

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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<i>In re</i>	: Chapter 11
	:
NEWPAGE CORPORATION, <i>et al.</i> ,	: Case No. 11-12804 (KG)
	:
Reorganized Debtors. ¹	: Jointly Administered
-----	x
MEADWESTVACO CORPORATION,	:
MEADWESTVACO VIRGINIA CORPORATION	:
and MW CUSTOM PAPERS LLC,	:
	:
Plaintiffs,	: Adv. Pro. No. 12-50775 (KG)
	:
- against -	:
	:
NEWPAGE CORPORATION, NEWPAGE ENERGY	:
SERVICES LLC, UPLAND RESOURCES, INC.,	:
RUMFORD PAPER CO., WICKLIFFE PAPER COMPANY	:
LLC and LUKE PAPER CO.,	:
	:
Defendants.	:
-----	x

**CERTIFICATION OF COUNSEL IN SUPPORT OF ORDER FURTHER
EXTENDING DEFENDANTS' TIME TO RESPOND TO AMENDED COMPLAINT**

The undersigned hereby counsel for the above-captioned reorganized debtors and defendants in the instant adversary proceeding hereby certifies that:

1. Plaintiffs MeadWestvaco Corporation, MeadWestvaco Virginia Corporation and MW Custom Papers LLC (the "Plaintiffs"), and defendants NewPage Corporation, NewPage Energy Services LLC, Upland Resources, Inc., Rumford Paper Co., Wickliffe Paper Company LLC and Luke Paper Co. (the "Defendants") have entered into a *Stipulation to Further Extend Defendants' Time to Respond to Amended Complaint* (the "Stipulation"), pursuant to which the Plaintiffs have agreed to an extension of time for the

¹ The Reorganized Debtors are: Chillicothe Paper Inc. (6154), Escanaba Paper Company (5598), Luke Paper Company (6265), NewPage Consolidated Papers Inc. (8330), NewPage Corporation (6156), NewPage Energy Services LLC (1838), NewPage Wisconsin System Inc. (3332), Rumford Paper Company (0427), Upland Resources, Inc. (2996), and Wickliffe Paper Company LLC (8293). The Reorganized Debtors' corporate headquarters is located at 8540 Gander Creek Drive, Miamisburg, OH 45319.
DOCS_DE:183227.7 59998/001



Defendants to respond to the Plaintiffs' *Amended Complaint* to June 17, 2013, and to schedule the initial scheduling conference for this matter to July 11, 2013, at 11:00 a.m.

2. A copy of the Stipulation is annexed hereto as Exhibit 1.

3. The Defendants therefore respectfully requests that the Court enter at its convenience the [Proposed] *Order Further Extending Further Defendants' Time to Respond to Amended Complaint* (the "Proposed Order") appended to the Stipulation as Exhibit A, granting the Defendants until June 17, 2013, to respond to the *Amended Complaint*.

4. Counsel for the Defendants is available upon request should the Court have any questions or concerns with respect to the foregoing or the Proposed Order.

Dated: May 13, 2013

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Co-Attorneys for the Reorganized Debtors

EXHIBIT 1

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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<i>In re</i>	:	Chapter 11
	:	
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	:	
Debtors. ¹	:	Jointly Administered
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MEADWESTVACO CORPORATION,	:	
MEADWESTVACO VIRGINIA CORPORATION	:	
and MW CUSTOM PAPERS LLC,	:	
	:	
Plaintiffs,	:	Adv. Pro. No. 12-50775 (KG)
	:	
- against -	:	
	:	
NEWPAGE CORPORATION, NEWPAGE ENERGY	:	
SERVICES LLC, UPLAND RESOURCES, INC.,	:	
RUMFORD PAPER CO., WICKLIFFE PAPER COMPANY	:	
LLC and LUKE PAPER CO.,	:	
	:	
Defendants.	:	
-----		x

**STIPULATION TO FURTHER EXTEND
DEFENDANTS' TIME TO RESPOND TO AMENDED COMPLAINT**

Plaintiffs MeadWestvaco Corporation, MeadWestvaco Virginia Corporation and MW Custom Papers LLC (the "Plaintiffs"), and defendants NewPage Corporation, NewPage Energy Services LLC, Upland Resources, Inc., Rumford Paper Co., Wickliffe Paper Company LLC and Luke Paper Co. (the "Defendants"), herein represent and stipulate as follows:

