are actually received by Donlin Recano on or before 5:00 p.m. (prevailing Eastern Time) on the General Bar Date. The term "Claim" means, as to or against the Debtors and in accordance with section 101(5) of the Bankruptcy Code: (a) any right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, legal, equitable, secured, or unsecured; or (b) any right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured.

The Bar Date Order establishes the following bar dates for filing proofs of claim in these chapter 11 cases:

The General Bar Date: Pursuant to the Bar Date Order, the last date and time for all persons and entities, (including, without limitation, individuals, partnerships, corporations, joint ventures, and trusts) that assert a Claim, including, without limitation, any claims under section 503(b)(9) of the Bankruptcy Code (each, a "503(b)(9) Claim"), secured claims, and priority claims, which arose on or prior to the Petition Date, to file Proofs of Claim on account of such Claim is the General Bar Date.

<u>The Government Bar Date</u>: Pursuant to the Bar Date Order, the last date and time for governmental units (as defined in section 101(27) of the Bankruptcy Code) to file Proofs of Claim against the Debtors and their estates is <u>December 7, 2015 at 5:00 p.m. (prevailing Eastern Time)</u> (the "Government Bar Date").

The Amended Schedules Bar Date: If the Debtors amend or supplement their Schedules subsequent to the publication of this Notice, the Debtors will give notice of any such amendment or supplement to the holders of Claims affected thereby, and such holders shall be afforded the later of (i) the applicable Bar Date or (ii) 5:00 p.m. (prevailing Eastern Time) on the date that is twenty-one (21) days from the date on which such notice is given, to file Proofs of Claim in respect of their Claims (the "Amended Schedules Bar Date"). Any entities who filed a proof of claim before the schedules or statements are amended shall are not required to file another proof of claim.

The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Boomerang Tube, LLC (9415); BTCSP, LLC (7632); and BT Financing, Inc. (6671). The location of the Debtors' corporate headquarters is 14567 North Outer Forty, Suite 500, Chesterfield, Missouri 63017.

The Rejection Bar Date: The last date and time for any person or entity (including, without limitation, individuals, partnerships, corporations, joint ventures, and trusts) whose Claim arises out of the Court-approved rejection of an executory contract or unexpired lease in accordance with section 365 of the Bankruptcy Code (each, a "Rejection Damages Claim") to file a Proof of Claim on account of such Rejection Damages Claim is the later of (i) the applicable Bar Date or (ii) 5:00 p.m. (prevailing Eastern Time) on the date that is thirty (30) days following the entry of the order approving the rejection of the executory contract or unexpired lease pursuant to which the entity asserting the Rejection Damages Claim is a party (collectively with the General Bar Date, the Government Bar Date and the Amended Schedules Bar Date, each, a "Bar Date").

Entities That Must File Proofs of Claim by the Applicable Bar Date: Subject to the terms described above for holders of a Rejection Damages Claim, without limitation, each of the following entities that fails to file a Proof of Claim by the applicable Bar Date with respect to a Claim shall not be permitted to (a) vote to accept or reject any plan filed in these chapter 11 cases, (b) participate in any distribution in these chapter 11 cases on account of such Claim, or (c) receive further notices regarding such Claim: (i) any entity whose Claim against the Debtors is not listed in the Debtors' Schedules or whose Claim is listed in the Schedules but is listed therein as disputed, contingent, and/or unliquidated; (ii) any entity that believes that its Claim is improperly classified in the Schedules or is listed in an incorrect amount and that desires to have its Claim allowed in a classification or amount other than that identified in the Schedules; and (iii) any entity that believes that its Claim as listed in the Schedules is not an obligation of the specific Debtor against which the Claim is listed and that desires to have its Claim allowed against a Debtor other than that identified in the Schedules.

