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Hearing Date: February 21, 2008, 10:00 a.m.  
Objection Deadline: February 18, 2008

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

In re:	)	Chapter 11
	)	
QUEBECOR WORLD (USA) INC., et al.	)	Case No. 08-10152 (JMP)
	)	
Debtors.	)	(Jointly Administered)
	)	

**NOTICE OF MOTION OF BLUE HERON PAPER COMPANY (i) TO ALLOW  
RECOUPMENT AND/OR (ii) FOR RELIEF FROM THE AUTOMATIC STAY TO  
ALLOW SETOFF**

PLEASE TAKE NOTICE that upon the annexed motion (the “Motion”) of Blue Heron Paper Company (“Blue Heron”), the undersigned will move before the Honorable James M. Peck, United States Bankruptcy Judge, at the United States Bankruptcy Court, Alexander Hamilton United States Custom House, One Bowling Green, New York, New York, 10004-1408, Room 601, on February 21, 2008, at 10:00 a.m., or as soon thereafter as counsel can be heard, pursuant to sections 105 and 362(d) of the United States Bankruptcy Code and Federal Rule of Bankruptcy Procedure 4001(a), for entry of an order (i) allowing Blue Heron to recoup certain amounts owed to it by Quebecor World (USA) Inc. (“Quebecor”) and/or (ii) modifying the automatic stay to allow Blue Heron to effect a setoff of such amounts.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief sought in the Motion must be in writing, state with particularity the grounds therefore, and conform to the Federal Rules of Bankruptcy Procedure, the Local Rules of the United States Bankruptcy Court

for the Southern District of New York (the “Bankruptcy Court”), and the Bankruptcy Court’s Interim Order dated January 23, 2008 establishing case management and notice procedures in these cases, and must be filed with the Bankruptcy Court electronically by registered users of the Bankruptcy Court’s case filing system (the User’s Manual for the Electronic Case Filing System can be found at <http://www.nysb.uscourts.gov>, the official website for the Bankruptcy Court) and, by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect or any other Windows-based word processing format (in either case, with a hard copy delivered directly to Chambers) and shall be served upon the attorneys for Blue Heron, Stoel Rives LLP, at 600 University Street, Suite 3600, Seattle, WA 98101 (Attention: Erin L. Eliassen and Brandy A. Sargent), so as to be received by the deadline set forth above.

PLEASE TAKE FURTHER NOTICE that the Hearing may be adjourned thereafter from time to time without further notice.

PLEASE TAKE FURTHER NOTICE that if no objections are filed and served as prescribed herein, the relief requested by Blue Heron may be granted without further hearing or notice.

DATED: February 7, 2008.

STOEL RIVES LLP

          /s/ Erin L. Eliassen          .  
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