

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:) Case No. 08-36642-KLP
)
CANAL CORPORATION, *et al.*,) Chapter 11
)
Debtors.¹) (Jointly Administered)

**NOTICE OF (I) DISCLOSURE STATEMENT; (II) MOTION TO APPROVE
DISCLOSURE STATEMENT AND FOR RELATED RELIEF;
AND (III) HEARING AND OBJECTION DEADLINE
CONCERNING DISCLOSURE STATEMENT AND MOTION**

PLEASE TAKE NOTICE THAT on January 6, 2021, debtor WTM I Company (“WTM”), by its undersigned counsel, filed with the United States Bankruptcy Court for the Eastern District of Virginia (the “Court”):

- (i) the *Disclosure Statement With Respect to Plan of Liquidation of WTM I Company* (the “Disclosure Statement”);
- (ii) the *Motion for Order (I) Approving the Disclosure Statement; (II) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject the Plan, Including (A) Approving Form and Manner of Solicitation Procedures, (B) Approving Form and Notice of the Confirmation Hearing, (C) Establishing Record Date and Approving Procedures for Distribution of Solicitation Packages, (D) Approving Forms of Ballots, (E) Establishing Deadline for Receipt of Ballots and (F) Approving Procedures for Vote Tabulations; (III) Establishing Deadline and Procedures for Filing Objections (A) to Confirmation of the Plan and (B) to Proposed Cure Amounts; and (IV) Granting Related Relief* (the “Motion”); and
- (iii) the *Plan of Liquidation of WTM I Company* (the “Plan”).

¹ The Debtors whose chapter 11 cases have not been closed and the last four digits of their respective taxpayer identification numbers are as follows: Canal Corporation (f/k/a Chesapeake Corporation) (6880), Canal NC Company (f/k/a Chesapeake Printing and Packaging Company) (9208), Canal NY Company, Inc. (f/k/a Chesapeake Pharmaceutical Packaging Company, Inc.) (0010), and WTM I Company (1080).

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PLEASE TAKE FURTHER NOTICE THAT true and complete copies of the Disclosure Statement, the Motion and the Plan may be viewed at no charge at www.kccllc.net/chesapeake or for a fee via PACER at <http://www.vaeb.uscourts.gov/>, or may be obtained at no charge by writing to WTM I Company c/o Kurtzman Carson Consultants, 222 N. Pacific Coast Highway, Suite 300, El Segundo, California 90245.

PLEASE TAKE FURTHER NOTICE THAT your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in these bankruptcy cases. (If you do not have an attorney, you may wish to consult one.)

PLEASE TAKE FURTHER NOTICE THAT in connection with the Debtors' chapter 11 cases, an *Order Establishing Certain Notice, Case Management and Administrative Procedures* [Docket No. 43] (the "Case Management Order") was entered by the Court on December 30, 2008, which, among other things, prescribes the manner in which objections must be filed and served and when hearings will be conducted. A copy of the Case Management Order may be obtained at no charge at www.kccllc.net/chesapeake or for a fee via PACER at <http://www.vaeb.uscourts.gov/>.

PLEASE TAKE FURTHER NOTICE THAT in accordance with the Case Management Order, if you wish to oppose the approval of the Disclosure Statement or any other relief requested in the Motion, then **on or before 5:00 p.m. Eastern Time, February 3, 2021, or such shorter time as the Court may hereafter order and of which you may receive subsequent notice (the "Objection Deadline")**, you must file with the Court, at the address shown below, a written objection pursuant to Rule 9013-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the Eastern District of Virginia and the Case Management Order:

Clerk of the Court
United States Bankruptcy Court
701 East Broad Street, Suite 4000
Richmond, Virginia 23219

PLEASE TAKE FURTHER NOTICE THAT in accordance with the Case Management Order, you must also serve a copy of your written objection on the Core Group, the 2002 List and the Affected Entities as such terms are defined in Exhibit 1 to the Case Management Order so that the documents **are received on or before the Objection Deadline.**

PLEASE TAKE FURTHER NOTICE THAT a hearing on the approval of the Disclosure Statement and the other relief requested in the Motion has been scheduled for **February 10, 2021, at 11:00 a.m. Eastern Time** before Judge Keith L. Phillips, United States Bankruptcy Court for the Eastern District of Virginia.

Parties may participate in the Hearing by registering through the following link:

<https://www.zoomgov.com/meeting/register/vJlscuGsqqz8rHbRLfaGkCJoAnsZXHtd0eTc>

PLEASE TAKE FURTHER NOTICE THAT if you do not timely file and serve a written objection to the approval of the Disclosure Statement or other relief requested in the Motion, the Court may deem opposition waived, treat the Motion as conceded and enter an order approving the Disclosure Statement and granting the other relief requested in the Motion without further notice or hearing.

PLEASE TAKE FURTHER NOTICE THAT you should consult the Case Management Order before filing any written objection to the approval of the Disclosure Statement or other relief requested in the Motion.

Dated: Richmond, Virginia
January 6, 2021

HUNTON & WILLIAMS LLP

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