

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:) Case Nos. 02-12826 and 02-12827 (MFW)
) Chapter 11
MOBILE TOOL INTERNATIONAL, INC.,)
et al.,)
)
Debtors.)

**NOTICE OF PRODUCT LIABILITY AND PERSONAL INJURY BAR DATE
REQUIRING FILING OF PROOFS OF CLAIM ON OR BEFORE
JANUARY 31, 2004, 4:00 PM, PREVAILING EASTERN TIME**

TO ALL PERSONS AND ENTITIES WITH PRODUCT LIABILITY AND/OR PERSONAL
INJURY CLAIMS AGAINST ANY OF THE FOLLOWING DEBTORS:

Mobile Tool International, Inc.
MTI-Insulated Products, Inc.

These entities have also done business under the following names:

Telsta
Ameriquip
Puregas

PLEASE TAKE NOTICE THAT:

1. On September 30, 2002, Mobile Tool International, Inc. and MTI-Insulated Products, collectively the "Debtors," filed voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the District of Delaware (the "Court"). Their cases are being jointly administered under Case No. 02-12826 (MFW).

2. Under the Bankruptcy Code, the Debtors are granted certain protections against creditors. A creditor is anyone to whom the Debtors owe money or property. This includes parties asserting claims arising out of product liability or personal injuries asserted against the Debtors ("Product Claims").

3. On November 20, 2003, the Court entered an order (the "Bar Date Order") establishing **January 31, 2004 at 4:00 p.m., Prevailing Eastern Time** (the "Product Liability

4. Bar Date") as the last date in time for filing proofs of claim based on product liability and/or personal injury claims ("Product Claims") against the Debtors. The Product Liability Bar Date and the procedures set forth below for filing Proofs of Claim based on Product Claims apply to all Product Claims against the Debtors that arose up to and including January 31, 2004.

You **MUST** file a proof of claim by the Product Liability Bar Date if you have a Product Claim. Acts or omissions of the Debtors that arose prior to January 31, 2004, may give rise to Product Claims against the Debtors notwithstanding such claims may not have matured or become fixed or liquidated prior to such date. Under Section 101(5) of the Bankruptcy Code and as used herein, the word "Claim" means: (a) right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured or unsecured; or (b) right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured or unsecured.

5. You should not file a proof of claim by the Product Liability Bar Date if you are:
- a. any person or entity that has already properly filed, with the Clerk of the United States Bankruptcy Court for the District of Delaware, a Proof of Claim reflecting a Product Claim against any of the Debtors in the form and manner required by Bankruptcy Rules 3003 and 9009 and substantially conforming to Official Bankruptcy Form No. 10;
 - b. any person or entity that asserts a claim against the Debtors that is not a Product Claim;
 - c. any person or entity whose pre-petition Claim has been paid in full post-petition by the Debtors pursuant to authorization of this Court; and
 - d. any person or entity that holds a Claim that has been allowed by a final order of this Court entered on or before the Product Liability Bar Date.

YOU SHOULD NOT FILE A PROOF OF CLAIM IF YOU DO NOT HAVE A PRODUCT CLAIM AGAINST THE DEBTORS, OR IF THE CLAIM HAS BEEN PAID. THE FACT THAT YOU HAVE RECEIVED THIS NOTICE DOES NOT MEAN THAT YOU HAVE A CLAIM OR THAT THE DEBTORS OR THE COURT BELIEVE THAT YOU HAVE A CLAIM.

6. Except as provided for herein, proofs of claim reflecting Product Claims must be filed so as to be received on or before 4:00 p.m., Prevailing Eastern Time, on January 31, 2004, at the following address:

DELAWARE CLAIMS AGENCY, LLC
c/o Mobile Tool International, Inc. and MTI-Insulated Products, Inc.
P.O. Box 515
Wilmington, DE 19899
(800) 838-6773

A proof of claim will be deemed timely filed only if the original proof of claim is actually received by the Delaware Claims Agency on or before the Product Liability Bar Date. A proof of claim may not be delivered by facsimile or telecopy.

7. If you file a proof of claim, your filed proof of claim must (i) be written in the English language, (ii) be denominated in lawful currency of the United States, (iii) conform substantially with Official Form No. 10. If a proof of claim form is not enclosed herewith, you may obtain a proof of claim form from any bankruptcy court clerk's office, from your lawyer, from certain business supply stores, or by calling (800) 838-6773. **YOU SHOULD ATTACH TO YOUR COMPLETED PROOF OF CLAIM FORM COPIES OF ANY WRITINGS UPON WHICH SUCH CLAIM IS BASED.**

8. **YOU MUST SPECIFICALLY IDENTIFY THE DEBTOR AGAINST WHICH YOU ASSERT A CLAIM. YOU SHOULD INCLUDE ALL CLAIMS AGAINST A PARTICULAR DEBTOR IN A SINGLE PROOF OF CLAIM FORM. IF YOU HAVE A CLAIM AGAINST MORE THAN ONE DEBTOR, YOU MUST FILE A SEPARATE PROOF OF CLAIM FORM AGAINST EACH DEBTOR.**

9. **ANY CREDITOR ASSERTING A PRODUCT CLAIM WHO FAILS TO FILE A PROOF OF CLAIM ON OR BEFORE 4:00 P.M., PREVAILING EASTERN TIME, ON JANUARY 31, 2004, FOR ANY PRODUCT CLAIM SUCH CREDITOR HOLDS OR WISHES TO ASSERT AGAINST THE DEBTORS WILL BE FOREVER BARRED, ESTOPPED AND ENJOINED FROM ASSERTING SUCH PRODUCT CLAIM (OR FILING A PROOF OF CLAIM WITH RESPECT TO SUCH PRODUCT CLAIM) AGAINST THE DEBTORS AND THE DEBTORS AND THEIR PROPERTY, WILL BE FOREVER DISCHARGED FROM ANY AND ALL INDEBTEDNESS OR LIABILITY WITH RESPECT TO SUCH PRODUCT CLAIM AND SUCH HOLDER MAY NOT BE PERMITTED TO VOTE ON ANY PLAN OF REORGANIZATION OR PARTICIPATE IN ANY DISTRIBUTION IN THESE CHAPTER 11 CASES ON ACCOUNT OF SUCH PRODUCT CLAIM OR TO RECEIVE FURTHER NOTICES REGARDING SUCH PRODUCT CLAIM.**

10. If you have any questions concerning the filing, amount, nature, or processing of a proof of claim, please call Delaware Claims Agency (800) 838-6773 . YOU SHOULD CONSULT YOUR ATTORNEY REGARDING ANY OTHER INQUIRIES, SUCH AS WHETHER YOU SHOULD FILE A PROOF OF CLAIM. DO NOT ATTEMPT TO CONTACT THE COURT FOR ADVICE.

BY ORDER OF THE COURT:

Mary F. Walrath, United States Bankruptcy Judge