

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

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In re : Chapter 11  
: :  
RathGibson, Inc., et al.,<sup>1</sup> : Case No. 09-12452 (CSS)  
: :  
Debtors. : Jointly Administered  
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**AMENDED<sup>2</sup> NOTICE OF AGENDA OF MATTERS SCHEDULED  
FOR HEARING ON AUGUST 31, 2009 AT 12:30 P.M.**

**UNCONTESTED MATTERS GOING FORWARD**

1. Debtors' Motion for Orders: (I) Authorizing Debtors to (A) Pay Prepetition Employee Wages, Salaries and Other Compensation, Prepetition Employee Business Expenses, and other Miscellaneous Employee Expenses and Employee Benefits; and (B) Continue Employee Benefit Programs; (II) Authorizing the Debtors to Satisfy Certain Bonus Obligations to Employees; and (III) Granting Related Relief [Docket No. 8; Filed 7/13/09]

Objection Deadline: August 4, 2009 at 4:00 p.m.

Related Documents:

- a) Order: (I) Authorizing Debtors to Pay: (A) Prepetition Employee Wages, Salaries and Other Compensation; (B) Prepetition Employee Business Expenses; and (C) Other Miscellaneous Employee Expenses and Employee Benefits; (II) Authorizing Debtors to Continue Employee Benefit Programs; (III) Scheduling a Hearing on Entry of an Order Authorizing the Debtors to Satisfy Certain Bonus Obligations to Employees; and (IV) Granting Related Relief [Docket No. 54; Filed 7/14/09]
- b) Notice of Entry of Order and Hearing to Consider Entry of Order Authorizing the Debtors to Satisfy Certain Bonus Obligations to Employees [Docket No. 59; Filed 7/15/09]
- c) **Declaration of Michael Schwartz in Support of Debtors' Motion for an Order Authorizing the Debtors to Satisfy Certain Bonus Obligations to Employees [Docket No. 221; Filed 8/27/09]**

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<sup>1</sup> The last four digits of the taxpayer identification numbers of the Debtors follow in parentheses: (i) Greenville Tube Company (2689); (ii) RathGibson, Inc. (3283); (iii) RG Tube Holdings LLC (4080); and (iv) RGCH Holdings Corp. (9683). The Debtors' executive headquarters' address is 475 Half Day Road, Suite 210, Lincolnshire, Illinois 60069.

<sup>2</sup> **Amendments are in bold.**

Responses Filed: None as of the filing of this Agenda.

Status: The relief requested by the Motion, other than the Bonus Obligations, was approved pursuant to Item (a). With respect to the Bonus Obligations, this matter is going forward.

### **CONTESTED MATTERS GOING FORWARD**

2. Disclosure Statement for Joint Chapter 11 Plan for RathGibson, Inc. and Greenville Tube Company [Docket No. 33; Filed 7/13/09]

Objection Deadline: August 24, 2009 at 4:00 p.m.

Related Documents:

- a) Joint Chapter 11 Plan for RathGibson, Inc. and Greenville Tube Company [Docket No. 32; Filed 7/13/09]
- b) Notice of Hearing to Consider Adequacy of Disclosure Statement [Docket No. 76; Filed 7/21/09]
- c) Debtors' Motion for Order (I) Approving Disclosure Statement; (II) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject Plan, Including (A) Approving Form and Manner of Solicitation Packages, (B) Approving Form and Manner of Notice of Confirmation Hearing, (C) Establishing Record Date and Approving Procedures for Distribution of Solicitation Packages, (D) Approving Form of Ballots, (E) Establishing Deadline for Receipt of Ballots, and (F) Approving Procedures for Vote Tabulations; (III) Establishing Deadline and Procedures for Filing Objections to Confirmation of Plan; (IV) Approving Rights Offering Procedures, Entry into and Performance Under Backstop Stock Purchase Agreement, and Authorizing Payment of Fees and Expenses in Connection Therewith; and (V) Granting Related Relief [D.I. 118, Filed 7/31/09]
- d) Notice of Filing Exhibits Relating to Docket Item 118 [D.I. 206; 8/21/09]
- e) Notice of Filing Amended Exhibits Relating to Docket Item 118 [D.I. 213; 8/25/09]
- ee) **Notice of Filing a Blackline Disclosure Statement for First Amended Joint Chapter 11 Plan for RathGibson, Inc. and Greenville Tube Company [D.I. 231; 8/28/09]**

Responses Filed:

- f) Statement of the Official Committee of Unsecured Creditors Regarding the Disclosure Statement for Joint Chapter 11 Plan for RathGibson, Inc. and Greenville Tube Company [D.I. 212; 8/25/09]

Status: The U.S. Trustee has raised certain informal issues to the Solicitation Motion and Plan. The Debtors and U.S. Trustee have resolved the issues with respect to the Solicitation Motion by revisions to the Order, and the issues with respect to the Plan are being treated as confirmation objections and will be addressed by the Debtors in connection with the confirmation. The Debtors are also working with the Committee to address its certain informal issues. This matter is going forward.

- 3. Application for Order Authorizing: (I) Employment and Retention of Jefferies and Company, Inc. as Financial Advisor and Investment Banker to the Debtors; and (II) Waiver of Certain Information Requirements of Local rule 2016-2 [Docket No. 29; Filed 7/13/09]

Objection Deadline: August 4, 2009 at 4:00 p.m.; extended for the Committee to file a written response to August 24, 2009 at 5:00 p.m.

Related Documents:

- a) Omnibus Notice of Motions and Hearing Thereon [Docket No. 57; Filed 7/15/09]
- b) Debtors' Motion for Order Approving Addendum to Engagement Letter Between the Debtors and Jefferies and Company, Inc. [Docket No. 145; Filed 8/10/09]

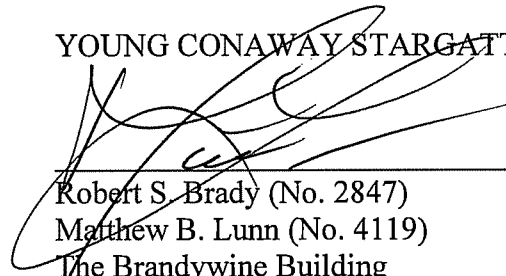
Responses Filed:

- c) Informal response of United States Trustee
- d) Informal response of Official Committee of Unsecured Creditors

Status: Items (c) and (d) have been resolved. The Debtors anticipate submitting revised orders prior to or at the hearing. This matter is going forward.

Dated: Wilmington, Delaware  
August 28, 2009

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