

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

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In re : Chapter 11
RathGibson, Inc., et al.,¹ : Case No. 09-12452 (CSS)
Debtors. : Jointly Administered
 : **Objection Deadline: March 18, 2010 at 4:00 p.m. (ET)**
 : **Hearing Date: March 25, 2010 at 10:00 a.m. (ET)**
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**DEBTORS' FIFTH OMNIBUS (SUBSTANTIVE) OBJECTION
TO CLAIMS PURSUANT TO SECTION 502(b) OF THE BANKRUPTCY CODE,
BANKRUPTCY RULES 3003 AND 3007, AND LOCAL RULE 3007-1**

The above-captioned debtors and debtors in possession (the “Debtors”) hereby object (the “Objection”) to each of the claims and interests (the “Disputed Claims”) listed on Exhibit A to the proposed form of order (the “Proposed Order”) attached hereto as Exhibit 2, pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rules 3003 and 3007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 3007-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”) and request the entry of an order disallowing and expunging in full such Disputed Claims as described herein. In support of this Objection, the Debtors rely on the Declaration of Jon M. Smith in Support of the Debtors’ Fifth Omnibus (Substantive) Objection to Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1, attached hereto as Exhibit 1. In further support, the Debtors respectfully represent as follows:

¹ 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.

JURISDICTION

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A). Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicates for the relief sought herein are section 502(b) of the Bankruptcy Code and Bankruptcy Rules 3003 and 3007.

BACKGROUND

2. On July 13, 2009 (the "Petition Date"), the Debtors each filed a voluntary petition with this Court for relief under chapter 11 of the Bankruptcy Code. The Debtors are continuing in the possession of their respective properties and the management of their respective businesses as debtors in possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.

3. The Debtors' cases have been consolidated for procedural purposes only and are being jointly administered pursuant to an order of this Court.

4. On July 22, 2009, the United States Trustee for the District of Delaware (the "U.S. Trustee") appointed an official committee of unsecured creditors (the "Creditors' Committee"). As of the date hereof, no request has been made for the appointment of a trustee or examiner.

5. The events leading up to the Petition Date are set forth in the *Declaration of Jon M. Smith in Support of Chapter 11 Petitions and First Day Pleadings*, which was filed with the Court on the Petition Date [Docket No. 3].

6. On the Petition Date, certain Debtors, RathGibson, Inc. and Greenville Tube Company, filed a joint proposed plan of reorganization [Docket No. 32] (as may be amended or modified, the "Plan") and a related disclosure statement (the "Disclosure

Statement”). At a hearing held on August 31, 2009, this Court approved the Disclosure Statement.

7. Following the solicitation of votes in respect of the Plan, the Debtors determined it was appropriate to amend the Plan to, among other things, provide for the inclusion of certain Debtors, RG Tube Holdings LLC and RGCH Holdings Corp., in the Plan and to implement a more tax efficient restructuring. Accordingly, the Debtors are in the process of documenting an amended Plan and related disclosure statement and anticipate filing such amended Plan and disclosure documents shortly, with a view towards emerging from chapter 11 during the second quarter of 2010.

8. By order dated December 8, 2009 [Docket No. 442], the Court granted the Debtors’ request to: (i) extend Debtors’ exclusive right to file a chapter 11 plan or plans through and including February 23, 2010; and (ii) extend the period in which the Debtors have the exclusive right to solicit acceptances of such plan(s) through and including April 28, 2010. On February 22, 2010, the Debtors filed a motion to further extend their exclusive right to file a chapter 11 plan or plans and further extend the right to solicit acceptances of such plan(s).

BAR DATE AND PROOFS OF CLAIM

9. On July 14, 2009, this Court entered an order [Docket No. 56] appointing The Garden City Group, Inc. (“GCG”) as claims and noticing agent in these chapter 11 cases. GCG is authorized to maintain (i) all proofs of claim filed against the Debtors and (ii) an official claims register by docketing all proofs of claim in a claims database containing, inter alia, information regarding the name and address of each claimant, the date the proof of claim was received by GCG, the claim number assigned to the proof of claim, and the asserted amount and classification of the claim.

