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January 22, 2021

To: General Unsecured Creditors of Comcar Industries, Inc. and affiliated debtors

Re: Recommendation of the Creditors' Committee to Vote to Accept
Debtors' Amended Chapter 11 Plan of Liquidation

Dear Sir/Madam:

We are counsel to the Official Committee of Unsecured Creditors (the "Creditors' Committee") of Comcar Industries, Inc. and its affiliated debtors (collectively, "Comcar" or the "Debtors") in their chapter 11 cases pending before Bankruptcy Judge Laurie Selber Silverstein in the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court"). On May 28, 2020, the Creditors' Committee was appointed by the Office of the United States Trustee for Region 3. The Creditors' Committee represents the interests of all unsecured creditors of the Debtors.

Copies of the *Debtors' Amended Combined Disclosure Statement and Chapter 11 Plan of Liquidation* (the "Amended Plan and Disclosure Statement")¹ are being distributed to you, along with a ballot with which to cast your vote. **The Creditors' Committee supports the Amended Plan and urges you to vote to accept the Amended Plan by so indicating on the enclosed ballot.**

The Disclosure Statement contains extensive information with respect to the Amended Plan. **The Creditors' Committee urges you to read the Amended Plan and Disclosure Statement carefully before you cast your vote(s) to accept or reject the Amended Plan and to consult with an attorney to the extent you deem that necessary.**

¹ Capitalized terms used but not defined herein shall have the respective meanings ascribed to them in the Amended Plan and Disclosure Statement. In the event of any conflict between this letter and the Amended Plan and Disclosure Statement, the terms of the Amended Plan and Disclosure Statement shall control.



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As set forth in the Disclosure Statement and the Liquidation Analysis attached thereto, the Debtors estimate that under the Amended Plan, holders of allowed general unsecured claims in Class 4 (“General Unsecured Claims”) and holders of Allowed CWI and Bostick Claims in Class 5 would receive a distribution totaling approximately **4%** of the allowed amount of such claims following confirmation and the Effective Date of the Amended Plan. The distributions to holders of allowed Class 4 General Unsecured Claims and Allowed Class 5 CWI and Bostick Claims could be greater depending on the reconciliation of claims asserted against the Debtors and potential recoveries from litigation claims that are preserved for the Liquidating Trust to pursue under the Amended Plan.

The Amended Plan represents a Global Settlement between the Creditors’ Committee, the Debtors and the Debtors’ senior secured creditors, B2 FIE VII LLC and B2 FIE VIII LLC. Without the Global Settlement and the Amended Plan, there would likely be no recoveries for unsecured creditors. Accordingly, the Creditors’ Committee believes that the Amended Plan provides a treatment of your claim that is fair and equitable and recommends that you vote to **accept** the Amended Plan in accordance with the instructions set forth on the enclosed ballot.

The voting deadline with respect to the Amended Plan is February 28, 2021. Please complete and submit your ballot in accordance with the enclosed instructions so that they are received no later than the voting deadline. Please contact the undersigned with any questions regarding this matter via email at ggouveia@foxrothschild.com or (312) 980-3816.

Very truly yours,

Gordon E. Gouveia

GEG: