

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION

In re:	§	Chapter 11
	§	
BRIGGS & STRATTON	§	Case No. 20-43597-399
CORPORATION, et al.,	§	
	§	(Jointly Administered)
	§	
Debtors.	§	Related Docket No. 1012

**ORDER (I) ESTABLISHING DEADLINES FOR FILING REQUESTS
FOR PAYMENT OF GENERAL ADMINISTRATIVE EXPENSE CLAIMS
AND GOVERNMENTAL ADMINISTRATIVE EXPENSE CLAIMS
AND (II) APPROVING THE FORM AND MANNER OF NOTICE THEREOF**

Upon the motion (the “**Motion**”)¹ of Briggs & Stratton Corporation and its affiliated debtors in the above-captioned chapter 11 cases, as debtors and debtors in possession (collectively, the “**Debtors**”), for entry of an order, pursuant to sections 105(a) and 503(a) of the Bankruptcy Code and Bankruptcy Rules 2002 and 3003(c), (i) establishing deadlines for filing requests for payment of administrative expense claims and (ii) approving the form and manner of notice thereof, all as more fully described in the Motion; and this Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and consideration of the Motion and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and it appearing that venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and the Debtors having represented that adequate and proper notice of the Motion has been given and that no other or further notice need be given; and this Court having reviewed the Motion; and this Court having held a hearing to consider the relief requested in the Motion; and this Court having determined that the legal and factual bases set forth in the Motion establish just

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.



cause for the relief granted herein; and it appearing that the relief requested in the Motion is in the best interests of the Debtors and their respective estates and creditors; and upon all of the proceedings had before this Court and after due deliberation and sufficient cause appearing therefor, **it is hereby ORDERED that the Motion is GRANTED in that:**

1. Except as otherwise provided herein, all persons and entities (including, without limitation, individuals, partnerships, corporations, joint ventures, and trusts), other than Governmental Units, that assert an entitlement to administrative expense status under sections 503 (excluding holders of claims under section 503(b)(9)) and/or 507 of the Bankruptcy Code that arose between July 20, 2020 (the “**Petition Date**”) and October 19, 2020 (each, a “**General Administrative Expense Claim**” and collectively, the “**General Administrative Expense Claims**”), shall file an Administrative Expense Proof of Claim so that it is received on or before **November 23, 2020 at 5:00 p.m. (Central Time)** (the “**General Administrative Expense Bar Date**”).

2. Except as otherwise provided herein, all Governmental Units that assert an entitlement to administrative expense status under sections 503 and/or 507 of the Bankruptcy Code that arose between the Petition Date and October 19, 2020 (each, a “**Governmental Administrative Expense Claim**” and collectively, the “**Governmental Administrative Expense Claims**” and together with the General Administrative Expense Claims, the “**Administrative Expense Claims**”), shall file an Administrative Expense Proof of Claim so that it is received on or before **January 19, 2021 at 5:00 p.m. (Central Time)** (the “**Governmental Administrative Expense Bar Date**” and together with the General Administrative Expense Bar Date, the “**Administrative Expense Bar Dates**”).

3. Nothing herein extends or alters the deadlines to file claims set forth in *Order (I) Establishing Deadlines for Filing Proofs of Claim and Procedures Relating Thereto and (II) Approving Form and Manner of Notice Thereof* [Docket No. 564].

4. The following procedures for filing Administrative Expense Proofs of Claim shall apply:

- i. Administrative Expense Proofs of Claim must conform substantially to the Administrative Expense Claim Form annexed hereto as Exhibit 2.
- ii. Administrative Expense Proofs of Claim either must be filed (i) through the CM/ECF system on the Court's website at <https://ecf.moeb.uscourts.gov/cgi-bin/login.pl>, (ii) electronically using the Electronic Proof of Claim (ePOC) Program on the Court's website at <https://www.moeb.uscourts.gov/epoc-electronic-proof-claim-filing>, (iii) sent by first-class mail or overnight courier to the Clerk of the Bankruptcy Court, Eastern District of Missouri, 111 S. 10th St., 4th Floor, St. Louis, MO 63102; or (iv) sent by first-class mail, overnight courier, or hand-delivery to Briggs Claims Processing Center, c/o KCC, 222 N. Pacific Coast Highway, Suite 300, El Segundo, CA 90245. Administrative Expense Proofs of Claim may NOT be delivered by facsimile or electronic mail transmission.
- iii. Administrative Expense Proofs of Claim will be deemed filed only if actually received by the Clerk of the Court or KCC on or before the applicable Administrative Expense Bar Date by one of the approved methods of filing provided herein.
- iv. Administrative Expense Proofs of Claim must (a) be signed by the claimant, or, if the claimant is not an individual, by an authorized agent of the claimant under penalty of perjury; (b) set forth with specificity the legal and factual bases for the alleged claim; (c) include supporting documentation (if voluminous, attach a summary) or explanation as to why documentation is not available; (d) be in the English language; and (e) be denominated in United States currency (using the exchange rate, if applicable, as of July 20, 2020).
- v. Administrative Expense Proofs of Claim must specify by name and case number the Debtor against which the General Administrative Expense Claim or Governmental Administrative Expense Claim is filed; if the holder asserts a General Administrative Expense Claim or Governmental Administrative Expense Claim against more than one Debtor or has a General Administrative Expense Claim or Governmental Administrative

Expense Claim against different Debtors, a separate Administrative Expense Proof of Claim must be filed with respect to each Debtor.

- vi. The following persons and entities are *not* required to file an Administrative Expense Proof of Claim on or before the applicable Administrative Expense Bar Date in order to retain their rights to assert the claims identified below:
- a. any person or entity that already has filed in proper form an Administrative Expense Proof of Claim against the Debtors in the above-captioned chapter 11 cases, which claim sets forth with specificity the legal and factual basis for the claim and includes supporting documentation upon which the claimant relies to support the General Administrative Expense Claim or Governmental Administrative Expense Claim in a form substantially similar to the Administrative Expense Claim Form;
 - b. any holder of a General Administrative Expense Claim or Governmental Administrative Expense Claim that has been allowed by order of this Court entered on or before the applicable Administrative Expense Bar Date;
 - c. any person or entity whose General Administrative Expense Claim or any Governmental Unit whose Governmental Administrative Expense Claim has been paid in full by any of the Debtors;
 - d. any holder of a General Administrative Expense Claim or Governmental Administrative Expense Claim for which specific deadlines previously have been fixed by this Court;
 - e. any counterparty to an executory contract or unexpired lease of nonresidential real property that was assumed and assigned to Bucephalus Buyer, LLC, pursuant to the *Order (I) Authorizing the Sale of the Assets and Equity Interests to the Purchaser Free and Clear of Liens, Claims, Interests, and Encumbrances; (II) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (III) Granting Related Relief* [Docket No. 898] (the “**Sale Order**”);
 - f. any person or entity whose General Administrative Expense Claim or any Governmental Unit whose Governmental Administrative Expense Claim is on account of any open purchase orders;
 - g. any person who was employed by any Debtor subsequent to the Petition Date;
 - h. any professional retained by the Debtors or the Creditors’ Committee under sections 327, 328, 363 or 1103 of the Bankruptcy Code and whose claim is for services performed and reimbursements of expenses incurred in these cases; and

- i. the Office of the U.S. Trustee, including any requests for payment of quarterly fees.

5. Pursuant to Bankruptcy Rule 3003(c)(2), any holder of a General Administrative Expense Claim or Governmental Administrative Expense Claim that fails to comply with this Order by timely filing an Administrative Expense Proof of Claim in appropriate form by the applicable Administrative Expense Bar Date shall not be treated as an administrative creditor with respect to such claim for the purpose of distribution. Such holder shall be forever barred, estopped, and enjoined from asserting such claim against the Debtors and their property, and the Debtors and their property will be discharged from all indebtedness or liability with respect to any such claim. Moreover, the holder of such claim shall not be permitted to participate in any distribution in these chapter 11 cases on account of such claim, or receive further notices regarding such claim.

6. A copy of the notice substantially in the form annexed hereto as Exhibit 1 (the “**Administrative Expense Bar Date Notice**”) hereby is approved and shall be deemed adequate and sufficient if served by first-class mail at least thirty (30) days prior to the General Administrative Expense Bar Date on:

- i. the Office of the U.S. Trustee;
- ii. counsel for the Creditors’ Committee;
- iii. all parties known to the Debtors as having an actual or potential Administrative Expense Claim or Governmental Administrative Expense Claim against any of the Debtors’ estates;
- iv. all parties who have requested notice of the proceedings in these chapter 11 cases as of the date of entry of an order in respect of this Motion;
- v. all parties to executory contracts and unexpired leases of the Debtors; and
- vi. such additional persons and entities deemed appropriate by the Debtors.

7. The Debtors shall post the Administrative Expense Claim Form and the Administrative Expense Bar Date Notice on the website established by KCC for these chapter 11 cases: <https://www.kccllc.net/briggs>.

8. Pursuant to Bankruptcy Rule 2002(f), the Debtors shall publish the Administrative Expense Bar Date Notice, with any necessary modifications for ease of publication, once in the national edition of *The New York Times* and the *St. Louis Dispatch*, subject to applicable publication deadlines, prior to the General Administrative Expense Bar Date, which publication hereby is approved and shall be deemed good, adequate, and sufficient publication notice of the Administrative Expense Bar Dates.

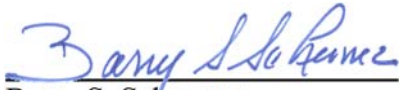
9. Nothing contained in the Motion or this Order or any payment made pursuant to the authority granted by this Order is intended to be or shall be deemed as (i) an admission as to the validity of any claim against the Debtors, (ii) a waiver of the Debtors' or any party in interest's rights to dispute the amount of, basis for, or validity of any claim, (iii) a waiver of the Debtors' rights under the Bankruptcy Code or any other applicable nonbankruptcy law, (iv) an agreement or obligation to pay any claims, or (v) a waiver of any claims or causes of action which may exist against any creditor or interest holder.

10. The Debtors are authorized and empowered to take all actions necessary or appropriate to carry out the relief granted in this Order.

11. Not later than two (2) business days after the date of this Order, the Debtors shall serve a copy of the Order and shall file a certificate of service no later than twenty-four (24) hours after service.

DATED: October 19, 2020
St. Louis, Missouri

cke


Barry S. Schermer
United States Bankruptcy Judge

Order Prepared By:

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*Local Counsel to the Debtors and
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-and-

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Exhibit 1

Administrative Expense Bar Date Notice

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION**

In re: BRIGGS & STRATTON CORPORATION, et al., Debtors.	§ § § § § § §	Chapter 11 Case No. 20-43597-399 (Jointly Administered)
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**NOTICE OF DEADLINE REQUIRING FILING
PROOFS OF CLAIM FOR ADMINISTRATIVE EXPENSE CLAIMS**

TO ALL PERSONS AND ENTITIES WITH CLAIMS AGAINST THE DEBTORS SET FORTH BELOW:

Name of Debtor	Case Number	Tax Identification Number (Last Four Digits)
Briggs & Stratton Corporation	20-43597	2330
Allmand Bros., Inc.	20-43598	4710
Briggs & Stratton International, Inc.	20-43599	9957
Briggs & Stratton Tech, LLC	20-43600	2102
Billy Goat Industries, Inc.	20-10575	4442
OTHER NAMES USED BY THE DEBTORS IN THE PAST 8 YEARS:		
Briggs & Stratton Power Products Group, LLC Briggs & Stratton Power Products, LLC Briggs & Stratton Power Products Group		
<u>Attorneys for Debtors</u> Robert E. Eggmann Christopher J. Lawhorn Thomas H. Riske CARMODY MACDONALD P.C. 120 S. Central Avenue, Suite 1800 St. Louis, Missouri 63105 Telephone: (314) 854-8600 Facsimile: (314) 854-8660		<u>Attorneys for Debtors</u> Ronit J. Berkovich Debora A. Hoehne Martha E. Martir WEIL, GOTSHAL & MANGES LLP 767 Fifth Avenue New York, New York 10153 Telephone: (212) 310-8000 Facsimile: (212) 310-8007
<u>Address of the Clerk of the Bankruptcy Court</u> United States Bankruptcy Court Eastern District of Missouri 111 South 10th Street, Fourth Floor St. Louis, MO 63102 T: (314) 244-4500 Office Hours: 8:30 a.m.–4:30 p.m. Monday–Friday		

PLEASE TAKE NOTICE THAT:

YOU ARE RECEIVING THIS NOTICE (“**NOTICE**”) BECAUSE YOU MAY HAVE A CLAIM AGAINST THE DEBTORS IN THE ABOVE-CAPTIONED CHAPTER 11 CASES. HOWEVER, THE FACT THAT YOU ARE RECEIVING THIS NOTICE DOES NOT MEAN THAT THE DEBTORS BELIEVE THAT YOU HAVE A CLAIM AGAINST THE DEBTORS OR THAT YOU ACTUALLY HAVE A CLAIM AGAINST THE DEBTORS. THEREFORE, YOU SHOULD READ THIS NOTICE CAREFULLY AND CONSULT AN ATTORNEY IF YOU HAVE ANY QUESTIONS, INCLUDING WHETHER YOU SHOULD FILE A PROOF OF CLAIM.

On July 20, 2020 (the “**Petition Date**”), Briggs & Stratton Corporation and certain of its affiliates (collectively, the “**Debtors**”), filed voluntary cases under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”) in the United States Bankruptcy Court for the Eastern District of Missouri (the “**Bankruptcy Court**”).

On October 19, 2020, the Bankruptcy Court, having jurisdiction over the chapter 11 cases of the Debtors, entered an order (the “**Administrative Bar Date Order**”)¹ establishing certain dates by which certain parties holding administrative expense claims against the Debtors must file proofs of claim.

For your convenience, enclosed with this notice (the “**Notice**”) is an Administrative Expense Claim Form. As used in this Notice, the term “entity” has the meaning given to it in section 101(15) of the Bankruptcy Code, and includes all persons, estates, trusts, governmental units, and Office of the United States Trustee. In addition, the terms “persons” and “Governmental Units” are defined in sections 101(41) and 101(27) of the Bankruptcy Code, respectively.

You may be a creditor of one or more of the Debtors. However, the fact that you have received this Notice does not mean that the Debtors believe that you have a claim against the Debtors or that that you actually have claim against the Debtors. You should not file an Administrative Expense Proof of Claim if you do not have a claim against a Debtor. You should consult an attorney if you have any questions, including whether you should file an Administrative Expense Proof of Claim.

If you have any questions relating to this Notice, you may contact the Debtors’ claims and noticing agent, Kurtzman Carson Consultants, LLC (“KCC”), by telephone at (866) 544-7045 (U.S./Canada) or (781) 575-2084 (International) or by e-mail at <http://www.kccllc.net/Briggs/inquiry>.

NOTE: The staff of the Bankruptcy Clerk’s Office, the Office of the United States Trustee, and KCC cannot give legal advice.

THE BAR DATES

The Administrative Bar Date Order establishes:

- i. **November 23, 2020 at 5:00 p.m. (Central Time)** as the deadline (the “**General Administrative Expense Bar Date**”) for each person or entity, other than a Governmental Unit, that asserts entitlement to administrative priority status under sections 503 (but excluding claims under section 503(b)(9)) and/or 507 of the Bankruptcy Code for claims that arose between

¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Administrative Bar Date Order.

the Petition Date and October 19, 2020 (each, a “**General Administrative Expense Claim**,” collectively, the “**General Administrative Expense Claims**”); and

- ii. **January 19, 2021 at 5:00 p.m. (Central Time)** as the deadline (the “**Governmental Administrative Expense Bar Date**” and together with the General Administrative Expense Bar Date, the “**Administrative Expense Bar Dates**”) for each Governmental Unit that asserts entitlement to administrative priority status under sections 503 and/or 507 of the Bankruptcy Code for claims that arose between the Petition Date and October 19, 2020 (each, a “**Governmental Administrative Expense Claim**,” collectively, the “**Governmental Administrative Expense Claims**” and together with the General Administrative Expense Claims, the “**Administrative Expense Claims**”).

Claimants should use reasonable best efforts to assign General Administrative Expense Claims and Governmental Administrative Expense Claims to the appropriate dates as listed on the Proof of Administrative Expense Claim Form, and the Debtors and claimant, in consultation with the creditors’ committee, will work in good faith to reconcile such claims to the appropriate date.

WHO MUST FILE A PROOF OF ADMINISTRATIVE CLAIM

Any party with a General Administrative Expense Claim or Governmental Administrative Expense Claim that arose between the Petition Date and October 19, 2020, and such claim is not one of the types of claims described below, whether such claims are not now fixed, liquidated, or certain.

