

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

TAYLOR-WHARTON  
INTERNATIONAL LLC<sup>1</sup>, et al.

Debtors.

Chapter 11

Case No. 09-14089 (BLS)  
(Jointly Administered)

**NOTICE OF AGENDA OF MATTERS SCHEDULED  
FOR HEARING ON FEBRUARY 16, 2010 AT 10:30 A.M. (EASTERN)**

**UNCONTESTED MATTERS WITH CERTIFICATES OF NO OBJECTION:**

1. Application of Debtors and Debtors in Possession for an Order Pursuant to 11 U.S.C. §§ 105(a) and 363(b) Authorizing the Employment and Retention of Kiski Consulting LLC and Bill Corbin as Chief Executive Officer and Chairman *Nunc Pro Tunc* to December 1, 2009 (Filed on December 28, 2009; Docket No. 109)

**Related Documents:**

- a. Certificate of No Objection to Application of Debtors and Debtors in Possession for an Order Pursuant to 11 U.S.C. §§ 105(a) and 363(b) Authorizing the Employment and Retention of Kiski Consulting LLC and Bill Corbin as Chief Executive Officer and Chairman *Nunc Pro Tunc* to December 1, 2009 (Filed on February 9; Docket No. 197)
- b. Proposed Form of Order.

**Responses Received:** None.

**Response Deadline:** February 1, 2010 at 4:00 p.m. (Eastern).

**Status:** A certificate of no objection has been filed in connection with this matter. Except as may be necessary to address any of the Court's questions or concerns, no hearing is required on this matter.

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number are: Taylor-Wharton International LLC (1577); TWI-Holding LLC (8154); Taylor-Wharton Intermediate Holdings LLC (6890); Alpha One Inc. (1392); Beta Two Inc. (1408); Gamma Three Inc. (1367); Delta Four Inc. (1320); Epsilon Five Inc. (1344); TW Cryogenics LLC (1713); TW Cylinders LLC (1665); Sherwood Valve LLC (1781); American Welding & Tank LLC (1945); and TW Express LLC (6414) with a principal place of business at 4817 Old Gettysburg Road, Mechanicsburg, Pennsylvania 17055.

## **CONTINUING MATTERS NOT GOING FORWARD:**

2. Confirmation of Joint Chapter 11 Plan of Reorganization Dated as of December 4, 2009 (Filed on December 4, 2009; Docket No. 77)

### Related Documents:

- a. Disclosure Statement in Support of Joint Plan of Reorganization of Taylor-Wharton International LLC and its Affiliated Debtors Under Chapter 11 of the United States Bankruptcy Code (Filed on December 4, 2009; Docket No. 78)
- b. Certification of Counsel Regarding Submission of New Exhibit 6 to Revised Disclosure statement in Support of Joint Plan of Reorganization of Taylor Wharton International LLC and its Affiliated Debtors Under Chapter 11 of the United States Bankruptcy Code (Filed on January 11, 2010; Docket No. 151)
- c. Order: (i) Approving Disclosure Statement; (ii) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject Their Joint Plan or Reorganization, including: (a) Approving the Form and Manner of Distribution of Solicitation Packages, (b) Approving the Form and Manner of Notice of the Confirmation Hearing, (c) Establishing a Record Date and Approving Procedures for Distribution of Solicitation Packages, (d) Approving Forms of Ballots, (e) Establishing the Deadline for Receipt of Ballots, and (f) Approving the Procedure for Vote Tabulations; (iii) Establishing the Deadline and Procedures for Filing Objections to: (a) Confirmation of the Plan and (b) Proposed Cure Amounts Related to Contracts and Leases Assumed Under the Plan; and (iv) Granting Related Relief (Entered on January 11, 2010; Docket No. 152)
- d. Affidavit/Declaration of Paul V. Kinealy with respect to Service of Notice of Confirmation Hearing and Publication in (a) *The Wall Street Journal*, (b) *The News-Messenger/Outlook*, (c) *Observer-Reporter*, (d) *The Patriot News*, (e) *The Salt Lake Tribune*, (f) *Crossville Chronicle*, (g) *The Huntsville Times*, (h) *Mobile Press-Register*, (i) *The Niagra Gazette*, (j) *The Press Sentinel Newspaper*, and (k) *Sun Post Herald* (Filed on February 11, 2010; Docket No. 203)

### Responses Received:

- e. Limited Objection of Worthington Cylinder Corporation to Confirmation of Joint Plan of Reorganization of Taylor-Wharton International LLC and Its Affiliated Debtors Under Chapter 11 of The United States Bankruptcy Code (Filed on February 8, 2010; Docket No. 193)
- f. Objection to Confirmation of Joint Plan of Reorganization filed by Stephen Trigo (Filed on February 8, 2010; Docket No. 194)
- g. Objection to Confirmation of Plan filed by United States Trustee (filed on December 9, 2010; Docket No. 196)

- h. Objection of Harsco Corporation to Joint Plan of Reorganization of Taylor-Wharton International LLC and its Affiliated Debtors Under Chapter 11 of the United States Bankruptcy Code (Filed on February 9, 2009; Docket No. 199)

Response Deadline: February 9, 2009 at 4:00 p.m. (Eastern)

Status: The Debtors will provide the Court with a status report with respect to their Joint Plan of Reorganization and will request an adjournment of the hearing on confirmation of their Plan until mid-April, 2010.

### **MATTERS GOING FORWARD**

3. Motion of Debtors and Debtors in Possession for an Order Pursuant to 11 U.S.C. §§ 105(a) and 365(a) and Rule 6006 of The Federal Rules of Bankruptcy Procedure Authorizing the Rejection of Executory Contractual Agreements with Harsco Corporation and an Unexpired Lease of Non-Residential Real Property, *Nunc Pro Tunc* to the Date Hereof (Filed on December 23, 2009; Docket No. 104)

Related Documents: None.

Responses Received:

- a. Objection of Harsco Corporation to Motion of Debtors for an Order Authorizing the Rejection of Certain Executory Contracts [Docket No. 104] (Filed on February 1, 2010; Docket No. 185)

Response Deadline: February 1, 2010 at 4:00 p.m. (Eastern).

Status: This matter is going forward. Harsco Corporation has granted the Debtors' request for an extension of time to file a Reply to the Objection to this Motion until 5:00 PM EST on February 12, 2010.

4. Motion of Harsco Corporation for an Order Temporarily Allowing Its Claims for Voting Purposes Pursuant to Rule 3018(a) of The Bankruptcy Rules (Filed on February 1, 2010; Docket No. 186)

Related Documents: None.

Responses Received:

- a. Debtors' Objection to the Motion of Harsco Corporation for an Order Temporarily Allowing Its Claims for Voting Purposes Pursuant to Rule 3018(A) of The Bankruptcy Rules (Filed on February 9, 2010; Docket No. 198)

Response Deadline: February 9, 2010 at 4:00 p.m. (Eastern).

Status: This matter is going forward.

Dated: February 11, 2010  
Wilmington, Delaware

Respectfully submitted,

REED SMITH LLP

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