

**THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

KLAUSNER LUMBER TWO LLC,

Debtor.¹

Chapter 11

Case No. 20-11518 (KBO)

Objections Due: January 11, 2022 at 4:00 p.m. (ET)

Hearing Date: January 18, 2022 at 11:00 a.m. (ET)

NOTICE OF DISCLOSURE STATEMENT HEARING

PLEASE TAKE NOTICE that, on December 10, 2021, Klausner Lumber Two LLC, debtor and debtor in possession (the “**Debtor**”) and the Official Committee of Unsecured Creditors (the “**Committee**”, and together with the Debtor, the “**Proponents**”) filed (i) the *Chapter 11 Plan for Klausner Lumber Two LLC Jointly Proposed by the Debtor and the Official Committee of Unsecured Creditors* [D.I. 1118] (as may be modified, amended, or supplemented from time to time, the “**Plan**”) and (ii) the *Disclosure Statement Pursuant to Section 1125 of the Bankruptcy Code with Respect to Chapter 11 Plan for Klausner Lumber Two LLC Jointly Proposed by the Debtor and the Official Committee of Unsecured Creditors* [D.I. 1119] (as may be modified, amended, or supplemented from time to time, the “**Disclosure Statement**”).²

PLEASE TAKE FURTHER NOTICE that the Debtor remains focused on reaching consensus on a plan of reorganization among its creditors and will modify the Plan and Disclosure Statement as necessary during this process.

PLEASE TAKE FURTHER NOTICE that, on December 10, 2021, the Proponents filed the *Motion of Debtor for Entry of an Order (I) Approving the Disclosure Statement, (II) Establishing Procedures for the Solicitation and Tabulation of Votes to Accept or Reject the Plan Jointly Proposed by the Debtor and the Official Committee of Unsecured Creditors, (III) Approving the Form of Ballot and Solicitation Materials, (IV) Establishing the Voting Record Date, (V) Fixing the Date, Time, and Place for the Confirmation Hearing and the Deadline for Filing Objections Thereto, and (VI) Approving Related Notice Procedures* [D.I. 1120] (the “**Motion**”) seeking entry of an order, among other things, (a) scheduling dates and deadlines in connection with the approval of the Disclosure Statement and the confirmation of the Plan and (b) establishing certain protocols in connection with those proceedings.

PLEASE TAKE FURTHER NOTICE that if you would like to obtain a copy of the Disclosure Statement, the Plan, the Motion or related documents, you may obtain a copy from (a)

¹ The last four digits of the Debtor’s federal EIN are 4897. The Debtor’s mailing address is Klausner Lumber Two LLC, P.O. Box C, Redding Ridge, CT 06876.

² Capitalized terms used but not otherwise defined herein shall have the meanings set forth in the Plan or Disclosure Statement, as applicable. The Proponents reserve the right to amend, supplement, or modify the Plan or the Disclosure Statement.

Donlin, Recano & Company, Inc. at no charge by accessing the Debtor's restructuring website at <https://www.donlinrecano.com/Clients/k2/Index>, by writing to 6201 15th Avenue, Brooklyn, New York 11219, or by telephone at (800) 903-3727 (toll-free) or (212) 481-1411 (if calling from outside the U.S. or Canada) or (b) for a fee via PACER at <http://www.deb.uscourts.gov>.

PLEASE TAKE FURTHER NOTICE that a hearing on the Disclosure Statement (the “**Disclosure Statement Hearing**”) will be held before the Honorable KAREN B. OWENS, United States Bankruptcy Judge, on **January 18, 2022 at 11:00 a.m. (prevailing Eastern Time)**, in the Bankruptcy Court, 824 N. Market Street, 6th Floor, Courtroom 4, Wilmington, Delaware 19801 (the “**Court**”).

PLEASE TAKE FURTHER NOTICE that objections to the Disclosure Statement is **January 11, 2022 at 4:00 p.m. (prevailing Eastern Time)** (the “**Objection Deadline**”). Any objections to the relief sought at the Disclosure Statement Hearing must: (a) be in writing and (b) be filed with the Court and served on Objections to confirmation of the Plan on any ground, including adequacy of the disclosures therein, if any, must (a) be in writing and (b) be filed with the Court and served on (i) counsel to the Debtor, (A) Morris, Nichols, Arsht & Tunnell LLP, 1201 North Market Street, P.O. Box 1347, Wilmington, DE 19899 (Attention: Eric D. Schwartz, Esq., Daniel Butz, Esq. and Michelle M. Fu, Esq.), and (B) Westerman Ball Ederer Miller Zucker & Sharfstein, LLP, 1201 RXR Plaza, Uniondale, New York 11556 (Attn: Thomas A. Draghi, Esq. and William C. Heuer, Esq.), (ii) counsel to the Committee, Armstrong Teasdale LLP, 300 Delaware Avenue, Suite 210, Wilmington, Delaware 19801 (Attn: Eric M. Suttty, Esq., and Jonathan M. Stemerman, Esq.) and (iii) the Office of the U.S. Trustee for the District of Delaware, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801 (Attn.: Rosa Sierra, Esq.), so as to be actually received on or before the Objection Deadline.

Dated: December 10, 2021
Wilmington, Delaware

Respectfully submitted,
MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Michelle M. Fu

Robert J. Dehney (No. 3578)
Eric D. Schwartz (No. 3134)
Daniel B. Butz (No. 4227)
Michelle M. Fu (No. 6661)
1201 North Market Street, 16th Floor
P.O. Box 1347
Wilmington, Delaware 19899-1347
Telephone: (302) 658-9200
Facsimile: (302) 658-3989
Email: dbutz@morrisnichols.com
mfu@morrisnichols.com

-and-

**WESTERMAN BALL EDERER
MILLER ZUCKER & SHARFSTEIN, LLP**

Thomas A. Draghi (admitted *pro hac vice*)
Alison M. Ladd (admitted *pro hac vice*)
1201 RXR Plaza
Uniondale, NY 11556
Tel: 516-622-9200
tdraghi@westermanllp.com
wheuer@westermanllp.com

Counsel to the Debtor and Debtor in Possession