

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

In re:) Case No. 16-50058
)
SEPCO CORPORATION,) Chapter 11
)
Debtor.) Judge Alan M. Koschik

DEBTOR'S NOTICE OF PUBLICATION
(RELATED DOCKET NOS. 536 AND 527)

Attached as Exhibit A is a copy of a "Legal Affidavit" which confirms that on March 6, 2019, notice was published in *The Plain Dealer* regarding the:

- *Disclosure Statement With Respect to the First Amended Plan of Reorganization for Sepco Corporation Under Chapter 11 of the Bankruptcy Code; and*
- *Motion of the Debtor for an Order Approving (I) the Disclosure Statement; (II) the Solicitation and Voting Procedures; (III) Forms of Ballots; (IV) Deadlines and Procedures to File Objections to the Disclosure Statement and the Plan; (V) a Hearing Date to Consider Confirmation of the Plan; and (VI) the Form, Scope, and Manner of Notice of the Plan and Confirmation Hearing.*

Respectfully submitted,

/s/ Jeffrey C. Toole

HARRY W. GREENFIELD (0003839)
greenfield@buckleyking.com
JEFFREY C. TOOLE (0064688)
toole@buckleyking.com
BUCKLEY KING LPA
1400 Fifth Third Center
600 Superior Avenue, East
Cleveland, Ohio 44114
Telephone: (216) 363-1400
Facsimile: (216) 579-1020

Attorneys for Sepco Corporation,
Debtor and Debtor-in-Possession

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 15, 2019, copies of the *Debtor's Notice of Publication (Related Docket Nos. 536 and 527)* are being served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

- Kate M. Bradley kbradley@brouse.com, tpalcic@brouse.com;mmiller@brouse.com
- Joel K. Dayton jdayton@bmsa.com, lnodo@ecf.courtdrive.com
- William R. Hanlon whanlon@goodwinlaw.com
- Chrysanthe E. Vassiles cvassiles@bmsa.com, wpoling@ecf.courtdrive.com;cvassiles@ecf.courtdrive.com
- Richard M. Wyner rwyner@goodwinlaw.com
- Eric Goldstein egoldstein@goodwin.com, bankruptcy@goodwin.com;bankruptcyparalegal@goodwin.com
- Harry W. Greenfield greenfield@buckleyking.com, young@buckleyking.com; toole@buckleyking.com
- Mark Merklin mmerklin@brouse.com, tpalcic@brouse.com
- Tiiara N. A. Patton tiara.patton@usdoj.gov
- Mark David Plevin mplevin@crowell.com
- United States Trustee (Registered address)@usdoj.gov
- Tacie Hashida Yoon tyoon@crowell.com
- Kevin Michael Young kevin.young@tuckerellis.com, carol.parise@tuckerellis.com

/s/ Jeffrey C. Toole
JEFFREY C. TOOLE

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EXHIBIT A

AD#: 0009057156

State of Ohio,) ss

County of Cuyahoga)

Sally Weist being duly sworn, deposes that he/she is principal clerk of Advance Ohio; that The Plain Dealer is a public newspaper published in the city of Cleveland, with general circulation in Cuyahoga, Ashtabula, Geauga, Lake, Lorain, Medina, Portage, Summit and Trumbull counties, and this notice is an accurate and true copy of this notice as printed in said newspaper, was printed and published in the regular edition and issue of said newspaper on the following date(s):

The Plain Dealer 03/06/2019

Sally Weist

Principal Clerk of the Publisher

Sworn to and subscribed before me this 7th day of March 2019

Rosemarie A. Costo

Notary Public



Rosemarie A. Costo
NOTARY PUBLIC - OHIO
Cuyahoga
MY COMMISSION EXPIRES 11/26/2023

**NOTICE IN RE: SEPCO CORPORATION,
CASE NO. 16-30058 (N.D. OHIO BANKRUPTCY COURT)
NOTICE OF FILING DEBTOR'S DISCLOSURE STATEMENT
AND VOTING AND SOLICITATION PROCEDURES**

PLEASE TAKE NOTICE that, on March 1, 2019, Sepco Corporation ("Debtor") filed the Disclosure Statement With Respect to the First Amended Plan of Reorganization for Sepco Corporation Under Chapter 11 of the Bankruptcy Code (the "Proposed Disclosure Statement"), and on February 11, 2019, the Debtor filed the Motion of the Debtor for an Order Approving (I) the Disclosure Statement; (II) the Solicitation and Voting Procedures; (III) Forms of Ballots; (IV) Deadlines and Procedures to File Objections to the Disclosure Statement and the Plan; (V) a Hearing Date to Consider Confirmation of the Plan; and (VI) the Form, Scope, and Manner of Notice of the Plan and Confirmation Hearing (the "Voting and Solicitation Procedures Motion") with the United States Bankruptcy Court for the Northern District of Ohio (the "Bankruptcy Court").