10. On July 14, 2009, this Court also entered an order (the “Bar Date Order”) pursuant to which September 2, 2009 at 4:00 p.m. (ET) (the “General Bar Date”) was established as the final date and time for filing proofs of claim against the Debtors’ estates on account of claims arising, or deemed to have arisen pursuant to section 501(d) of the Bankruptcy Code, prior to the Petition Date and approving the form and manner of notice of the General Bar Date. Therein, the Court also established January 11, 2010 at 4:00 p.m. (ET) (the “Government Bar Date”) as the final date and time for any governmental unit to file proofs of claims against the Debtors’ estates on account of claims (whether secured, unsecured priority or unsecured non-priority) that arose prior to or on the Petition Date.

11. Additionally, pursuant to the Bar Date Order, any entity asserting a claim (a “Rejection Damages Claim”) against the Debtors’ estates in connection with the Debtors’ rejection of an executory contract and/or unexpired lease under section 365 of the Bankruptcy Code prior to the confirmation of a chapter 11 plan was required to file a proof of claim on or before the later of (i) the General Bar Date or (ii) 4:00 p.m. (prevailing Eastern Time) on the date that is thirty (30) days after entry of an order approving the rejection of such executory contract and/or unexpired lease pursuant to which the entity asserting the Rejection Damages Claim is a party (the “Rejection Bar Date,” and together with the General Bar Date and the Government Bar Date, the “Bar Date”).

12. Pursuant to the Bar Date Order, actual notice of the Bar Date was sent to (i) all known entities holding potential prepetition claims and their counsel (if known); (ii) all parties that have requested notice in these cases; (iii) all equity security holders; (iv) the United States Trustee; (v) the Securities and Exchange Commission; and (vi) all taxing authorities for the jurisdictions in which the Debtors do business. In addition, notice of the Bar Date was

published in the national edition of The New York Times on August 10, 2009. Affidavits of service and publication confirming such actual and publication notice of the Bar Date have been filed with this Court [Docket Nos. 128 and 197].

RELIEF REQUESTED

13. By this Objection, the Debtors seek entry of an order, pursuant to section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1, disallowing and expunging in full the Disputed Claims listed in Exhibit A to the Proposed Order for the reasons set forth below. This Objection complies in all respects with Local Rule 3007-1.

A. No Liability Claims

14. After reconciling each of the Disputed Claims and supporting materials against their books and records, which the Debtors believe to be accurate, the Debtors have determined that they are not liable with respect to the claims identified in Exhibit A to the Proposed Order (the “No Liability Claims”). Upon review of the No Liability Claims, the Debtors cannot justify these claims as valid. Consequently, the Debtors believe the No Liability Claims identified in Exhibit A should be disallowed and expunged in their entirety. Failure to disallow the No Liability Claims will result in the applicable claimants receiving an unwarranted recovery against the Debtors’ estates, to the detriment of creditors in these cases. Accordingly, the Debtors hereby object to the No Liability Claims and request entry of an order disallowing and expunging in full each of the No Liability Claims identified in Exhibit A.

RESERVATION OF RIGHTS

15. The Debtors expressly reserve the right to amend, modify or supplement this Objection, and to file additional objections to any claims filed in these chapter 11 cases including, without limitation, the claims that are the subject of this Objection.

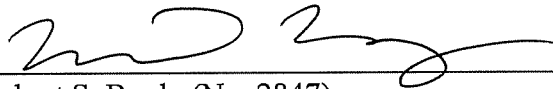
NOTICE

16. The Debtors have provided notice of this Objection to (i) the Office of the United States Trustee; (ii) the holders of the Disputed Claims; (iii) counsel to the Creditors' Committee; (iv) counsel to the agent for the Prepetition Secured Lenders; (v) counsel for the Ad Hoc Committee of RathGibson Senior Notes and DIP Lenders; and (vi) those parties who have requested notice pursuant to Bankruptcy Rule 2002, in accordance with Del. Bankr. LR 2002-1(b).

