

IN THE UNITED STATE BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re)	Chapter 11
)	
NEWPAGE CORPORATION, et al,)	Case No. 11-12804 (KG)
)	Joint Administration Requested
Debtors.)	
)	Related Docket No. 300

2012 MAR 15 10:11 AM
 11-12804-300-21
 DEPT. OF CLERK OF COURT
 BANKRUPTCY COURT
 DISTRICT OF DELAWARE

**WITHDRAWAL OF RECLAMATION DEMAND
SUBMITTED BY TRANE US INC.**

WHEREAS, on September 21, 2011, Trane, through its counsel, mailed its reclamation demand letter (hereinafter “Reclamation Demand Letter”) to Escanaba Paper Company and NewPage Corporation, Debtors, with a copy mailed to the Pachulski Stang Ziehl & Jones, LLP firm, in order to assert Trane’s reclamation demand of \$246,426.68;

WHEREAS, on November 17, 2011, and in order to comply with an Order of the Bankruptcy Court dated October 4, 2011, Trane, through its counsel, mailed its written reclamation demand letter (hereinafter “Written Reclamation Demand”) to several parties, including NewPage Corporation, Dewey & LeBouef LLP, Pachulski Stang Ziehl & Jones, LLP, and Davis Polk and Wardwell, LLP;

WHEREAS, on January 23, 2012, in response to the Debtors’ “Notice of Debtors’ Report of Reclamation Claims” document dated January 5, 2012, Trane, through its counsel, mailed its written “Reclamation Notice Objection of Trane US Inc.” document to the Clerk of Bankruptcy Court for filing, with copies of this document mailed to other parties or counsel;

WHEREAS, in February 2012 Trane, as a critical vendor, reached an agreement with the Debtors whereby, among other things, Trane agreed to release and withdraw its pending reclamation claim; and

WHEREAS, in February 2012 Trane received the agreed upon payment from the Debtors and now desires to confirm the withdrawal of its reclamation claim.

NOW, THEREFORE, Trane hereby states and confirms as follows:



1. Trane hereby releases and withdraws its pending reclamation demand asserted in the Debtors' bankruptcy case, including a release and withdrawal of all claims asserted under the Reclamation Demand Letter, the Written Reclamation Demand, and the Reclamation Notice of Objection of Trane US Inc.; and


2. Notwithstanding the above withdrawal of Trane's reclamation demand, Trane remains entitled to assert and pursue the general unsecured claim in the Debtors' bankruptcy proceedings for any portion of Trane's underlying pre-petition account balance that has not been paid or otherwise resolved; and

3. Trane consents to release and withdrawal of Trane's reclamation claim in the records of the Bankruptcy Court or in Debtors' records.

Date: March 13, 2012

WAGNER, FALCONER & JUDD, LTD.

By:



Mark O. Anderson (ID #149457)

Attorneys and Agents for Trane US Inc.

1700 IDS Center

80 South Eighth Street

Minneapolis, MN 55402-2113

Phone: (612) 339-1421

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FOR THE DISTRICT OF DELAWARE

FILED
MAR 16 2012

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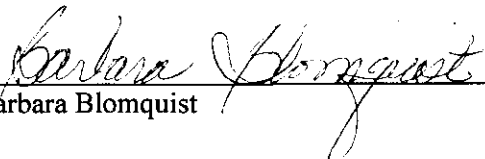
CERTIFICATE OF SERVICE

Barbara Blomquist, employed by WAGNER, FALCONER & JUDD, LTD., Attorneys at Law, with office address of 1700 IDS Center, 80 South Eighth Street, Minneapolis, Minnesota 55402, declares that on March 13, 2012, I served the attached Withdrawal of Reclamation Demand Submitted by Trane US Inc. on the parties herein set forth, by mailing to each of them a copy thereof, enclosed in an envelope, postage prepaid, and by depositing the same in the post office at Minneapolis, Minnesota, addressed to said party and addressed as follows:

Clerk, U.S. Bankruptcy Court 824 North Market Street, 3 rd Floor Wilmington, DE 19801	Dewey & LeBoeuf LLP Attn: Judy G.Z. Liu, Esq. Attn: Philip M. Abelson, Esq. 1301 Avenue of the Americas New York, NY 10019
Pachulski Stang Ziehl & Jones LLP Attn: Bruce Grohsgal, Esq. 919 North Market Street, 17 th Floor Wilmington, DE 19801	Paul Hastings LLP Attn: Luc A. Despina, Esq. 75 East 55 th Street New York, NY 10022
Paul Hastings LLP Attn: Robert E. Winter, Esq. 875 15 th Street NW Washington, DC 20005	Young Conaway Stargatt & Taylor LLP Attn: James L. Patton, Jr., Esq. 1000 West Street, 17 th Floor Wilmington, DE 19801
Davis Polk & Wardwell LLP Attn: Marshall S. Huebner, Esq. 450 Lexington Avenue New York, NY 10017	Office of U.S. Trustee District of Delaware Attn: David Klauder 844 King Street Suite 2207 Wilmington, DE 19801

and I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 13, 2012


Barbara Blomquist