As used in this Notice, the term “claim” means, as to or against the Debtors and in accordance with section 101(5) of the Bankruptcy Code: (a) any right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured; or (b) any right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured.

Administrative Expense Claims include claims for workers’ compensation for incidents occurring in the time period mentioned above.

PARTIES WHO DO NOT NEED TO FILE AN ADMINISTRATIVE EXPENSE PROOF OF CLAIM

Certain parties are not required to file an Administrative Expense Proof of Claim. The Court may, however, enter one or more separate orders at a later time requiring creditors to file Administrative Expense Proofs of Claim for some kinds of the following claims and setting related deadlines. If the Court does enter such an order, you will receive notice of it. The following entities holding claims that would otherwise be subject to the applicable Administrative Claims Bar Date need not file Administrative Expense Proofs of Claim:

- b. any person or entity that already has filed in proper form an Administrative Expense Proof of Claim against the Debtors in the above-captioned chapter 11 cases, which claim sets forth with specificity the legal and factual basis for the claim and includes supporting documentation upon which the claimant relies to support the General Administrative Expense Claim or Governmental Administrative Expense Claim in a form substantially similar to the Administrative Expense Claim Form;
- c. any holder of a General Administrative Expense Claim or Governmental Administrative Expense Claim that has been allowed by order of this Court entered on or before the applicable Administrative Expense Bar Date;
- d. any person or entity whose General Administrative Expense Claim or any Governmental Unit whose Governmental Administrative Expense Claim has been paid in full by any of the Debtors;
- e. any holder of a General Administrative Expense Claim or Governmental Administrative Expense Claim for which specific deadlines previously have been fixed by this Court;
- f. any counterparty to an executory contract or unexpired lease of nonresidential real property that was assumed and assigned to Bucephalus Buyer, LLC, pursuant to the *Order (I) Authorizing the Sale of the Assets and Equity Interests to the Purchaser Free and Clear of Liens, Claims, Interests, and Encumbrances; (II) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (III) Granting Related Relief* [Docket No. 898] (the “**Sale Order**”);
- g. any person or entity whose General Administrative Expense Claim or any Governmental Unit whose Governmental Administrative Expense Claim is on account of any open purchase orders;
- h. any person who was employed by any Debtor subsequent to the Petition Date;
- i. any professional retained by the Debtors or the Creditors’ Committee under sections 327, 328, 363 or 1103 of the Bankruptcy Code and whose claim is for services performed and reimbursements of expenses incurred in these cases; and
- j. the Office of the U.S. Trustee, including any requests for payment of quarterly fees.

This Notice may be sent to many persons and entities that have had some relationship with or have done business with the Debtors but may not have an unpaid claim against the Debtors. The fact that you have received this Notice does not mean that you have a General Administrative Expense Claim, a Governmental Administrative Expense Claim, or any other type

of claim or that the Debtors or the Bankruptcy Court believe that you have a claim against the Debtors.

WHAT TO FILE

The Debtors are enclosing an Administrative Expense Claim Form for use in these cases. Additional Administrative Expense Claim Forms may be obtained at the website established by the Debtors' Court-approved claims and noticing agent, KCC, located at <https://www.kccllc.net/Briggs>.

All Administrative Expense Claim Forms must be signed by the claimant or, if the claimant is not an individual, by an authorized agent of the claimant. It must be written in English and be denominated in United States currency (using the exchange rate, if applicable, as of the Petition Date). You must set forth with specificity the legal and factual bases for your claim. You also should attach to your completed Administrative Expense Claim Form any documents on which the Administrative Expense Claim or Governmental Administrative Expense Claim is based (if voluminous, attach a summary) or explanation as to why the documents are not available.

Your Administrative Expense Claim Form must not contain complete social security numbers or taxpayer identification numbers (only the last four (4) digits), a complete birth date (only the year), the name of a minor (only the minor's initials), or a financial account number (only the last four (4) digits of such account number).

Any holder of a General Administrative Expense Claim or a Governmental Administrative Expense Claim against more than one Debtor must file a separate Administrative Expense Proof of Claim with respect to each such Debtor. Any holder of a claim must identify on its Administrative Expense Proof of Claim the specific Debtor against which its claim is asserted and the case number of that Debtor's bankruptcy case. A list of the Debtors and their respective case numbers is set forth above on the first page of this Notice.

