

**TODTMAN, NACHAMIE, SPIZZ & JOHNS, P.C.**  
Attorneys for **KBA North America, Inc. and L.D. Davis Industries, Inc.**  
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Janice B. Grubin  
Jill Makower

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11  
  
Quebecor World (USA) Inc., et al., : Case No.: 08-10152(JMP)  
 : (Jointly Administered)  
 : Debtors. :  
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**VERIFIED STATEMENT OF TODTMAN, NACHAMIE, SPIZZ  
& JOHNS, P.C. PURSUANT TO RULE 2019(a) OF THE FEDERAL  
RULES OF BANKRUPTCY PROCEDURE**

Todtman, Nachamie, Spizz & Johns, P.C. (“TNSJ”), pursuant to Rule 2019(a) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), submits this verified statement as an entity representing more than one creditor or equity security holder in the above-captioned Chapter 11 cases (the “Verified Statement”).

1. TNSJ has been engaged to represent multiple parties in connection with the above-captioned Chapter 11 cases. These parties (collectively, the “Entities”) include the following:

L.D. Davis Industries, Inc.  
1725 The Fairway  
Jenkintown, PA 19096-1400

KBA North America, Inc.  
2555 Regent Boulevard  
DFW Airport, TX 75261

2. The Entities each hold a claim against one or more of the above-captioned debtors (the “Debtors”) and is a defendant in their respective adversary proceeding

styled: (i) Eugene I. Davis, Litigation Trustee for the Quebecor World Litigation Trust v. L.D. Davis Industries, Inc., Adv. Pro. No. 10-01123; and (ii) Eugene I. Davis, Litigation Trustee for the Quebecor World Litigation Trust v. KBA North America, Inc., Adv. Pro. No. 10-01087.

3. Each of the Entities has separately retained TNSJ to represent their interests in connection with the above-captioned Chapter 11 cases.

4. Upon information and belief formed after due inquiry, TNSJ does not hold any claims against or equity interests in any of the Debtors.

5. TNSJ makes this Verified Statement solely for disclosure purposes pursuant to Bankruptcy Rule 2019(a), and nothing herein is, or should be construed as, an admission, acknowledgment, or waiver by the Entities.

6. TNSJ reserves the right to supplement this Verified Statement at any time in the future.

7. The undersigned hereby verifies under penalty of perjury that this Verified Statement is true and accurate, to the best of the undersigned's knowledge, information and belief.

Dated: New York, New York  
May 20, 2010

TODTMAN, NACHAMIE, SPIZZ & JOHNS, P.C.  
Attorneys for **Kba North America, Inc.**  
**and L.D. Davis Industries, Inc.**

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**CERTIFICATE OF SERVICE**

A copy of the Verified Statement of Todtman, Nachamie, Spizz & Johns, P.C. Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure was served via the Electronic Case Filing System on this 20<sup>th</sup> day of May 2010, upon the registered participants as identified on the Notice of Electronic Filing.

Dated: New York, New York  
May 20, 2010

s/ Janice B. Grubin  
Janice B. Grubin