

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

Hearing Date: August 11, 2015 at 2:00 p.m. (ET)

Objection Deadline: July 30, 2015 at 4:00 p.m. (ET)

NOTICE OF HEARING TO CONSIDER
THE ADEQUACY OF DISCLOSURE STATEMENT

PLEASE TAKE NOTICE THAT, on June 30, 2015, Boomerang Tube, LLC and its affiliated debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”) filed with the United States Bankruptcy Court for the District of Delaware the *Debtors’ Joint Prearranged Chapter 11 Plan*, dated June 30, 2015 (as it may be amended, modified, or supplemented from time to time, the “Plan”) and the *Disclosure Statement for Debtors’ Joint Prearranged Chapter 11 Plan*, dated June 30, 2015 (as it may be amended, modified, or supplemented from time to time, the “Disclosure Statement”).

PLEASE TAKE FURTHER NOTICE THAT the Debtors intend to present the Disclosure Statement, and any changes or modifications thereto, for approval at a hearing before the Honorable Mary F. Walrath on **August 11, 2015, at 2:00 p.m. (prevailing Eastern Time)** at the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”), 824 N. Market Street, 5th Floor, Courtroom No. 4, Wilmington, Delaware 19801 (the “Disclosure Statement Hearing”). The Disclosure Statement may be amended at any time prior to or at the Disclosure Statement Hearing, and the Disclosure Statement Hearing may be continued from time to time by the Bankruptcy Court or by the Debtors without further notice other than adjournments announced in open court, or pursuant to an appropriate filing with the Bankruptcy Court.

PLEASE TAKE FURTHER NOTICE THAT objections, if any, to the approval of the Disclosure Statement must: (i) be made in writing; (ii) conform to the Bankruptcy Rules and the Local Rules; (iii) state the name and address of the objector or entity proposing a modification to the Disclosure Statement and the amount of its claim or nature of its interest in the Debtors’ chapter 11 cases; (iv) state with particularity the legal and factual basis for the objection; and (v) be filed with the Clerk of the Court, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801 (contemporaneously with a proof of service), and be served so as to be actually received by each of the following parties, **on or before 4:00 p.m. (prevailing Eastern Time) on July 30, 2015** (the “Disclosure Statement Objection Deadline”): (i) the Debtors, 14567 North Outer Forty, Suite 500, Chesterfield, Missouri 63017, Attn: Kevin Nystrom; (ii) proposed bankruptcy counsel to the Debtors, Young Conaway Stargatt & Taylor LLP, Rodney Square, 1000 North King Street, Wilmington, Delaware 19801, Attn: Robert S. Brady, Esq. and Sean M. Beach, Esq.; (iii) proposed special counsel to the Debtors, Debevoise & Plimpton LLP, 919 Third Avenue, New York, New York 10022, Attn: My Chi To, Esq. and Nick S. Kaluk, III, Esq.; (iv) counsel to the Term Loan Agent and Term DIP Agent, King & Spalding LLP, 1185 Avenue of the Americas, New York, New York 10036-4003, Attn: Michael C. Rupe, Esq., and King & Spalding LLP, 1180 Peachtree Street, NE, Atlanta, Georgia 30309, Attn: Austin W. Jowers, Esq.; (v) counsel to the ABL Facility Agent and DIP ABL Agent, Goldberg Kohn Ltd., 55 E. Monroe, Suite 3300, Chicago, Illinois 60622, Attn: Jeremy Downs, Esq. and Prisca Kim, Esq.; (vi) the Office of the United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801, Attn: Benjamin Hackman, Esq.; and (vii) proposed co-counsel to the Official Committee of Unsecured Creditors, (a) Morris, Nichols, Arsht & Tunnell LLP, 1201 North Market Street, Suite 1600, Wilmington, Delaware 19801, Attn: Derek C. Abbott, Esq. and Curtis S. Miller, Esq. and (b) Brown Rudnick LLP, One Financial Center, Boston, Massachusetts 02111, Attn: Steven D. Pohl, Esq. and Sunni P. Beville, Esq., and 7 Times Square, New York, New York 10036, Attn: Bennett S. Silverberg, Esq.

PLEASE TAKE FURTHER NOTICE THAT only those objections made in writing and timely filed and received by the Disclosure Statement Objection Deadline will be considered by the Bankruptcy Court during the Disclosure Statement Hearing. If no objections to the Disclosure Statement are timely and properly filed and served in accordance with

¹ 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 procedures set forth herein, the Bankruptcy Court may enter an order approving the Disclosure Statement without further notice.

PLEASE TAKE FURTHER NOTICE THAT copies of the Disclosure Statement and the Plan may be obtained by parties in interest free of charge on Donlin, Recano & Company, Inc.'s (the "Claims and Voting Agent") website at <https://www.donlinrecano.com/Clients/bt/Index>; (ii) by telephoning the Claims and Voting Agent at (212) 771-1128; (iii) by making a request via first class mail to Donlin, Recano & Company, Inc., Re: Boomerang Tube, LLC, *et al.*, P.O. Box 199001, Blythebourne Station, Brooklyn, New York 11219, or (iv) by overnight mail to Donlin, Recano & Company, Inc., Re: Boomerang Tube, LLC, *et al.*, 6201 15th Avenue, Brooklyn, New York 11219. Copies of the Disclosure Statement and the Plan are also available for inspection during regular business hours at the office of the Clerk of the United States Bankruptcy Court for the District of Delaware, 3rd Floor, 824 N. Market Street, Wilmington, Delaware 19801. In addition, copies of the Disclosure Statement and the Plan may be obtained at the Court's website, <http://www.deb.uscourts.gov>, for a fee.

PLEASE TAKE FURTHER NOTICE THAT, in accordance with Federal Rule of Bankruptcy Procedure 3014, any class of secured creditors under the Plan that intends to make an election pursuant to 11 U.S.C. § 1111(b)(2) with respect to the secured claim(s) held by such class must do so prior to the conclusion of the Disclosure Statement Hearing.

Dated: July 1, 2015
Wilmington, Delaware

/s/ Ryan M. Bartley

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