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Proposed Attorneys for Debtors
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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: In re : Chapter 11
: :
: M. FABRIKANT & SONS, INC. and : Case No. 06-12737-(SMB)
: FABRIKANT – LEER INTERNATIONAL, LTD. : Case No. 06-12739-(SMB)
: Debtors. :
: (Jointly Administered)
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NOTICE OF SCHEDULED HEARING OF FIRST DAY MOTIONS

PLEASE TAKE NOTICE THAT, on November 17, 2006 (the “Petition Date”), M. Fabrikant & Sons, Inc. (“MFS”) and Fabrikant-Leer International, Ltd. (“FLI”), as debtors and debtors-in-possession herein (collectively, the “Debtors”), filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of New York (the “Court”).

PLEASE TAKE FURTHER NOTICE THAT, a hearing will be held on, Tuesday, November 21, 2006, at 10:00 a.m. (Eastern Standard Time), or as soon thereafter as counsel can be heard (the “First Day Hearing”), before the Honorable Stuart M. Bernstein, United States Bankruptcy Chief Judge for the Southern District of New York, Room 723, 7th Floor, One

Bowling Green, New York, New York, 10004, to consider the motions filed by the Debtors set forth on the attached **Exhibit "A"** (collectively, the "First Day Motions").

PLEASE TAKE FURTHER NOTICE THAT, copies of each of the First Day Motions, and any document related thereto, can be viewed on the Court's website at <http://www.ecf.nysb.uscourts.gov> or at the website of the Debtors' claims and noticing Agent at <http://www.donlinrecano.com>.

Dated: November 20, 2006
New York, New York

/s/ Mitchel H. Perkiel
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PROPOSED ATTORNEYS FOR
DEBTORS AND DEBTORS IN
POSSESSION

EXHIBIT A

FIRST DAY MOTIONS TO BE HEARD AT FIRST DAY HEARING

Administrative Motions

1. Motion of Debtors and Debtors in Possession, Pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure, for an Order Directing the Joint Administration of Their Chapter 11 Cases
2. Motion of Debtors and Debtors in Possession for Order Pursuant to Section 521 of the Bankruptcy Code and Federal Rule Of Bankruptcy Procedure Authorizing Debtors to (I) Prepare Consolidated Lists of Creditors and Equity Security Holders in Lieu of Mailing Matrix and (II) Mail Initial Notices
3. Motion of Debtors and Debtors in Possession, Pursuant to Bankruptcy Rule 1007, for Order Extending the Time Within Which They Must File Their (a) Schedules of Assets and Liabilities, (b) Schedules of Executory Contracts and Unexpired Leases and (c) Statements of Financial Affairs
4. Motion of Debtors and Debtors in Possession, Pursuant to Sections 105(a), 327, 328 and 330 of the Bankruptcy Code and Bankruptcy Rule 2014(a), for an Order Authorizing Them to Retain, Employ and Pay Certain Professionals in the Ordinary Course of Their Businesses
5. Application of Debtors and Debtors in Possession, Pursuant to Section 327(a) of the Bankruptcy Code, Rule 2014(a) of the Bankruptcy Rules and Local Bankruptcy Rule 2014-1, for Order Authorizing Employment and Retention of Peter J. Solomon Company as Investment Bankers
6. Debtors' Application to Retain and to Employ Donlin, Recano & Company, Inc., Pursuant to 28 U.S.C. § 156 (c) as Claims, Notice, and Balloting Agent
7. Motion of Debtors and Debtors in Possession, Pursuant to Sections 105(a) and 331 of the Bankruptcy Code, Bankruptcy Rule 2016(a) and Local Bankruptcy Rule 2016-1, for Interim Monthly Compensation of Professionals
8. Motion for Order Pursuant to Sections 363 and 105 of the Bankruptcy Code Approving the Continued Employment of Getzler Henrich & Associates LLC as Crisis Manager to Debtors and Debtors in Possession
9. Application of Debtors and Debtors in Possession, Pursuant to Sections 327(a) and 329(a) of the Bankruptcy Code, Bankruptcy Rules 2014(a) and 2016(b) and Local Bankruptcy Rule 2014-1, for Interim and Final Orders Authorizing Them to Retain and Employ Troutman Sanders LLP as Counsel, Nunc Pro Tunc, as of the Petition Date

Operational Motions

1. Motion of Debtors for Order Pursuant to 11 U.S.C. § § 105, 363 and 553 (I) Authorizing Continued Maintenance of Existing Bank Accounts, (II) Authorizing Continued Use of Existing Cash Management Systems, (III) Authorizing Preservation and Exercise of Intercompany Setoff Rights, (IV) Granting Administrative Status for Post-Petition Intercompany Transactions, and (V) Authorizing Continued Use of Existing Business Forms
2. Motion of Debtors and Debtors-in-Possession, Pursuant to Sections 105(a), 363, 507(a)(4), 507(a)(5) and 541(d) of the Bankruptcy Code, for an Order Authorizing Them (I) to Pay: (A) Pre-petition Employee Wages, Salaries and Related Items; (B) Pre-petition Employee Business Expenses; (C) Pre-petition Contributions to, and Benefits Under, Employee Benefit Plans; (D) Pre-petition Employee Payroll Deductions and Withholdings; (E) Pre-Petition Temporary Workforce Costs; and (F) All Costs and Expenses Incident to the Foregoing Payments and Contributions; and (II) to institute a Modified Severance Plan
3. Motion of Debtors for Interim and Final Orders Pursuant to 11 U.S.C. §§ 105(a) and 366 Determining Adequate Assurance of Payment for Future Utility Services
4. Motion of Debtors and Debtors in Possession, Pursuant to Sections 105(a), 363(b), 507(a) and 541 of the Bankruptcy Code, Authorizing Them to Pay Certain Pre-petition Taxes
5. Motion of Debtors and Debtors in Possession, for an Order Confirming the Administrative Expense Priority Status of the Debtors' Undisputed Obligations to Suppliers for the Postpetition Delivery of Goods and Provision of Services
6. Motion of Debtors and Debtors in Possession, Pursuant to Section 105 of the Bankruptcy Code, for an Order Enforcing the Protections of Sections 362 and 525 of the Bankruptcy Code
7. Motion of Debtors and Debtors in Possession, Pursuant to Sections 105(a) and 363(c) of the Bankruptcy Code, for an Order Authorizing Them to Honor or Pay Pre-petition Obligations to Their Customers and for Related Relief
8. Motion of Debtors and Debtors in Possession, Pursuant to Sections §§ 363(c)(2) and 1007 of the Bankruptcy Code and Local Rule 4001-3 Authorizing the Use of Cash Collateral