WHEN AND WHERE TO FILE

Except as provided for herein, all Administrative Expense Proofs of Claim must be filed so as to be received **on or before November 23, 2020 at 5:00 p.m. (Central Time)** for General Administrative Expense Claims and **on or before January 19, 2021 at 5:00 p.m. (Central Time)** for Governmental Administrative Expense Claims as follows:

IF BY FIRST CLASS MAIL OR OVERNIGHT DELIVERY:

Clerk of the Bankruptcy Court
Eastern District of Missouri
111 S. 10th St., 4th Floor
St. Louis, MO 63102

IF BY FIRST CLASS MAIL, OVERNIGHT DELIVERY, OR BY HAND:

Briggs Claims Processing Center
c/o KCC

222 N. Pacific Coast Highway, Suite 300
El Segundo, CA 90245

IF ELECTRONICALLY:

By using the CM/ECF system on the Court's website at <https://ecf.moeb.uscourts.gov/cgi-bin/login.pl> or via the Electronic Proof of Claim (ePOC) Program on the Court's website at <https://www.moeb.uscourts.gov/epoc-electronic-proof-claim-filing>.

**CONSEQUENCES OF FAILURE TO FILE AN ADMINISTRATIVE
EXPENSE PROOF OF CLAIM BY THE ADMINISTRATIVE CLAIMS BAR DATE**

ANY HOLDER OF A GENERAL ADMINISTRATIVE EXPENSE CLAIM OR GOVERNMENTAL ADMINISTRATIVE EXPENSE CLAIM THAT IS NOT EXEMPTED FROM THE REQUIREMENTS OF THE ADMINISTRATIVE EXPENSE BAR DATE ORDER, AS SET FORTH ABOVE, AND THAT FAILS TO TIMELY FILE AN ADMINISTRATIVE EXPENSE PROOF OF CLAIM IN THE APPROPRIATE FORM SHALL NOT BE TREATED AS AN ADMINISTRATIVE CREDITOR WITH RESPECT TO SUCH CLAIM FOR THE PURPOSE OF PARTICIPATING IN ANY DISTRIBUTION IN THE DEBTORS' CASES ON ACCOUNT OF SUCH CLAIM.

A holder of a potential General Administrative Expense Claim or Governmental Administrative Expense Claim against the Debtors should consult an attorney regarding any matters not covered by this Notice, such as whether the holder should file an Administrative Expense Proof of Claim.

RESERVATION OF RIGHTS

Nothing contained in this Notice is intended to or should be construed as a waiver of the Debtors' right to: (a) dispute, or assert offsets or defenses against, any filed claim or any claim listed or reflected in the Schedules as to the nature, amount, liability, or classification thereof; (b) subsequently designate any scheduled claim as disputed, contingent, or unliquidated; and (c) otherwise amend or supplement the Schedules.

If you require additional information regarding the filing of a proof of claim, you may contact the Debtors' Claims and Noticing Agent, KCC, by telephone at (866) 544-7045 (U.S./Canada) or (781) 575-2084 (International) or by e-mail at <http://www.kccllc.net/Briggs/inquiry>.

THIS NOTICE MAY BE SENT TO MANY PERSONS THAT HAVE HAD SOME RELATIONSHIP WITH OR HAVE DONE BUSINESS WITH THE DEBTORS BUT MAY NOT HAVE AN UNPAID CLAIM AGAINST THE DEBTORS. THE FACT THAT YOU HAVE RECEIVED THIS NOTICE DOES NOT MEAN THAT THE DEBTORS BELIEVE THAT YOU HAVE A CLAIM AGAINST THE DEBTORS OR THAT YOU ACTUALLY HAVE A CLAIM AGAINST THE DEBTORS. YOU SHOULD NOT FILE AN ADMINISTRATIVE EXPENSE PROOF OF CLAIM IF YOU DO NOT HAVE A GENERAL ADMINISTRATIVE EXPENSE CLAIM OR GOVERNMENTAL ADMINISTRATIVE EXPENSE CLAIM AGAINST ANY OF THE DEBTORS. YOU SHOULD CONSULT AN ATTORNEY IF YOU HAVE ANY QUESTIONS, INCLUDING WHETHER YOU SHOULD FILE AN ADMINISTRATIVE EXPENSE PROOF OF CLAIM.

Exhibit 2

Administrative Expense Claim Form

Pg 16 of 16