## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

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In re:	:	Chapter 11
	:	
PLASTECH ENGINEERED PRODUCTS,	:	Case No. 08-42417 (PJS)
INC., <u>et</u> <u>al</u> .,	:	
	:	
Debtors.	:	Jointly Administered
	X	

# TO: ALL POTENTIAL HOLDERS OF ADMINISTRATIVE CLAIMS UNDER BANKRUPTCY CODE SECTION 503(b)(9)

PLEASE TAKE NOTICE THAT MAY 30, 2008 HAS BEEN ESTABLISHED AS THE DEADLINE FOR FILING A REQUEST FOR ALLOWANCE OF AN ADMINISTRATIVE EXPENSE CLAIM UNDER 11 U.S.C. § 503(b)(9) IN THE ABOVE-CAPTIONED CASES. All parties asserting administrative expense claims, as defined in sections 101(5) and 503(b)(9) of 11 U.S.C. §§ 101-1532 (the "Bankruptcy Code"), for the value of any goods sold in the ordinary course of business and received by the Debtors (as defined below) within 20 days before February 1, 2008 (the "Petition Date") must file a request for payment on such claim (a "Section 503(b)(9) Claim Request") on or before May 30, 2008 (the "Bar Date").

#### PERSONS OR ENTITIES WHO MUST FILE AN ADMINISTRATIVE CLAIM REQUEST

On April 18, 2008, the United States Bankruptcy Court for the Eastern District of Michigan (the "Court") approved an order (the "Section 503(b)(9) Bar Date Order") establishing the Bar Date. Bankruptcy Code section 503(a) and the Section 503(b)(9) Bar Date Order require all persons and entities, including, without limitation, individuals, partnerships, corporations, estates, trusts, indenture trustees, unions and governmental units that assert a Claim (as defined in section 101(5) of the Bankruptcy Code) under Bankruptcy Code section 503(b)(9) against any of the Debtors listed on Exhibit 1 attached hereto, to file a Section 503(b)(9) Claim Request. Any person or entity holding a Section 503(b)(9) Claim must file a Section 503(b)(9) Claim Request on or before the Bar Date. Bankruptcy Code section 101(5) defines "Claim" to mean:

- (A) right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured; or
- (B) right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured[.]

11 U.S.C. § 101(5).

### CONTENTS OF SECTION 503(b)(9) CLAIM REQUESTS

Each Section 503(b)(9) Claim Request must set forth with specificity:

- 1. The amount of the claim.
- 2. The particular Debtor against which the claim is asserted.
- 3. The value of the goods the claimants assert the Debtor received within the 20 days before the Petition Date.

In addition, the Section 503(b)(9) Claim Request must include or attach documentation identifying: (i) the particular invoice(s) for which any such Section 503(b)(9) Claim is being asserted; and (ii) any demand to reclaim goods sold to the Debtors under Bankruptcy Code section 546(c).

Finally, any person asserting a Section 503(b)(9) Claim must certify that the goods were sold in the ordinary course of the Debtors' business.

#### TIME AND PLACE FOR FILING SECTION 503(b)(9) CLAIM REQUESTS

To obtain a copy of the Section 503(b)(9) Claim Request form, contact Donlin, Recano & Company, Inc., 419 Park Avenue South, New York, NY 10016 at (212) 771-1128 or visit www.donlinrecano.com.

For any Section 503(b)(9) Claim Request to be timely and properly filed, a person or entity holding a Section 503(b)(9) Claim must submit a signed original Section 503(b)(9) Claim Request asserting such Section 503(b)(9) Claim, together with accompanying documentation, by mail, hand-delivery, or overnight courier, to Plastech Engineered Products, Inc., et al., Claims Processing, in writing, c/o Donlin, Recano & Company, Inc. ("Donlin"), at the following address:

By Mail –

Donlin, Recano & Company, Inc., as Agent for the United States Bankruptcy Court Re: Plastech Engineered Products, Inc., et al., Claims Processing P.O. Box 899, Madison Square Station New York, NY 10010

By Hand-Delivery or Overnight Courier –

Donlin, Recano & Company, Inc. as Agent for the United States Bankruptcy Court Re: Plastech Engineered Products, Inc., et al., Claims Processing 419 Park Avenue South, Suite 1206 New York, NY 10016

Each Section 503(b)(9) Claim Request must be <u>delivered to and received by</u> Donlin no later than **4:00 p.m., Eastern Time, on May 30, 2008**, with a copy to Skadden, Arps, Slate, Meagher & Flom LLP, One Rodney Square, P.O. Box 636, Wilmington, Delaware 19899-0636 (Attn: Kristhy Peguero, Esq.). Any Section 503(b)(9) Claim Request may be submitted in person or by courier service, hand delivery, or mail addressed to Donlin at the foregoing address. Any Section 503(b)(9) Claim Request submitted by facsimile will not be accepted and will not be deemed filed until such Section 503(b)(9) Claim Request is

submitted by one of the methods described in the foregoing sentence. Any Section 503(b)(9) Claim Request will be deemed filed only when <u>actually received</u> by Donlin. If you wish to receive acknowledgment of Donlin's receipt of your Section 503(b)(9) Claim Request, you must also submit a copy of your original Section 503(b)(9) Claim Request and a self-addressed, stamped envelope. If you wish to assert Section 503(b)(9) Claims against more than one Debtor, you must file a separate Section 503(b)(9) Claim Request in the case of each Debtor against which you believe you hold such a claim.

## CONSEQUENCES OF FAILURE TO FILE SECTION 503(b)(9) CLAIM REQUEST

ANY PERSON OR ENTITY HOLDING A SECTION 503(b)(9) CLAIM THAT FAILS TO FILE A SECTION 503(b)(9) CLAIM REQUEST ON OR BEFORE THE BAR DATE SHALL BE FOREVER BARRED AND ESTOPPED FROM ASSERTING A SECTION 503(b)(9) CLAIM AGAINST THE DEBTORS, THEIR ESTATES, OR THE PROPERTY OF ANY OF THEM, ABSENT FURTHER ORDER OF THE COURT.

#### ADDITIONAL INFORMATION

If you require additional information regarding the filing of a Section 503(b)(9) Claim Request, you may contact the Debtors in writing at the addresses listed below. The claims registers for the Debtors will be available at the office of Donlin. Donlin may be contacted at www.donlinrecano.com or (212) 771-1128 between 9:00 a.m. and 5:00 p.m., Eastern Time, if there are questions concerning the filing or processing of a Section 503(b)(9) Claim Request.

Dated: Detroit, Michigan April 21, 2008

/s/ Mark L. Desgrosseilliers

Gregg M. Galardi Mark L. Desgrosseilliers Kristhy M. Peguero Skadden, Arps, Slate, Meagher & Flom LLP One Rodney Square P.O. Box 636 Wilmington, Delaware 19899-0636 (302) 651-3000 kristhy.peguero@skadden.com

- and –

Deborah L. Fish (P36580) Ralph R. McKee (P39484) Allard & Fish, P.C. 535 Griswold, Suite 2600 Detroit, Michigan 46226 (313) 961-6141 dfish@allardfishpc.com rmckee@allardfishpc.com

Counsel for Debtors and Debtors in Possession

## **EXHIBIT 1**

## **Debtors and Debtors in Possession**

Plastech Engineered Products, Inc. LDM Technologies, Inc. Plastech Frenchtown, Inc.

Plastech Decorating Systems, Inc.

Plastech Exterior Systems, Inc.

Plastech Romulus, Inc.

MBS Polymet, Inc.

LDM Holding Canada, Inc. LDM Holding Mexico, Inc.