

**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

NOTICE TO HOLDERS OF DISPUTED CLAIMS

PLEASE TAKE NOTICE THAT on December 29, 2015, the United States Bankruptcy Court for the District of Delaware (the “**Court**”) entered the *Order (A) Approving the Disclosure Statement on a Preliminary Basis, (B) Scheduling Combined Hearing on Approval of Disclosure Statement and Confirmation of Plan, (C) Establishing Procedures for Solicitation and Tabulation of Votes on Plan, and (D) Approving Related Matters* (the “**Combined Hearing Order**”) that, among other things, authorized the Debtors to use the *Amended Disclosure Statement for Debtors’ Second Amended Joint Chapter 11 Plan*, dated as of December 29, 2015 (as may be amended, supplemented, or otherwise modified from time to time and including all exhibits and supplements thereto, the “**Disclosure Statement**”), filed in support of the *Debtors’ Second Amended Joint Chapter 11 Plan*, dated December 29, 2015 (as may be amended, supplemented, or otherwise modified from time to time and including all exhibits thereto, the “**Plan**”), in connection with the solicitation of votes on the Plan, subject to objections, further review, and approval.²

PLEASE TAKE FURTHER NOTICE THAT the Disclosure Statement, the Combined Hearing Order, the Plan, and the other documents and materials included in the Solicitation Package, except Ballots, may be obtained from Donlin, Recano & Company, Inc. (the “**Solicitation Agent**”) at no charge by (i) accessing the Debtors’ restructuring website at <http://www.donlinrecano.com/bt>, (ii) emailing DRCVote@donlinrecano.com, (iii) writing to the Solicitation Agent at Donlin, Recano & Company, Inc., Attention: Voting Department, P.O. Box 2034, Murray Hill Station, New York, NY 10156-0701, or (iv) calling the Solicitation Agent at (212) 771-1128. You may also obtain copies of any pleadings filed in the chapter 11 cases at no charge via the Debtors’ restructuring website at <http://www.donlinrecano.com/bt> or for a fee via PACER at: <http://www.deb.uscourts.gov>.

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.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Plan, the Disclosure Statement, or the Combined Hearing Order, as applicable.

PLEASE TAKE FURTHER NOTICE THAT you are receiving this notice because you are the Holder of a Disputed Claim. **You are not entitled to vote the disputed portion of your Claim on the Plan unless one or more of the following (each a “Resolution Event”) has occurred in the timeframe provided by the Solicitation Procedures:**

1. an order of the Court is entered allowing such Claim pursuant to section 502(b) of the Bankruptcy Code, after notice and a hearing;
1. an order of the Court is entered temporarily allowing such Claim for voting purposes only pursuant to Bankruptcy Rule 3018(a), after notice and a hearing;
2. a stipulation or other agreement is executed between the Holder of such Claim and the Debtors resolving the objection and allowing such Claim in an agreed upon amount; or
3. a stipulation or other agreement is executed between the Holder of such Claim and the Debtors temporarily allowing the Holder of such Claim to vote its Claim in an agreed upon amount; or

Accordingly, this notice and the *Notice of Order (A) Scheduling Combined Hearing on Approval of Disclosure Statement and Confirmation of Plan, (B) Establishing Procedures for Solicitation and Tabulation of Votes on Plan, and (C) Approving Related Matters* are being sent to you for informational purposes only.

PLEASE TAKE FURTHER NOTICE THAT any motion under Bankruptcy Rule 3018 for temporary allowance of a claim for voting purposes must be filed no later than **January 14, 2016 at 4:00 p.m. (prevailing Eastern Time)**. Any motion under Bankruptcy Rule 3018 must: (a) have a response deadline that is a minimum of ten (10) days after the filing of such motion; and (b) be filed, contemporaneously with a proof of service, with the Court and served so that it is actually received by each of the following notice parties by **January 14, 2016 at 4:00 p.m. (prevailing Eastern Time)**:

<i>Counsel to the Debtors</i>	
YOUNG CONAWAY STARGATT & TAYLOR, LLP Robert S. Brady (No. 2847) Sean M. Beach (No. 4070) Ryan M. Bartley (No. 4985) Rodney Square 1000 North King Street Wilmington, Delaware 19801	DEBEVOISE & PLIMPTON LLP My Chi To Nick S. Kaluk III Patricia Teixeira Alexander Bondarenko 919 Third Avenue, New York, NY 10022

<i>Counsel to the Committee</i>	
BROWN RUDNICK LLP Steven D. Pohl Sunni P. Beville One Financial Center Boston, MA 02111	MORRIS NICHOLS ARSHT & TUNNELL LLP Derek C. Abbott (No. 3376) Curtis S. Miller (No. 4583) Matthew R. Koch (No. 6048) 1201 North Market Street, Suite 1600 Wilmington, DE 19801
<i>Counsel to Wells Fargo Capital Finance, LLC</i>	
GOLDBERG KOHN LTD. Jeremy M. Downs Prisca M. Kim 55 East Monroe, Suite 3300 Chicago, IL 60603	WOMBLE CARLYLE SANDRIDGE & RICE, LLP Francis A. Monaco, Jr. Thomas M. Horan 222 Delaware Avenue, Suite 1501 Wilmington, DE 19801
<i>Counsel to Cortland Capital Market Services</i>	
KING & SPALDING LLP Michael C. Rupe Christopher G. Boies 1185 Avenue of the Americas New York, New York 10036-4003 KING & SPALDING LLP W. Austin Jowers 1180 Peachtree Street, NE Atlanta, Georgia 30309	CHIPMAN BROWN CICERO & COLE, LLP William E. Chipman, Jr. 1007 North Orange Street, Suite 1110 Wilmington, Delaware 19801
<i>U.S. Trustee</i>	
Office of the United States Trustee The District of Delaware 844 King Street, Suite 2207 Wilmington, Delaware 19801 Attn: Benjamin A. Hackman	

PLEASE TAKE FURTHER NOTICE THAT if a Resolution Event occurs, as provided by the Solicitation Procedures, then no later than two (2) Business Days thereafter, the Solicitation Agent shall distribute a Ballot, and a pre-addressed, postage pre-paid envelope to you, which must be returned to the Solicitation Agent no later than the Voting Deadline, which is **5:00 p.m. (prevailing Eastern Time) on January 21, 2016.**

PLEASE TAKE FURTHER NOTICE THAT if you have any questions about the status of any of your Claims or Interests, you should contact the Solicitation Agent in accordance with the instructions provided above. Please note that the Solicitation Agent cannot give you legal advice or advise you on how the Plan affects you or what actions you should take with respect to the Plan. Any questions regarding those matters should be referred to your own counsel.

Dated: December 31, 2015
Wilmington, Delaware

/s/ Ryan M. Bartley

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Robert S. Brady (No. 2847)

Sean M. Beach (No. 4070)

Ryan M. Bartley (No. 4985)

Rodney Square

1000 North King Street

Wilmington, Delaware 19801

Tel: (302) 571-6600

Fax: (302) 571-1253

Email: rbrady@ycst.com

sbeach@ycst.com

rbartley@ycst.com

Counsel for the Debtors and Debtors in Possession