

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

IN RE	§	
	§	
AMERICAN PAD & PAPER COMPANY	§	CHAPTER 7
	§	
DEBTORS.	§	CASE NOS. 00-00066 (JHW)
	§	THROUGH 00-00068 (JHW)
	§	
	§	CASE NOS. 00-00070 (JHW)
	§	THROUGH 00-00072 (JHW)
	§	
	§	Substantively Consolidated

NOTICE OF BAR DATE OF FEBRUARY 10, 2005 AT 4:00 P.M. FOR FILING A REQUEST FOR ALLOWANCE OF A CLAIM FOR ADMINISTRATIVE COSTS OR EXPENSES THAT AROSE, ACCRUED, OR OTHERWISE BECAME DUE AND PAYABLE ON AND BETWEEN JANUARY 10, 2000 AND BEFORE DECEMBER 1, 2004, AND THE PROCEDURE TO FILE SUCH REQUEST

PLEASE TAKE NOTICE OF THE FOLLOWING:

- I. On January 10, 2000, involuntary petitions were filed under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”). These Chapter 11 cases converted to Chapter 7 Cases on December 21, 2001. Steven G. Singer is the Chapter 7 Trustee for these cases. The Honorable Judith H. Wizmur is the United States Bankruptcy Judge presiding over these Chapter 7 cases.

- II. Prepetition, the entities American Pad & Paper Company (Case No. 00-00066), American Pad & Paper Sales Company, Inc. (Case No. 00-00067), American Pad & Paper Company of Delaware, Inc. (Case No. 00-00068), AP&P Manufacturing, Inc. (Case No. 00-00070), WR Acquisition, Inc. (Case No. 00-00071), and AP&P Financing Company, Inc. (Case No. 00-00072) (collectively, the “Debtors”) comprised one of the largest manufacturers and marketers of nationally branded and private label paper-based office products (excluding copy paper) in the North American office products industry. The Debtors’ AMPAD division was among the largest manufacturers of writing pads and notebooks, filing supplies, retail envelopes and machine papers to many of the largest office products retailers and distributors. The Debtors’ Williamhouse division was the leading supplier of mill branded, specialty and commodity business envelopes and machine papers to paper merchants/distributors and jobbers. The Debtors’ Creative Card division manufactured

invitations, announcements, Christmas cards, other holiday cards, and PC desktop stationery. The Debtors employed approximately 4,000 full-time employees at plants and offices located in California, Colorado, Georgia, Illinois, Massachusetts, Mississippi, New Jersey, New York, Pennsylvania, Tennessee, Texas, Utah, Washington, and Wisconsin.

- III. Previously, this Court established and sent a notice to all creditors of a date by which all general unsecured claims must be filed with the Court (the “general bar date”). The general bar date was June 15, 2000.
- IV. The Chapter 7 Trustee has requested that the United States Bankruptcy Court fix a bar date for the filing of certain claims as stated below. On December 3, 2004, the Honorable Judith H. Wizmur, United States Bankruptcy Judge, entered an Order Approving Motion of Chapter 7 Trustee To: (1) Fix Bar Date For Administrative Claims, and (2) Approve the Form and Manner of Notice in Connection Therewith (the “Order”).
- V. Pursuant to that Order, Judge Wizmur approved **February 10, 2005 at 4:00 p.m., prevailing Eastern Standard Time** as the Bar Date.
- VI. Pursuant to that Order, all persons and entities, including, without limitation, present and former employees, all other individuals, partnerships, corporations, estates, trusts and governmental units, holding or wishing to assert claims (as defined in section 101(5) of title 11 of the United States Code (the “Bankruptcy Code”)) against the Debtors or the Chapter 7 estates that are entitled to administrative expense priority pursuant to sections 503 and 507(a)(1) of the Bankruptcy Code and that first accrued or were incurred during the period from and including January 10, 2000 and before December 1, 2004 are required to file, on or before the Bar Date of **February 10, 2005 at 4:00 p.m prevailing Eastern Standard Time.**, except as provided herein, a separate request on account of any claim for payment of an administrative expense such creditor holds or wishes to assert against the Debtors or the Chapter 7 estates.
- VII. Notwithstanding anything in this Notice to the contrary, holders of Administrative Expense Claims of the following type or nature are *excluded* from having to file a request for the allowance of Administrative Expense Claims by the Bar Date:
 - a. Any Administrative Expense Claim which arose, accrued, and otherwise became due and payable subsequent to December 1, 2004.
 - b. Any holder of an Administrative Expense Claim whose

Administrative Expense Claim heretofore has been allowed by an order of this Court, or who has previously filed a proof of claim seeking administrative expense status with the Clerk of the Bankruptcy Court or with Poorman Douglas Corp., or with Delaware Claims Agency.

