

Thereof; and (II) Granting Related Relief (the “Bid Procedures Motion”), which the Debtors are filing concurrently herewith; (ii) permitting parties to file objections to the Bid Procedures Motion, if any, on or before March 18, 2010 at noon (prevailing Eastern Time); and (iii) allowing the Bid Procedures Motion to be heard at the hearing scheduled for March 23, 2010 at 1:00 p.m. (prevailing Eastern Time). In support of this Motion to Shorten, the Debtors respectfully represent as follows:

1. Local Rule 9006-1(c)(i) requires that all motion papers be filed and served at least fourteen (14) days prior to the hearing date scheduled for such motion, and seventeen (17) days if notice is given by mail, unless the Bankruptcy Rules state otherwise. Bankruptcy Rule 2002 requires twenty-one (21) days’ notice prior to the hearing on a motion seeking the “proposed use, sale, or lease of property of the estate other than in the ordinary course of business” Fed. R. Bankr. P. 2002(a)(2). Further, pursuant to Local Rule 9006-1(e), such period may be shortened by order of the Court upon written motion specifying the exigencies supporting shortened notice. See also Fed. R. Bankr. P. 2002(a)(2) (providing that the court for cause shown may shorten time or direct another method of providing notice).

2. For the reasons set forth herein, the Debtors believe that cause exists for consideration of the Bid Procedures Motion on an expedited basis.

3. As this Court is aware, since the inception of these cases, the Debtors’ chief goals have been to exit chapter 11 as expeditiously as possible, while at the same time maximizing value for their estates, creditors and stakeholders. To that end, on July 13, 2009 (the “Petition Date”), Debtors RathGibson, Inc. and Greenville Tube Company (the “Initial Plan Debtors”) filed their *Joint Chapter 11 Plan for RathGibson, Inc. and Greenville Tube Company*

[Docket No. 32] and the *Disclosure Statement for Joint Chapter 11 Plan for RathGibson, Inc. and Greenville Tube Company* [Docket No. 33] with the Court.

4. On August 28, 2010, the Initial Plan Debtors filed the *Disclosure Statement for First Amended Joint Chapter 11 Plan for RathGibson, Inc. and Greenville Tube Company* [Docket No. 231] (the “Initial Disclosure Statement”) in connection with the *First Amended Joint Chapter 11 Plan of RathGibson, Inc. and Greenville Tube Company* [Docket No. 260](the “Initial Plan”). At a hearing held on August 31, 2009, the Court approved the disclosure statement [Docket No. 242] (the “Initial DS Order”)² and the Debtors commenced solicitation of the Initial Plan in accordance with the Initial DS Order.

5. However, following the solicitation of votes in respect of the Initial Plan, the Debtors determined it was appropriate to amend the Initial Plan to, among other things, provide for the inclusion of RG Tube Holdings LLC and RGCH Holdings Corp. in the chapter 11 plan, implement a more tax efficient restructuring and settle and compromise certain potential intercompany and intercreditor disputes. Since completion of solicitation in connection with the Initial Plan, the Debtors have been working diligently with their key constituencies to enter into a global settlement of open issues are filing an amended chapter 11 plan (the “Plan”) and related disclosure statement (the “Disclosure Statement”) contemporaneously herewith. The Plan reflects a global settlement of: (i) various intercompany claims; (ii) the Debtors’ dispute with the Ad Hoc RGCH PIK Noteholders Committee (as defined in the Bid Procedures Motion); and (iii) issues raised by the Creditors’ Committee regarding various matters.

² On September 2, 2009, the Court entered an amended order approving the Initial Disclosure Statement [Docket No. 254].

6. The Plan also provides for the sale, assumption, assignment and/or transfer of all or substantially all of the Debtors' assets (the "Sale") to the RathGibson Acquisition Co, LLC (the "Stalking Horse Bidder") or such other person or entity that submits the highest or otherwise best bid for the Debtors' assets. The Sale is an integral component to the Plan, and consummation of the Sale and consummation of the Plan are inextricably intertwined. Accordingly, the Debtors are seeking approval of the Bid Procedures Motion as the first, critical step towards pursuing Plan confirmation.

7. Section 7.2 of the Stalking Horse Agreement prohibits the Debtors from, among other things, soliciting interest from prospective bidders, assisting any prospective bidders with diligence in connection with Sale, or marketing the Debtors' assets until entry of the proposed Bid Procedures Order. The Stalking Horse Agreement also requires entry of an order confirming the Plan by no later than June 1, 2010. In order to take advantage of a longer marketing period, the Debtors are seeking approval of the Bid Procedures Motion on an expedited basis. In addition, the Creditors' Committee supports this Motion to Shorten and the expedited relief requested herein. The Debtors believe that consideration of the Bid Procedures Motion on an expedited basis is in the best interests of the Debtors' estates, creditors and stakeholders.