WHEREFORE, the Debtors respectfully request entry of an order, substantially in the form attached hereto as Exhibit 2, sustaining this Objection in all respects and granting such other and further relief as the Court deems just and proper.

Dated: Wilmington, Delaware
February 23, 2010

YOUNG CONAWAY STARGATT & TAYLOR, LLP



Robert S. Brady (No. 2847)
Matthew B. Lunn (No. 4119)
Michael S. Neiburg (No. 5275)
The Brandywine Building
1000 West Street, 17th Floor
Wilmington, Delaware 19801
(302) 571-6600

-and-

WILLKIE FARR & GALLAGHER LLP
Paul V. Shalhoub
Robin Spigel
Andrew Sorkin
787 Seventh Avenue
New York, New York 10019
(212) 728-8000

Co-Counsel for the Debtors and
Debtors in Possession

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

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In re : Chapter 11
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RathGibson, Inc., et al.,¹ : Case No. 09-12452 (CSS)
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Debtors. : Jointly Administered
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: **Objection Deadline: March 18, 2010 at 4:00 p.m. (ET)**
: **Hearing Date: March 25, 2010 at 10:00 a.m. (ET)**
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**NOTICE OF DEBTORS' FIFTH OMNIBUS (SUBSTANTIVE) OBJECTION TO
CLAIMS PURSUANT TO SECTION 502(b) OF THE BANKRUPTCY CODE,
BANKRUPTCY RULES 3003 AND 3007, AND LOCAL RULE 3007-1**

TO: (I) THE OFFICE OF THE UNITED STATES TRUSTEE FOR THE DISTRICT OF DELAWARE; (II) THE HOLDERS OF THE DISPUTED CLAIMS; (III) COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS; (IV) COUNSEL TO THE AGENT FOR THE PREPETITION SECURED LENDERS; (V) COUNSEL FOR THE AD HOC COMMITTEE OF RATHGIBSON SENIOR NOTES AND DIP LENDERS; AND (VI) THOSE PARTIES WHO HAVE REQUESTED NOTICE PURSUANT TO BANKRUPTCY RULE 2002, IN ACCORDANCE WITH DEL. BANKR. LR 2002-1(b).

PLEASE TAKE NOTICE that the above-captioned debtors and debtors in possession (the "Debtors") have filed the **Debtors' Fifth Omnibus (Substantive) Objection to Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1** (the "Objection"), a copy of which is attached hereto. By the Objection, the Debtors seek to disallow or modify your claim as set forth more fully in the exhibits to the Objection.

PLEASE TAKE FURTHER NOTICE that responses to the Objection, if any, must be filed on or before **March 18, 2010 at 4:00 p.m. (ET)** (the "Response 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 also serve a copy of the response upon the undersigned counsel to the Debtors so that the response is received on or before the Response Deadline.

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PLEASE TAKE FURTHER NOTICE that every response to the Objection must contain at a minimum the following:

- (a) a caption setting forth the name of the Court, the case number and the title of the Objection to which the Response is directed;
- (b) the name of the Claimant and description of the basis for the amount of the Claim, if applicable;
- (c) a concise statement setting forth the reasons why the Claim should not be disallowed or modified for the reasons set forth in the Objection, including, but not limited to, the specific factual and legal bases upon which the responding party will rely in opposing the Objection;
- (d) all documentation or other evidence of the Claim or assessed value, to the extent not included with the Proof of Claim previously filed with the Bankruptcy Court, upon which the responding party will rely in opposing the Objection at the Hearing;
- (e) the address(es) to which the Debtors must return any reply to the response, if different from that presented in the Claim; and
- (f) the name, address and telephone number of the person (which may be the Claimant or his/her/its legal representative) possessing ultimate authority to reconcile, settle or otherwise resolve the Claim or response to the Objection on behalf of the responding party.

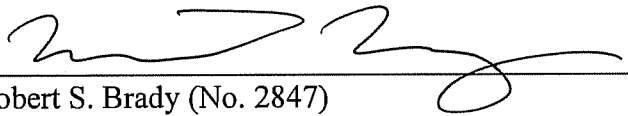
PLEASE TAKE FURTHER NOTICE that questions about the Objection should be directed to co-counsel for the Debtors (Michael S. Neiburg, (302) 576-3590 or mneiburg@ycst.com). CLAIMANTS SHOULD NOT CONTACT THE CLERK OF THE COURT TO DISCUSS THE MERITS OF THEIR CLAIMS.

PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE OBJECTION WILL BE HELD ON MARCH 25, 2010 AT 10:00 A.M. (ET) BEFORE THE HONORABLE CHRISTOPHER S. SONTCHI IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 5TH FLOOR, COURTROOM NO. 6, WILMINGTON, DE 19801. YOU HAVE THE RIGHT TO APPEAR TELEPHONICALLY AT THE HEARING ON THE OBJECTION. A COPY OF THE BANKRUPTCY COURT'S PROCEDURES REGARDING TELEPHONIC APPEARANCES IS ENCLOSED WITH THIS NOTICE.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: Wilmington, Delaware
February 23, 2010

YOUNG CONAWAY STARGATT & TAYLOR, LLP



Robert S. Brady (No. 2847)
Matthew B. Lunn (No. 4119)
Michael S. Neiburg (No. 5275)
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1000 West Street, 17th Floor
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-and-

WILLKIE FARR & GALLAGHER LLP
Paul V. Shalhoub
Robin Spigel
Andrew Sorkin
787 Seventh Avenue
New York, New York 10019
(212) 728-8000

Co-Counsel for the Debtors and
Debtors in Possession

INSTRUCTIONS FOR TELEPHONIC APPEARANCES
EFFECTIVE JANUARY 5, 2005
Revised April 27, 2009

The United States Bankruptcy Court for the District of Delaware has arranged for parties to participate by telephonic appearance in hearings using CourtCall, an independent conference call company.

Under no circumstances may any participant record or broadcast the proceedings conducted by the Bankruptcy Court.

I. POLICY GOVERNING TELEPHONIC APPEARANCES
Local counsel must appear in person in all matters before the court.

Telephonic appearances are allowed in all matters before Court except the following:

1. Trials and evidentiary hearings - all counsel and all witnesses must appear in person;
2. Chapter 11 status conferences - debtor and debtor's counsel must appear in person, other parties in interest may appear telephonically;
3. Chapter 11 confirmation hearings - debtor, debtor's counsel, and all objecting parties must appear in person;
4. Hearings on reaffirmation agreements - debtor must appear in person;
5. Any matter designated by the court as one requiring a personal appearance.

No telephonic appearance will be allowed unless it is made through CourtCall pursuant to the procedures set forth in section II.

Parties filing a motion, application or other pleading, including, without limitation, an objection or response thereto, may participate by telephonic appearance. Any party not submitting a pleading, but interested in monitoring the court's proceedings, may participate by telephonic appearance in "listen-only" mode.

If an individual schedules a telephonic appearance and then fails to respond to the call of a matter on calendar, the court may pass the matter or may treat the failure to respond as a failure to appear. Individuals making use of the conference call service are cautioned that they do so at their own risk.

To ensure the quality of the record, the use of car phones, cellular phones, speaker phones, public telephone booths or phones in other public places is prohibited. Each time you speak, you must identify yourself for the record. Do not place the call on hold at any time. When the Judge informs the participants that the hearing is completed, you may disconnect.

II. SCHEDULING A TELEPHONIC APPEARANCE

1. Participants must notify CourtCall by phone (866-582-6878) or by facsimile (866-533-2946) no later than 12:00 p.m. one business days prior to the hearing. Individual Chambers must be contacted regarding any late requests for telephonic appearances.
2. Participants must provide the following information:
 - a. Case name and number
 - b. Name of Judge
 - c. Hearing date and time
 - d. Name, address, phone number of participant
 - e. Party whom participant represents
 - f. Matter on which the participant wishes to be heard or whether the participant intends to monitor the proceeding in "listen-only" mode.
3. Participants intending to be heard by the Bankruptcy Court must send written notification to debtor's counsel and/or opposing counsel providing same information as above.
4. Participants will receive fax confirmation and instructions for telephonic appearance from CourtCall. It is the participant's responsibility to dial into the call not later than 10 minutes prior to the scheduled hearing.
5. Any questions about telephonic appearances should be directed to CourtCall at 866-582-6878.

