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

Re: Docket Nos. 470 & 489

NOTICE OF FILING OF PLAN SUPPLEMENT TO THE DEBTORS' AMENDED JOINT PREARRANGED CHAPTER 11 PLAN DATED SEPTEMBER 4, 2015

PLEASE TAKE NOTICE THAT on September 11, 2015, the above-captioned debtors and debtors in possession (collectively, the "<u>Debtors</u>") filed the *Plan Supplement to the Debtors*' *Amended Joint Prearranged Chapter 11 Plan Dated September 4, 2015* [Docket No. 489] (the "<u>Plan Supplement</u>") with the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court").

PLEASE TAKE FURTHER NOTICE THAT the Plan Supplement is being filed as a supplement to, in support of, and in accordance with the *Debtors' Amended Joint Prearranged Chapter 11 Plan Dated September 4, 2015* [Docket No. 470] (as may be further amended, supplemented, or modified from time to time, the "Plan"). Capitalized terms used but not defined herein have the meanings ascribed to them in the Plan.

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.

PLEASE TAKE FURTHER NOTICE THAT the following documents are included in the Plan Supplement, as each may be amended, modified, or supplemented as set forth below:

| Exhibit | Plan Supplement Document |
|---------|---|
| 1 | Exit ABL Facility Loan Agreement |
| 2 | Exit Intercreditor Agreement |
| 3 | Exit Term Facility Loan Agreement |
| 4 | GUC Trust Agreement |
| 5 | List of Contracts to be Assumed under Section 5.1 of the Plan |
| 6 | New Holdco Bylaws |
| 7 | New Holdco Certificate of Incorporation |
| 8 | New Holdco Shareholders Agreement |
| 9 | New Opco Certificate of Formation |
| 10 | New Opco LLC Agreement |
| 11 | Nonexclusive list of retained Causes of Actions |
| 12 | SBI Secured Note |
| 13 | SBI Nonrecourse Note |
| 14 | Section 1129(a)(5) Disclosure of Directors and Officers |
| 15 | Subordinated Notes Agreement |
| 16 | Subordinated Notes Intercreditor Agreement |
| 17 | Amended and Restated Certificate of Incorporation of BT Financing, Inc. |
| 18 | Amended and Restated By-Laws of BT Financing, Inc. |
| 19 | Amended and Restated Limited Liability Company Agreement of BTCSP, LLC |
| 20 | Amendment to Certificate of Formation of BTCSP, LLC |

PLEASE TAKE FURTHER NOTICE THAT certain documents, or portions thereof, contained in the Plan Supplement remain subject to continuing negotiations among the Debtors and interested parties with respect thereto. Subject to the express provision of the Plan, the Debtors hereby reserve all rights to amend, revise, or supplement the Plan Supplement, and any

of the documents and designations contained therein, at any time before the Effective Date of the Plan, or any such other date as may be permitted by the Plan or by order of the Bankruptcy Court.

PLEASE TAKE FURTHER NOTICE THAT copies of the Plan and the Plan Supplement also may be obtained by contacting Donlin, Recano & Company, Inc. ("DRC"), the administrative advisor retained by the Debtors in the chapter 11 cases, by: (a) accessing the Debtors' restructuring website at http://www.donlinrecano.com/bt; (b) writing to DRC at Donlin, Recano & Company, Inc., Re: Boomerang Tube, LLC, et al., P.O. Box 199001, Blythebourne Station, Brooklyn, NY 11219; or (c) calling DRC at (212) 771-1128. You may also obtain such materials for a fee via PACER at http://www.deb.uscourts.gov.

Dated: September 11, 2015 Wilmington, Delaware /s/ Ryan M. Bartley

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