Entities Not Required to File Proofs of Claim by the Applicable Bar Date: The Bar Date Order further provides that the following persons and entities need not file proofs of claim on or before the applicable Bar Date: (a) any person or entity whose Claim is listed on the Schedules and (i) whose Claim is not described thereon as "disputed," "contingent," and/or "unliquidated," (ii) who does not dispute the amount or classification of the Claim set forth in the Schedules, and (iii) who does not dispute that the Claim is an obligation of the specific Debtor against which the Claim is listed on the Schedules; (b) any person or entity whose Claim has been paid in full by the Debtors; (c) professionals retained by the Debtors or the Committee pursuant to orders of the Court who assert administrative claims for fees and expenses subject to the Court's approval pursuant to sections 328, 330, 331, and 503(b) of the Bankruptcy Code or 28 U.S.C. § 156(c); (d) current officers and directors of the Debtors who assert Claims for indemnification and/or contribution arising as a result of such officers' or directors' prepetition or postpetition services to the Debtors; (e) any person or entity holding a Claim payable to the Court or the United States Trustee Program pursuant to 28 U.S.C. § 1930; (f) The ABL Lenders, ABL Agent, Term Lenders, Term Agent, Bridge Lenders, and Bridge Agent (as defined in the DIP Motion) on account of any Prepetition Revolving Loan Obligations (as defined in the Interim DIP Order) or the Term Obligations or the Bridge Obligations (as defined in the Interim Term DIP Order); (g) any holder of a Claim, other than a 503(b)(9) Claim, allowable under sections 503(b) and 507(a)(2) of the Bankruptcy Code as an administrative expense, which Claims will be subject to a separate bar date; (h) any person or entity that holds a Claim that has been allowed by an order of the Court entered on or before the applicable Bar Date; (i) any holder of a Claim for which a separate deadline for filing a Proof of Claim is fixed by an order of the Court; (i) any entity that holds an interest in the Debtors, whose interest is based exclusively upon the ownership of membership interests (including preferred interests), partnership interests, or warrants or rights to purchase, sell, or subscribe to such an interest; provided, however, that interest holders that wish to assert Claims (as opposed to ownership interests) against the Debtors that arise out of or relate to the ownership or purchase of an interest, including Claims arising out of or relating to the sale, issuance, or distribution of the interest, must file Proofs of Claim on or before the applicable Bar Date, unless another exception identified herein applies; (k) any holder of a Claim who has already properly filed a Proof of Claim with Donlin Recano or the Clerk of the Court on account of such Claim, utilizing a Claim form that substantially conforms to the Proof of Claim Form or Official Form 10; and (1) with respect to any chapter 11 administrative claims, any government units not required to file a proof of claim or application for allowance for any claim covered by section 503(b)(1)(B), (c) or (D) of the Bankruptcy Code.

Consequences of Failure to File Proof of Claim: Any person, entity, or governmental unit not excepted from filing a Proof of Claim pursuant to the Bar Date Order, that fails to do so by the applicable Bar Date and in the form and manner provided for in the Bar Date Order shall not be permitted to (a) vote to accept or reject any plan filed in these chapter 11 cases, (b) participate in any distribution in these chapter 11 cases on

account of such Claim, or (c) receive further notices regarding such Claim. If it is unclear from the Schedules whether your Claim is disputed, contingent, and/or unliquidated or is otherwise properly listed and classified, you must file a Proof of Claim on or before the applicable Bar Date. Any person, entity, or governmental unit that relies on the information in the Schedules bears full and absolute responsibility for determining that its Claim is accurately listed therein.

Procedures for Filing Proofs of Claim: A Proof of Claim will be deemed timely only if the original Proof of Claim is actually received by Donlin Recano on or before the applicable Bar Date (i) by mail at the following address: Donlin, Recano & Company, Inc., Re: Boomerang Tube, LLC, et al., P.O. Box 199001, Blythebourne Station, Brooklyn, NY 11219; or (ii) by courier, hand delivery, or overnight delivery at the following address: Donlin, Recano & Company, Inc., Re: Boomerang Tube, LLC, et al., 6201 15th Avenue, Brooklyn, NY 11219. Proofs of Claim may not be sent by facsimile, telecopy or electronic mail. A claimant who wishes to receive acknowledgement of receipt of its Proof of Claim form may submit a copy of the Proof of Claim form and a self-addressed, stamped envelope to Donlin Recano along with the original Proof of Claim. If you file a Proof of Claim, your Proof of Claim must: (a) be written in the English language; (b) be denominated in lawful currency of the United States as of the Petition Date; (c) conform substantially to Official Bankruptcy Form No. 10; (d) set forth with specificity the legal and factual basis for the alleged Claim; (e) include supporting documentation (or, if such documentation is voluminous, a summary of such documentation) or an explanation as to why such documentation is not available; and (f) be signed by the claimant or, if the claimant is not an individual, by an authorized agent of the claimant.

Additional Information: Copies of the Schedules and the Bar Date Order are available for inspection during regular business hours at the Office of the Clerk of the Court, 3rd Floor, 824 N. Market Street, Wilmington, Delaware 19801. In addition, copies of the Schedules and the Bar Date Order may be viewed on the internet for a fee at the Court's website (http://www.deb.uscourts.gov/) by following directions for accessing the Court's electronic filing system on such website, or free of charge on Donlin Recano's website for these chapter 11 cases (http://www.donlinrecano.com/bt). Questions concerning the contents of this Notice and requests for additional Proof of Claim forms should be directed to Donlin Recano at (212) 771-1128. Please note that Donlin Recano's staff is not permitted to give legal advice. You should consult with your own attorney for assistance regarding any other inquiries, such as questions concerning the completion or filing of a Proof of Claim.

Dated:

June ____, 2015 Wilmington, Delaware

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Proposed Counsel for the Debtors and Debtors in Possession