8. Therefore, the Debtors respectfully request that (i) the Bid Procedures Motion be heard at the hearing scheduled for March 23, 2010 at 1:00 p.m. (prevailing Eastern Time), and (ii) objections or responses to the relief requested in the Bid Procedures Motion be

filed and served on the undersigned counsel for the Debtors by 12:00 p.m. (prevailing Eastern Time) on March 18, 2010, unless such time is extended by the Debtors.³

NOTICE

9. Notice of this Motion to Shorten has been provided to: (a) the U.S. Trustee; (b) counsel to the indenture trustee under RathGibson, Inc.'s 11.25% senior notes ("Senior Notes"); (c) counsel to the agent for RGCH Holdings Corp.'s prepetition unsecured lenders; (d) counsel to the agent for the Lenders, the Stalking Horse Bidder and the ad hoc committee of the holders of the Senior Notes; (e) counsel to the Creditors' Committee; and (f) those parties entitled to receive notices under Bankruptcy Rule 2002. The Debtors submit that, under the circumstances, no other or further notice is required.

NO PRIOR REQUEST

10. No previous request for the relief sought herein has been made to this or any other court.

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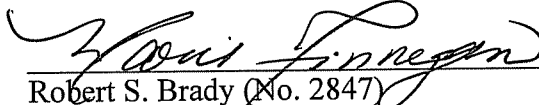
³ Local Rule 9006-1(c)(ii) requires that the objection deadline with respect to motions be scheduled to permit all objections to be filed and served at least seven (7) days prior to the scheduled hearing date.

CONCLUSION

WHEREFORE, the Debtors respectfully request that the Court enter an order, substantially in the form attached hereto as Exhibit A, (i) approving the shortened notice period requested herein and the form, manner and sufficiency of notice of Bid Procedures Motion; (ii) permitting parties to file objections to the Bid Procedures Motion, if any, on or before March 18, 2010 at noon (prevailing Eastern Time); granting the Debtors' request to allow the Bid Procedures Motion and any objections thereto to be heard at the hearing scheduled for March 23, 2010 at 1:00 p.m. (prevailing Eastern Time); and (iv) granting the Debtors such other and further relief as the Court deems just and proper.

Dated: Wilmington, Delaware
March 8, 2010

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EXHIBIT A

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)
 :
 : Jointly Administered
Debtors. :
 : Re: Docket No. ____
 :
-----X

**ORDER SHORTENING THE TIME FOR NOTICE OF THE DEBTORS' MOTION
FOR AN ORDER (I)(A) APPROVING BID PROCEDURES WITH RESPECT TO
SALE; (B) APPROVING BID PROTECTIONS WITH RESPECT TO STALKING
HORSE BIDDER; (C) APPROVING ASSUMPTION, ASSIGNMENT AND/OR
TRANSFER PROCEDURES; AND (D) SCHEDULING AN AUCTION AND
APPROVING THE FORM AND MANNER OF NOTICE THEREOF;
AND (II) GRANTING RELIEF REQUESTED**

Upon the motion of the Debtors (the "Motion to Shorten")² for entry of an order shortening notice pursuant to Rules 2002 and 9006 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Rules 2002-1(b) and 9006-1(e) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), with respect to a hearing on the *Debtors' Motion for an Order (I)(A) Approving Bid Procedures With Respect to Sale; (B) Approving Bid Protections With Respect to Stalking Horse Bidder; (C) Approving Assumption, Assignment, and/or Transfer Procedures; and (D) Scheduling an Auction and Approving the Form and Manner of Notice Thereof; and (II)*

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.

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Motion to Shorten.

Granting Related Relief (the “Bid Procedures Motion”); and it appearing that the relief requested in the Motion to Shorten is in the best interests of the Debtors’ estates, creditors and other parties in interest; and notice of the Motion to Shorten being appropriate under the particular circumstances and no other or further notice need be given; and after due deliberation and sufficient cause appearing therefore,

IT IS HEREBY ORDERED that:

1. The Motion to Shorten is granted as set forth herein.
2. Parties shall file and serve objections to the Bid Procedures Motion, if any, on or before March 18, 2010 at 12:00 p.m. (prevailing Eastern Time).
3. A hearing with respect to the Bid Procedures Motion and any objections thereto shall be held on March 23, 2010 at 1:00 p.m. (prevailing Eastern Time).
4. This Court shall retain jurisdiction over any and all matters arising from or related to the implementation or interpretation of this Order.

Dated: March ____, 2010
Wilmington, Delaware

THE HONORABLE CHRISTOPHER S. SONTCHI
UNITED STATES BANKRUPTCY JUDGE