PLEASE TAKE FURTHER NOTICE that the Debtor reserves the right to further amend, supplement, or otherwise modify the Proposed Disclosure Statement and the voting and solicitation procedures requested in the Voting and Solicitation Procedures Motion.

PLEASE TAKE FURTHER NOTICE that a hearing (the "Disclosure Statement Hearing") will be held on **April 4, 2019, at 10:00 a.m.**, prevailing Eastern Time before the Honorable Alan M. Koschik at the John F. Selberling Federal Building & U.S. Courthouse, 2 South Main Street, Akron, Ohio 44308, Courtroom No. 260, to consider the entry of an order determining, among other things, that the Proposed Disclosure Statement contains "adequate information" within the meaning ascribed to such term in section 1125 of title 11 of the United States Code, approving the Proposed Disclosure Statement, and granting the Voting and Solicitation Procedures Motion. Please be advised that the Disclosure Statement Hearing may be continued from time to time by the Bankruptcy Court or the Debtor without further notice other than by such adjournment being announced in open court or by a notice of adjournment filed with the Bankruptcy Court and served on the list of parties entitled to notice.

Any objections to the Proposed Disclosure Statement or to the Voting and Solicitation Procedures Motion must be filed with the Clerk of the Court, United States Bankruptcy Court for the Northern District of Ohio, John F. Selberling Federal Building & U.S. Courthouse, 455 U.S. Courthouse, 2 South Main Street, Akron, Ohio 44308, not later than **March 29, 2019** (the "Disclosure Statement Objection Deadline").

Objections to the Proposed Disclosure Statement or to the Voting and Solicitation Procedures Motion, if any, must (a) be in writing, (b) comply with the Bankruptcy Code, the Bankruptcy Rules and the Local Rules, (c) state the name and address of the objecting party and the amount and nature of the claim or security interest beneficially owned by such entity; (d) state with particularity the legal and factual basis for such objections, and, if applicable, a proposed modification to the Proposed Disclosure Statement or to the proposed voting and solicitation procedures that would resolve such objection; and (e) be filed with the Clerk of the Court and served on the following parties or to be notified:

also set upon the following persons so as to be *exclusively* received by the Disclosure Statement Objection Deadline.

- the Office of the United States Trustee for Region 9, Howard M. Metzbaum U.S. Courthouse, 201 Superior Avenue, East Suite 441, Cleveland, Ohio 44114, Attn: Tiara Patton;
- counsel to the Debtor, Buckley King LPA, 1400 Fifth Third Center, 600 Superior Avenue, East, Cleveland, Ohio 44114, Attn: Jeffrey C. Toole;
- counsel to the Committee, Caplin & Drysdale, Chartered, One Thomas Circle, N.W., Suite 1100, Washington, D.C. 20005, Attn: Kevin C. Maday, and Brouse McDowell LLP, 388 S. Main Street, Suite 300, Akron, Ohio 44311, Attn: Kate M. Bradley;
- counsel to the Future Claimants' Representative, Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, DE 19801, Attn: Edwin J. Harron, and Black, McCuskey Souers & Arbaugh, 220 Market Avenue S., Suite 1000, Canton, Ohio 44702, Attn: Joel K. Dayton; and
- counsel to the Debtor's Affiliates (defined in the Plan), Goodwin Procter LLP, 901 New York Avenue, NW, Washington, DC 20001, Attn: William R. Harlon and Richard M. Wynec.

The Proposed Disclosure Statement can be accessed on the internet at <http://www.kcdlc.net/seco>, or a copy of the Proposed Disclosure Statement may be requested, in writing, from counsel for the Debtor: Buckley King LPA, 1400 Fifth Third Center, 600 Superior Avenue, East, Cleveland, Ohio 44114, Attn: Jeffrey C. Toole.

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