

**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

Hearing Date: May 25, 2010 at 11:30 a.m. (ET)  
Objection Deadline: May 19, 2010 at 4:00 p.m. (ET)  
Reply Deadline: May 21, 2010 at 4:00 p.m. (ET)

Re: Docket No. 303

**NOTICE OF MOTION REGARDING MOTION FOR ORDER  
UNDER 11 U.S.C. § 1113(c) AUTHORIZING REJECTION OF  
COLLECTIVE BARGAINING AGREEMENTS**

**PLEASE TAKE NOTICE** that on May 7, 2010, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed the Motion for an Order Pursuant to 11 U.S.C. § 1113(c) Authorizing Rejection of Collective Bargaining Agreements (the “Motion”).

**PLEASE TAKE FURTHER NOTICE** that any objections to the Motion must be filed on or before **May 19, 2010 at 4:00 p.m. (ET)** (the “Objection Deadline”) with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801. At the same time, you must serve a copy of the objection upon the undersigned counsel to the Debtors so as to be received on or before the Objection Deadline.

**PLEASE TAKE FURTHER NOTICE** that any reply to the Motion must be filed on or before **May 21, 2010 at 4:00 p.m. (ET)** (the “Reply Deadline”) with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801. At the same time, you must serve a copy of the objection upon the undersigned counsel to the Debtors so as to be received on or before the Reply Deadline.

**PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE MOTION WILL BE HELD ON MAY 25, 2010 AT 11:30 A.M. (ET), BEFORE THE HONORABLE BRENDAN L. SHANNON AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 6TH FLOOR, COURTROOM NO. 1, WILMINGTON, DELAWARE 19801.**

<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). Each of the Debtors has a principal place of business at 4817 Old Gettysburg Road, Mechanicsburg, Pennsylvania 17055.

**PLEASE TAKE FURTHER NOTICE** that if you fail to respond in accordance with this notice, the Court may grant the relief requested in the Motion without further notice or hearing.

Dated: May 13, 2010  
Wilmington, Delaware

Respectfully submitted,

REED SMITH LLP

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LLC, *et al.*, Debtors and Debtors-in-  
Possession