- c. Any administrative expense claim held by a professional or independent contractor currently employed by the Chapter 7 Trustee, or subsequently employed by the Chapter 7 Trustee, pursuant to an order of this Court pursuant to section 327 of Title 11 of the Bankruptcy Code.¹

VIII. Do not file request for the allowance of an Administrative Expense Claim if you do not have a claim (as defined in section 101(5) of title 11 of the United States Code (the “Bankruptcy Code”)) against the Debtors or the Chapter 7 estates that is entitled to administrative expense priority pursuant to sections 503 and 507(a)(1) of the Bankruptcy Code and that first accrued or was incurred during the period from and including during the period from and including January 10, 2000 and before December 1, 2004. The fact that you have received this notice does not mean that you have an administrative expense claim, or that the Trustee or the Court believe that you have an administrative expense claim. Any inquiry as whether you should file a request for the allowance of an Administrative Expense Claim, should be directed to your own attorney, and not to the Court or the Trustee or his professionals.

IX. If you file a request for the allowance of an Administrative Expense Claim, the request should substantially conform to the Claim Form attached to this notice, and provide all the information required by that Claim Form. Attach copies of supporting documents, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, court judgments, mortgages, security agreements, and evidence of perfection of lien, as applicable. **DO NOT SEND ORIGINAL DOCUMENTS.** If the documents are not available, please explain. If the documents are voluminous, attach a summary.

X. The original of your claim must be sent to American Pad & Paper Company Claims Processing, c/o Delaware Claims Agency, LLC. If sent by first class mail, then mail to American Pad & Paper Company Claims Processing, c/o Delaware Claims Agency LLC,

¹This includes, with limitation, Cooch and Taylor; BTB Associates, LLC; John H. Rodgers; Kaplan Fox; Delaware Claims Agency, LLC; Cetrulo & Capone LLP; Herrick, Feinstein LLP; Ehrenkrantz Sterling & Co., and Friedman, LLP.

P.O. Box 515, Wilmington, Delaware 19899. If delivered by hand or by courier service, then deliver to American Pad & Paper Company Claims Processing, c/o Delaware Claims Agency LLC, 2 East 7th Street, Suite 201, Wilmington, DE 19801. This Claim must be **actually received** by American Pad & Paper Company Claims Processing, c/o Delaware Claims Agency, LLC by **4:00 p.m., February 10, 2005**, prevailing Eastern Standard Time. No electronic submissions or facsimiles will be accepted.

- XI. Except for the holders of Administrative Expense Claims described in paragraph VII above, ANY CLAIMANT WHO HOLDS OR WISHES TO ASSERT AN ADMINISTRATIVE EXPENSE CLAIM AGAINST THE DEBTORS OR THE CHAPTER 7 ESTATES THAT AROSE, ACCRUED, OR OTHERWISE BECAME DUE AND PAYABLE ON OR AFTER JANUARY 10, 2000, AND BEFORE DECEMBER 1, 2004; AND WHO FAILS TO FILE A REQUEST FOR THE ALLOWANCE OF AN ADMINISTRATIVE EXPENSE CLAIM SO THAT THE REQUEST IS RECEIVED BY DELAWARE CLAIMS AGENCY, ON OR BEFORE **4:00 P.M. PREVAILING EASTERN STANDARD TIME ON FEBRUARY 10, 2005** SHALL BE FOREVER BARRED, ESTOPPED AND ENJOINED FROM ASSERTING SUCH ADMINISTRATIVE CLAIM AGAINST THE DEBTORS, THE CHAPTER 7 ESTATES OR THE PROPERTY OF THE ESTATES.
- XII. The Court does not through this Notice or its Order approving this Notice extend any previous bar date or claims deadline previously established in these cases.

Dated: Wilmington, Delaware
December 3, 2004

BY ORDER OF THE COURT:

/s/Judith H. Wizmur

The Honorable Judith H. Wizmur
United States Bankruptcy Judge