III. FEES

The fee for the telephonic appearance is fixed by CourtCall depending on the length of time the participant is on the call, regardless of whether the participant is actually heard by the Bankruptcy Court or is in "listen only" mode. Each participant will be charged or billed an initial fee of \$50.00 at the time of reservation with CourtCall, with appropriate increments, if any, to be charged or billed based upon the Fee Rate.

The Fee Rate for telephonic appearances is as follows:

<u>Call Length</u>	<u>Fee</u>
0-90 minutes	\$ 50.00
91-180 minutes	\$ 80.00
181-270 minutes	\$120.00
271-360 minutes	\$160.00
361 minutes and above	\$ 40.00 per each additional 90 minute increment

There are no subscription fees and no special equipment is required to use the service.

EXHIBIT 1

Declaration of Jon M. Smith

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

----- X
In re : Chapter 11
:
RathGibson, Inc., et al.,¹ : Case No. 09-12452 (CSS)
:
Debtors. : Jointly Administered
:
:
----- X

**DECLARATION OF JON M. SMITH IN SUPPORT OF
DEBTORS' FIFTH OMNIBUS (SUBSTANTIVE) OBJECTION TO
CLAIMS PURSUANT TO SECTION 502(b) OF THE BANKRUPTCY CODE,
BANKRUPTCY RULES 3003 AND 3007, AND LOCAL RULE 3007-1**

I, Jon M. Smith, pursuant to 28 U.S.C. § 1746, declare:

1. I am the Chief Financial Officer of RathGibson, Inc. and the other above-captioned debtors and debtors in possession (collectively, the "Debtors"). In this capacity, I am one of the persons responsible for overseeing the claims reconciliation and objection process in the Debtors' chapter 11 cases. I have read the Debtors' Fifth Omnibus (Substantive) Objection to Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1 (the "Objection"),² and am directly, or by and through my personnel or agents, familiar with the information contained therein, the proposed form of order (the "Proposed Order") and the exhibits attached thereto.

2. Considerable resources and time have been expended in reviewing and reconciling the proofs of claim filed or pending against the Debtors in these cases. The claims

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² Capitalized terms not otherwise defined herein shall have the meaning ascribed to such terms in the Objection.

were carefully reviewed and analyzed in good faith utilizing due diligence by the appropriate personnel, including the Debtors' claims agent The Garden City Group, Inc. ("GCG"). These efforts resulted in the identification of the "No Liability Claims," as defined in the Objection and identified on Exhibit A to the Proposed Order, respectively.


3. The information contained in Exhibit A to the Proposed Order is true and correct to the best of my knowledge.

4. The Debtors have reviewed their books and records and determined that they have no record of any liability on account of the claims identified in Exhibit A to the Proposed Order. Accordingly, to prevent the claimants from receiving an unwarranted recovery, the Debtors seek to expunge and disallow in full the No Liability Claims.

[Signature page follows]

I declare under penalty of perjury under the laws of the United States of America
that the foregoing is true and correct.

Executed on February 23, 2010



Jon M. Smith
Chief Financial Officer

EXHIBIT 2

Proposed Order

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

----- X
In re : Chapter 11
RathGibson, Inc., et al.,¹ : Case No. 09-12452 (CSS)
Debtors. : Jointly Administered
: **Ref Docket No.:** _____
----- X

**ORDER SUSTAINING DEBTORS' FIFTH OMNIBUS (SUBSTANTIVE)
OBJECTION TO CLAIMS PURSUANT TO SECTION 502(b) OF THE
BANKRUPTCY CODE, BANKRUPTCY RULES 3003 AND 3007,
AND LOCAL RULE 3007-1**

Upon consideration of the fifth omnibus (substantive) objection (the "Objection") of the above-captioned debtors and debtors in possession (the "Debtors"), by which the Debtors respectfully request the entry of an order pursuant to section 502(b) of title 11 of the United States Code (the "Bankruptcy Code"), Rules 3003 and 3007, of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Rule 3007-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "Local Rules") disallowing and expunging in full each of the Disputed Claims² identified on Exhibit A attached hereto; and it appearing that the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and that due and adequate notice of the Objection having been given under the circumstances; and sufficient cause appearing thereof; it is hereby

ORDERED that the Objection is sustained as set forth herein; and it is further

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² All capitalized terms not otherwise defined herein shall have the meaning ascribed to such terms in the Objection.