¹ The Debtors in these chapter 11 cases, and each Debtor's federal tax identification number, are: Chillicothe Paper Inc. (6154), Escanaba Paper Company (5598), Luke Paper Company (6265), NewPage Canadian Sales LLC (5384), NewPage Consolidated Papers Inc. (8330), NewPage Corporation (6156), NewPage Energy Services LLC (1838), NewPage Group Inc. (2465), NewPage Holding Corporation (6158), NewPage Port Hawkesbury Holding LLC (8330), NewPage Wisconsin System Inc. (3332), Rumford Paper Company (0427), Upland Resources, Inc. (2996), and Wickliffe Paper Company LLC (8293). The Debtors' corporate headquarters is located at 8540 Gander Creek Drive, Miamisburg, OH 45342.

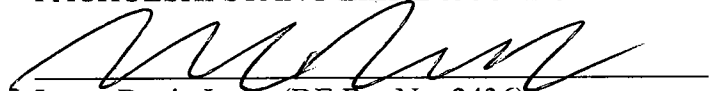
1. On June 21, 2012, the Plaintiffs filed a complaint seeking declaratory relief and breach of contract damages (the "Complaint") in the above-captioned adversary proceeding. On September 5, 2012, the Plaintiffs filed an amended complaint seeking declaratory relief and an injunction (the "Amended Complaint"). On September 12, 2012, the Plaintiffs served the Amended Complaint. On April 11, 2013, the *Order Further Extending Defendants' Time to Respond to Amended Complaint* [Docket No. 41] extended the Defendants' time to respond to the Amended Complaint to May 15, 2013.

2. The Plaintiffs have consented to a further extension of time for the Defendants to answer or otherwise respond to the Amended Complaint to June 17, 2013. The Defendants request the initial scheduling conference be rescheduled for July 11, 2013 at 11:00 am.

3. The parties therefore request an order, substantially in the form attached hereto as Exhibit A, extending the Defendants' time to answer or otherwise respond to the Amended Complaint accordingly.

Dated: May 13, 2013

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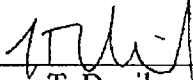
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Co-Attorneys for the Plaintiffs

EXHIBIT A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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MEADWESTVACO VIRGINIA CORPORATION	:	
and MW CUSTOM PAPERS LLC,	:	
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Plaintiffs,	:	Adv. Pro. No. 12-50775 (KG)
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SERVICES LLC, UPLAND RESOURCES, INC.,	:	
RUMFORD PAPER CO., WICKLIFFE PAPER COMPANY	:	
LLC and LUKE PAPER CO.,	:	
	:	
Defendants.	:	
-----		x

**ORDER FURTHER EXTENDING DEFENDANTS'
TIME TO RESPOND TO AMENDED COMPLAINT**

Pursuant to stipulation between the parties and good cause appearing therefor,

IT IS ORDERED as follows:

The time for defendants NewPage Corporation, NewPage Energy Services LLC, Upland Resources, Inc., Rumford Paper Co., Wickliffe Paper Company LLC and Luke Paper Co. to answer or otherwise respond to the plaintiff's amended complaint filed September 5, 2012 is

¹ The Debtors in these chapter 11 cases, and each Debtor's federal tax identification number, are: Chillicothe Paper Inc. (6154), Escanaba Paper Company (5598), Luke Paper Company (6265), NewPage Canadian Sales LLC (5384), NewPage Consolidated Papers Inc. (8330), NewPage Corporation (6156), NewPage Energy Services LLC (1838), NewPage Group Inc. (2465), NewPage Holding Corporation (6158), NewPage Port Hawkesbury Holding LLC (8330), NewPage Wisconsin System Inc. (3332), Rumford Paper Company (0427), Upland Resources, Inc. (2996), and Wickliffe Paper Company LLC (8293). The Debtors' corporate headquarters is located at 8540 Gander Creek Drive, Miamisburg, OH 45342.

extended to June 17, 2013; and the initial scheduling conference is rescheduled for July 11, 2013 at 11:00 am.

Dated: May __, 2013

Honorable Kevin Gross
Chief Judge, United States Bankruptcy Court