

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

	X	
In re:	:	Case No. 08-36642-KLP
	:	
CANAL CORPORATION, <i>et al.</i> ,	:	Chapter 11
	:	
Debtors. ¹	:	(Jointly Administered)
	:	
	:	
	X	

**DECLARATION OF ANGELA M. NGUYEN REGARDING TABULATION
OF BALLOTS WITH RESPECT TO VOTE ON AMENDED PLAN OF LIQUIDATION OF
WTM I COMPANY**

I, Angela M. Nguyen, declare and state as follows:

1. I am a Managing Director of Corporate Restructuring Services, employed by Kurtzman Carson Consultants LLC (“KCC”) located at 222 N. Pacific Coast Highway, 3rd Floor, El Segundo, CA 90245. I am over the age of 18 and not a party to this action.

2. I submit this declaration with respect to the solicitation and tabulation of votes cast on the *Amended Plan of Liquidation of WTM I Company* (Docket No. 2422) (the “Plan”)². Except as otherwise noted, I could and would testify to the following based upon my personal knowledge, knowledge that I acquired from individuals under my supervision, and my review of relevant documents. I am authorized to submit this Declaration on behalf of KCC.

3. On December 30, 2008, the Court entered the *Order Authorizing the Employment and Retention of Kurtzman Carson Consultants LLC as Notice, Claims and Balloting Agent for the*

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).

² Terms not otherwise defined herein shall have the same meanings ascribed to them in the Disclosure Statement Order



Debtors and Debtors in Possession (Docket No. 60) (the “Retention Order”). The Retention Order authorizes KCC to assist the Debtors with, among other things, the service of solicitation materials and tabulation of votes cast to accept or reject the Plan. KCC has considerable experience in soliciting and tabulating votes to accept or reject proposed plans of reorganization.

4. On February 10, 2021, the Court entered the *Order (I) Approving the Disclosure Statement; (II) 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* (Docket No. 2429) (the “Disclosure Statement Order”) establishing, among other things, certain solicitation and voting tabulation procedures.

5. Pursuant to the Disclosure Statement Order, KCC worked with counsel to WTM I Company (“WTM”) to solicit votes to accept or reject the Plan and to tabulate the ballots of creditors voting to accept or reject the Plan.

A. Service and Transmittal of Solicitation Packages and Related Information

6. On February 17, 2021, KCC caused to be served Solicitation Packages in accordance with the Disclosure Statement Order. A certificate evidencing KCC’s service of the foregoing was filed with the Court on February 24, 2021 as Docket No. 2434.

7. On or before February 17, 2021, KCC posted links on the Debtors’ restructuring website maintained by KCC at www.kccllc.net/chesapeake, providing parties with, among other documents, copies of the Plan, the Disclosure Statement and the Disclosure Statement Order.

B. The Tabulation Process

8. The Disclosure Statement Order established February 10, 2021, as the date for determining which creditors and holders of interests were entitled to receive Solicitation Packages and, where applicable, vote on the Plan (the “Record Date”). Pursuant to the Disclosure Statement Order, holders of claims in Class 3 (General Unsecured Claims) and Class 4 (FTB Settlement Claim) were entitled to vote to accept or reject the Plan (collectively, the “Voting Classes”). No other classes were entitled to vote on the Plan.

9. Pursuant to the Disclosure Statement Order, KCC, with the assistance of counsel to WTM, relied on the Schedules of Assets and Liabilities filed by WTM on February 10, 2009, and the claims information pertaining to WTM’s chapter 11 case as reflected in KCC’s CaseView (“KCC CaseView”) system in order to identify the holders of claims entitled to vote to accept or reject the Plan.

10. Using the information outlined above KCC created a voting database reflecting the names of holders in the Voting Classes, addresses of such holders, voting amounts and classification of claims in the Voting Classes.

11. Using KCC CaseView and the voting database, KCC generated ballots for holders of Claims entitled to vote to accept or reject the Plan. The Disclosure Statement Order established March 17, 2021 at 5:00 p.m. (Prevailing Pacific Time) as the deadline for receiving ballots to accept or reject the Plan (the “Voting Deadline”).

12. Pursuant to the Disclosure Statement Order, KCC received and tabulated Ballots as follows: (a) each returned Ballot was opened and inspected at KCC’s office; (b) Ballots were date-stamped and scanned into KCC CaseView; (c) all Ballots received on or before the Voting Deadline were then entered into the KCC CaseView and tabulated in accordance with the tabulation rules outlined in the Disclosure Statement Order.

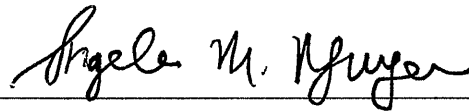
13. Set forth below is a summary of the voting results with respect to the Voting Classes tabulated on a consolidated basis:

Total Ballots Received			
Accept		Reject	
Number	Amount	Number	Amount
Class 3 – General Unsecured Claims			
1 (100.00%)	\$128,297.14 (100.00%)	0 (0.00%)	\$0.00 (0.00%)
Class 4 – FTB Settlement Claim			
1 (100.00%)	\$N/A (100.00%)	0 (0.00%)	\$0.00 (0.00%)

14. The final ballot report containing the consolidated summary ballot report of the Voting Classes is attached hereto as **Exhibit A**. The detailed ballot reports for Voting Classes 3 and 4 are attached hereto as **Exhibits A-1** and **A-2**.

15. To the best of my knowledge, information and belief, the foregoing information concerning the distribution, submission and tabulation of Ballots in connection with the Plan is true. The Ballots received by KCC are stored at KCC’s office and are available for inspection by, or submission to, this Court.

Dated: March 22, 2021



Angela M. Nguyen
 KCC
 222 N Pacific Coast Highway, 3rd Floor
 El Segundo, CA 90245
 Tel 310.823.9000

EXHIBIT A

Exhibit A
Final Tabulation Results
Ballot Summary Report

Class Name	Class Description	Unacceptable Votes	Members Voted	Members Accepted	Members Rejected	Members Abstained	% Members Accepted	% Members Rejected	Total \$ Voted	\$ Accepted	\$ Rejected	\$ Abstained	% \$ Accepted	% \$ Rejected
3	General Unsecured Claims	0	1	1	0	0	100.00%	0.00%	\$128,297.14	\$128,297.14	\$0.00	\$0.00	100.00%	0.00%
4	FTB Settlement Claim	0	1	1	0	0	100.00%	0.00%	N/A	N/A	\$0.00	\$0.00	100.00%	0.00%

Exhibit A-1

Class 3 General Unsecured Claims

Date Filed	Ballot No.	Creditor Name	Class	Voting Amount	Vote
03/15/2021	267	Quarles & Brady LLP	3 General Unsecured Claims	\$128,297.14	Accept

Exhibit A-2

Class 4 FTB Settlement Claim

Date Filed	Ballot No.	Creditor Name	Class	Voting Amount	Vote
03/04/2021	266	Franchise Tax Board	4 FTB Settlement Claim	N/A	Accept