ORDERED that the Disputed Claims identified on the attached Exhibit A are hereby disallowed and expunged in their entirety; and it is further

ORDERED that the Debtors reserve the right to amend, modify or supplement this Objection, and to file additional objections to any claims filed in these chapter 11 cases including, without limitation, the claims that are the subject of this Objection; and it is further

ORDERED that this Court shall retain jurisdiction over all affected parties with respect to any matters, claims, or rights arising from or related to the implementation and interpretation of this Order.

Dated: Wilmington, Delaware
March ____, 2010

CHRISTOPHER S. SONTCHI
UNITED STATES BANKRUPTCY JUDGE

EXHIBIT A

No Liability Claims

RathGibson, Inc.
No Liability Claims

<u>Claimant</u>	<u>Case Number</u>	<u>Proof of Claim Number</u>	<u>Date Filed</u>	<u>Proof of Claim Amount</u> Unliquidated	<u>Reconciled Claim Amount</u>	<u>Proof of Claim Priority</u>	<u>Comments</u>
Chartis, Inc. Michelle Levitt, Authorized Representative 175 Water Street 18th Floor New York, New York 10038	09-12454	170	9/2/2009		\$0.00	S	This contingent and unliquidated claim is for amounts allegedly owed to claimant for premiums, deductibles, and other related fees, expenses and obligations for insurance coverages and related services provided to the Debtors by the claimant. The Debtors' books and records indicate no amounts are currently owed to the claimant on account of such coverages and services since the Debtors have paid and will continue pay amounts owed to the claimant in the ordinary course of business.
Chartis, Inc. Michelle Levitt, Authorized Representative 175 Water Street 18th Floor New York, New York 10038	09-12455	171	9/2/2009	Unliquidated	\$0.00	S	This contingent and unliquidated claim is for amounts allegedly owed to claimant for premiums, deductibles, and other related fees, expenses and obligations for insurance coverages and related services provided to the Debtors by the claimant. The Debtors' books and records indicate no amounts are currently owed to the claimant on account of such coverages and services since the Debtors have paid and will continue pay amounts owed to the claimant in the ordinary course of business.
Chartis, Inc. Michelle Levitt, Authorized Representative 175 Water Street 18th Floor New York, New York 10038	09-12543	172	9/2/2009	Unliquidated	\$0.00	S	This contingent and unliquidated claim is for amounts allegedly owed to claimant for premiums, deductibles, and other related fees, expenses and obligations for insurance coverages and related services provided to the Debtors by the claimant. The Debtors' books and records indicate no amounts are currently owed to the claimant on account of such coverages and services since the Debtors have paid and will continue pay amounts owed to the claimant in the ordinary course of business.

RathGibson, Inc.
No Liability Claims

<u>Claimant</u> Chartis, Inc. Michelle Levitt, Authorized Representative 175 Water Street 18th Floor New York, New York 10038	<u>Case Number</u> 09-12452	<u>Proof of Claim Number</u> 173	<u>Date Filed</u> 9/2/2009	<u>Proof of Claim Amount</u> Unliquidated	<u>Reconciled Claim Amount</u> \$0.00	<u>Proof of Claim Priority</u> S	<u>Comments</u> This contingent and unliquidated claim is for amounts allegedly owed to claimant for premiums, deductibles, and other related fees, expenses and obligations for insurance coverages and related services provided to the Debtors by the claimant. The Debtors' books and records indicate no amounts are currently owed to the claimant on account of such coverages and services since the Debtors have paid and will continue pay amounts owed to the claimant in the ordinary course of business.
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