

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. 7, 8, 11, 12, 43, 48, 51, 60
and 61

OMNIBUS NOTICE OF PLEADINGS AND HEARING THEREON

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**” and each individually, a “**Debtor**”), filed certain pleadings with this Court seeking “first day” relief (collectively, the “**First Day Pleadings**”).

PLEASE TAKE FURTHER NOTICE that a hearing on the First Day Pleadings was held on June 10, 2015, after which the Court entered orders granting the relief requested in the following First Day Pleadings on an interim basis (such motions, the “**Interim Relief Motions**”):

1. *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]*
2. *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]*
3. *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]*

PLEASE TAKE FURTHER NOTICE that the Court entered an order [D.I. 43] approving certain of the relief set forth in the *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] on a final basis, but deferred consideration of approval of the relief requested with respect to the Gain Share Program, the Annual Bonus Program, and Stipends for country club dues until a later hearing (the “**Continued Employee Matters**”)

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.

PLEASE TAKE FURTHER NOTICE that a hearing to consider final approval of the Interim Relief Motions and the Continued Employee Matters is scheduled for **July 10, 2015 at 12:00 noon (ET)** at the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 5th Floor, Courtroom No. 4, Wilmington, Delaware 19801 before The Honorable Mary F. Walrath, United States Bankruptcy Judge for the District of Delaware.

PLEASE TAKE FURTHER NOTICE that any objections to the entry of orders approving the Interim Relief Motions and the Continued Employee Matters on a final basis must be filed on or before **July 2, 2015 at 4:00 p.m. (ET)** (the “**Objection Deadline**”) with the United States Bankruptcy Court for the District of Delaware, 3rd Floor, 824 Market Street, Wilmington, Delaware 19801. At the same time, you must serve a copy of the response(s) so as to be received on or before the Objection Deadline upon the following parties: (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) counsel to any statutory committee appointed in these chapter 11 cases.

IF NO OBJECTIONS TO FINAL APPROVAL OF THE INTERIM RELIEF MOTIONS AND THE CONTINUED EMPLOYEE MATTERS ARE TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN CONNECTION WITH SUCH FIRST DAY PLEADINGS ON A FINAL BASIS WITHOUT FURTHER NOTICE OR HEARING.

Dated: June 11, 2015
Wilmington, Delaware

/s/ Ryan M. Bartley

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Proposed Counsel for the Debtors and Debtors in Possession