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)

Joint Administration Requested

NOTICE OF HEARING TO CONSIDER FIRST DAY PLEADINGS

PLEASE TAKE NOTICE that on June 9, 2015, Boomerang Tube, LLC and its affiliated debtors and debtors in possession in the above-captioned cases (collectively, the "**Debtors**") filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the "**Bankruptcy Code**"), with the Clerk of the United States Bankruptcy Court for the District of Delaware (the "**Court**"). The Debtors continue to operate their businesses as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE that the Debtors will present the following pleadings (collectively, the "First Day Pleadings") at a hearing on <u>June 10, 2015 at 12:00 noon (ET)</u> (the "Hearing") before the Honorable Mary F. Walrath, United States Bankruptcy Judge, in the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 5th Floor, Courtroom No. 4, Wilmington, Delaware 19801:

1. Debtors' Motion for Entry of an Order Directing the Joint Administration of the Debtors' Chapter 11 Cases [D.I. 3, 6/9/15]

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. Debtors' Application for Entry of an Order, Pursuant to 28 U.S.C. § 156(c), (A) Approving the Retention and Appointment of Donlin, Recano & Company, Inc. as Claims and Noticing Agent for the Debtors, Effective Nunc Pro Tunc to the Petition Date and (B) Granting Related Relief [D.I. 4, 6/9/15]
- 3. Debtors' Motion for Entry of an Order (A) Authorizing the Debtors to (I) Continue Using Their Existing Cash Management System, Including Bank Accounts, and Honor Related Prepetition Fees and Expenses, and (II) Maintain Their Existing Business Forms, (B) Authorizing Continued Intercompany Transfers Related to Payroll Funding, and (C) Granting a Waiver of the Investment and Deposit Requirements of Section 345(b) of the Bankruptcy Code [D.I. 5, 6/9/15]
- 4. Debtors' Motion for Entry of an Order (A) Authorizing the Debtors to Honor and Pay Prepetition Customer Obligations and (B) Granting Relief From the Automatic Stay to Continue Certain Customer Programs, and (C) Authorizing Financial Institutions to Honor and Process Checks and Transfers Related to Such Obligations [D.I. 6, 6/9/15]
- 5. Debtors' Motion for Entry of an Order (A) Authorizing the Debtors to Pay and Honor Certain Prepetition Wages, Benefits and Other Compensation Obligations and (B) Authorizing Financial Institutions to Honor and Process Checks and Transfers Related to Such Obligations [D.I. 7, 6/9/15]
- 6. Debtors' Motion for Entry of Interim and Final Orders (A) Prohibiting Utilities From Altering, Refusing or Discontinuing Service, (B) Deeming Utilities Adequately Assured of Future Performance and (C) Establishing Procedures for Determining Adequate Assurance of Payment [D.I. 8, 6/9/15]
- 7. Debtors' Motion for Entry of Order (A) Authorizing Debtors to (I) Continue Insurance Programs, (II) Pay All Obligations In Respect Thereof, and (III) Continue to Honor Insurance Premium Financing Obligations, and (B) Authorizing and Directing Banks and Financial Institutions to Honor and Process Checks and Transfers Related to Such Obligations [D.I. 9, 6/9/15]
- 8. Debtors' Motion for Entry of an Order (A) Authorizing Payment of Certain Prepetition Taxes and Fees and (B) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers [D.I. 10, 6/9/15]
- 9. Debtors' Motion for Entry of an Order (A) Authorizing the Debtors to Pay Certain Prepetition Claims of Critical Vendors, Shippers and Warehousemen and (B) Authorizing Financial Institutions to Honor All Related Checks and Electronic Payment Requests [D.I. 11, 6/9/15]

10. Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing Postpetition Financing Under Two Credit Facilities, (B) Granting Liens and Providing Superpriority Administrative Expense Claims, (C) Authorizing the Use of Cash Collateral, (D) Granting Adequate Protection, (E) Modifying the Automatic Stay, (F) Scheduling a Final Hearing, and (G) Granting Related Relief [D.I. 12, 6/9/15]

PLEASE TAKE FURTHER NOTICE that copies of all of the First Day Pleadings will be mailed to you subsequent to the Hearing, and are currently available on the website of the Debtors' proposed claims and noticing agent, Donlin, Recano & Company, Inc., dedicated to these 11 cases, www.donlinrecano.com/bt, or on the Court's website. www.deb.uscourts.gov. If you would like to receive copies of any of the First Day Pleadings prior to the Hearing, please contact Michelle Smith, Paralegal, at (302) 576-2603 or msmith@ycst.com. All parties wishing to participate in the Hearing telephonically must make arrangements with Court Call by telephone at (888) 882-6878 or on the internet at www.courtcall.com.

Dated: June 9, 2015

Wilmington, Delaware

/s/ Ryan M . Bartley

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