

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION

In re:) Chapter 11
)
ASTROTURF, LLC,) Case No. 16-41504-PWB
)
Debtor.)
_____)

NOTICE OF (A) ENTRY OF ORDER CONDITIONALLY APPROVING DISCLOSURE STATEMENT AND APPROVING SOLICITATION PROCEDURES; (B) DEADLINE FOR CASTING VOTES TO ACCEPT OR REJECT CHAPTER 11 PLAN; (C) HEARING TO CONSIDER FINAL APPROVAL OF DISCLOSURE STATEMENT AND CONFIRMATION OF CHAPTER 11 PLAN AND (D) RELATED MATTERS

PLEASE TAKE NOTICE OF THE FOLLOWING:

1. Pursuant to an order dated March 9, 2017 [Docket No. 371] (the “Approval Order”), the United States Bankruptcy Court for the Northern District of Georgia, Rome Division (the “Court”) has (a) conditionally approved the *Disclosure Statement for Plan of Liquidation Filed by AstroTurf, LLC, dated March 6, 2017* [Docket No. 369] (the “Disclosure Statement”) filed by the above-captioned debtor and debtor in possession (the “Debtor”) and (b) authorized the Debtor to solicit votes to accept or reject *Plan of Liquidation for AstroTurf, LLC dated the 6th Day of March 2017* [Docket No. 368] (as may be amended, the “Plan”). All capitalized terms used but not defined herein shall have the meanings ascribed to them in the Plan.

2. The Approval Order establishes March 9, 2017 as the Voting Record Date for determining the holders of prepetition Claims entitled to vote to accept or reject the Plan and establishes April 18, 2017 as the Voting Deadline for submission of ballots to accept or reject the Plan (the “Ballots”). Holders of Claims entitled to vote to accept or reject the Plan will receive the following materials: (a) this Notice, (b) a copy of the Approval Order (without exhibits) to which this Notice corresponds, (c) the Disclosure Statement, (d) the Plan, (e) a letter from the Committee recommending that unsecured creditors vote to accept the Plan; and (f) one or more Ballots (and return envelopes) to be used in voting to accept or reject the Plan (collectively, the “Solicitation Package”). Failure to follow the instructions set forth in the Ballot may disqualify that Ballot and the vote represented thereby.

3. Holders of unimpaired Claims, Affiliate Unsecured Claims, Subordinated Unsecured Claims and Interests in the Debtor are not entitled to vote on the Plan and, therefore, will receive a notice of non-voting status rather than a Ballot.



4. If you wish to challenge the Debtor’s classification of your Claim or if your Claim is disputed, you must file a motion, pursuant to Bankruptcy Rule 3018(a) (a “Rule 3018(a) Motion”), for an order temporarily allowing your Claim in a different classification or amount for purposes of voting to accept or reject the Plan and serve such motion on the Debtor so that it is received by the later of (a) April 11, 2017 and (b) the seventh day after the date of service of a notice of an objection, if any, to your Claim. In accordance with Bankruptcy Rule 3018, as to any creditor filing a Rule 3018 Motion, such creditor’s Ballot will not be counted unless temporarily allowed by the Bankruptcy Court for voting purposes, after notice and a hearing on or prior to April 18, 2017 (*i.e.*, the last date fixed for creditors to vote to accept or reject the Plan). Rule 3018(a) Motions that are not timely filed and served in the manner as set forth above will not be considered.

5. A hearing to consider final approval of the Disclosure Statement and confirmation of the Plan (the “Confirmation Hearing”) will be held before Judge Paul W. Bonapfel at the United States Bankruptcy Court for the Northern District of Georgia, Courtroom 1401, 75 Spring Street, S.W., Atlanta, Georgia on **April 25, 2017, at 11:30 a.m. (local time in Atlanta, Georgia)**. The Confirmation Hearing may be continued from time to time without further notice other than the announcement of the adjourned date at the Confirmation Hearing or any continued hearing.

6. Objections, if any, to the Disclosure Statement and confirmation of the Plan must: (a) be in writing; (b) conform to the Bankruptcy Rules and the Local Rules; (c) state the name and address of the objecting party and the nature of the Claim or Interest of such party; (d) state with particularity the basis and nature of any objection; and (e) be served on the following parties (the “Notice Parties”) so as to be actually received no later than 5:00 p.m. (local time in Atlanta, Georgia) on April 18, 2017 (the “Disclosure Statement and Plan Objection Deadline):

- a. AstroTurf, LLC, c/o FTI Consulting, Inc., 1201 W. Peachtree Street, NW, Suite 500, Atlanta, Georgia 30309 (Attn: Sean Harding);
- b. King & Spalding LLP, 1180 Peachtree Street NE, Atlanta, Georgia 30309 (Attn: Paul Ferdinands);
- c. Office of The United States Trustee, Northern District of Georgia, Atlanta Division, 362 Richard B. Russell Building, 75 Spring Street, SW, Atlanta, Georgia 30303 (Attn: Martin Ochs); and
- d. Morris, Manning & Martin, LLP, 3343 Peachtree Road NE, Atlanta, Georgia 30326 (Attn: Frank W. DeBorde).

7. THE PLAN CONTAINS CERTAIN RELEASE, INJUNCTION AND EXCULPATION PROVISIONS. THESE PROVISIONS ARE SET FORTH IN THE PLAN AND DESCRIBED IN THE DISCLOSURE STATEMENT.

8. Requests for copies of the Disclosure Statement and the Plan (excluding certain exhibits thereto) by parties in interest may be made in writing to AstroTurf Ballot Processing Center, c/o Kurtzman Carson Consultants, LLC, 2335 Alaska Avenue, El Segundo, California 90245. In addition, any party may view and download the Plan, the Disclosure Statement and related exhibits (as they are filed) without charge at <http://www.kccllc.net/AstroTurf>. If you have any questions regarding this Notice, please call the Voting Agent at (866) 967-0676.

UNLESS AN OBJECTION IS TIMELY FILED AND SERVED AS PROVIDED HEREIN, IT MAY NOT BE CONSIDERED AT THE CONFIRMATION HEARING.

Dated: March 10, 2017

BY ORDER OF THE COURT

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