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Attorneys for National City Commercial Capital Company, LLC

/s/ Frank Peretore  
Frank Peretore, Esq.  
FP#7020

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:

QUEBECOR WORLD (USA) INC.

Debtor.

: Case No. 08-10152 (jmp)  
: Chapter  
:  
: Hearing Date: 08/14/08  
:  
: NOTICE OF MOTION TO  
: COMPEL THE DEBTOR IN  
: POSSESSION/TRUSTEE TO  
: ACCEPT OR REJECT  
: EQUIPMENT LEASE AND/OR  
: FOR RELIEF FROM THE  
: AUTOMATIC STAY AND FOR  
: AN ADMINISTRATIVE CLAIM

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TO: Quebecor World (USA) Inc.  
150 42<sup>nd</sup> Street  
New York, New York 10034

Anthony D. Boccanfuso, Esq.  
Michael J. Canning  
Attorneys for the Debtor  
Arnold & Porter  
399 Park Avenue  
New York, New York 10022

Joon P. Hong, Esq.  
Attorney for the Debtor  
Richards Kibbe & Orbe, LLP  
One World Financial Center  
New York, New York 10281

Larren M. Nashelsky, Esq.  
Attorney for the Debtor  
Morrison & Foerster, LLP  
1290 Avenue of the Americas  
New York, New York 10104

Andrew D. Velez-Rivera, Esq.  
Office of the U.S. Trustee  
33 Whitehall Street  
21<sup>st</sup> Floor  
New York, New York 10004

Attached list of 20 largest unsecured creditors.

SIRS:

PLEASE TAKE NOTICE that on August 14, 2008, at 10:00 a.m. or as soon thereafter as counsel may be heard, the undersigned, attorney for National City Commercial Capital Company, LLC (“National City”) will move before the Honorable James M. Peck, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, Court Room 601 New York City, New York 10004 for an Order compelling the Trustee and/or the attorney for the Debtor in Possession to accept or reject two Master Lease Agreements within a certain period of time, and that during said period of time, the Debtor be required to pay National City the sum of \$20,273.00 per month, and that in the event Debtor fails to pay said amounts, that the Debtor be required to immediately deliver to National City the equipment which is the subject of the Master Lease Agreements, or alternatively, for Relief from the Automatic Stay and for an Order awarding Movant an Administrative Claim for all monies coming due post-petition.

PLEASE TAKE FURTHER NOTICE that in support of this motion, National City will rely upon the supporting Application and Affidavit of Lisa Marie Moore filed

simultaneously herewith, together with any subsequent submissions and/or arguments of counsel.

PLEASE TAKE FURTHER NOTICE that the issues raised by this application involve the application of express provisions of the Bankruptcy Code.

Dated: 07/16/08

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Frank Peretore, Esq.  
Attorney for Movant

## CERTIFICATE OF SERVICE

I hereby certify that I today caused a copy of the within motion and supporting papers to be served upon the following via electronic notice or ordinary mail:

Quebecor World (USA) Inc.  
150 42<sup>nd</sup> Street  
New York, New York 10034

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