

The matters set for hearing are divided into the following categories for the purposes of this Proposed Agenda:

- A. Introduction
- B. Continued Or Adjourned Matters (17 Matters)
- C. Uncontested, Agreed, Or Settled Matters (6 Matters)
- D. Contested Non-Evidentiary Matters (8 Matters)
- E. Contested Evidentiary Matter (1 Matter)

B. Continued Or Adjourned Matters

1. **"Interim Compensation"** – Motion For Administrative Order Under 11 U.S.C. § 331 (I) Establishing Procedures For Interim Compensation And Reimbursement Of Expenses Of Professionals And (II) Setting A Final Hearing Thereon (Docket No. 11)

Response Filed: None.

Reply Filed: None.

Related Filing: Order Under 11 U.S.C. § 331 Establishing Procedures For Interim Compensation And Reimbursement Of Expenses Of Professionals (Docket No. 869)

Status: This matter with respect to the Fee Committee is being adjourned to January 5, 2006 at the request of the U.S. Trustee.

2. **"KECP Motion"** – Motion For Order Under 11 U.S.C. §§ 105 And 363 Authorizing The Debtors To Implement A Key Employee Compensation Program (Docket No. 13)

Response Filed: Objection Of Wilmington Trust Company, As Indenture Trustee, To Debtors' Motion For Order Under 11 U.S.C. §§ 105 And 363 Authorizing The Debtors To Implement A Key Employee Compensation Program (Docket No. 1133); Objections Of USW To Debtors' Motion For Order Under Sections 105 And 363 Authorizing The

Debtors To Implement A Key Employee Compensation Program (Docket No. 1134); Objection And Memorandum Of UAW In Opposition To Debtors' Motion For An Order Authorizing Debtors To Implement A Key Employee Compensation Program (Docket No. 1135); Objection Of Pension Benefit Guaranty Corporation To Debtors' Motion For Order §§ 105 And 363 Authorizing Debtors To Implement A Key Employee Compensation Program (Docket No. 1141); Objections And Memorandum Of Law In Support Of Objection Of IBEW Local 663 And IAM District 10 To Motion For Order Authorizing Debtors To Implement A Key Employee Compensation Plan (Docket No. 1156); Limited Objection Of The Prepetition Agent To The Debtors' Motion For Order Under §§ 105 And 363 Authorizing The Debtors To Implement A Key Employee Compensation Program (Docket No. 1157); Objections And Memorandum Of Law Of International Union Of Operating Engineers Local Union Nos. 18, 101 And 832 To Debtors' Motion For An Order Authorizing The Debtors To Implement A Key Employee Compensation Program (Docket No. 1159); Lead Plaintiffs' Objection To Debtors' Motion For Order Under §§ 105 And 363 Authorizing Debtors To Implement A Key Employee Compensation Program (Docket No. 1161); Objection And Memorandum Of Law In Support Of Objection Of IUE-CWA To Motion For Order Under §§ 105 And 363 Authorizing The Debtors To Implement A Key Employee Compensation Program ("KECP Motion") (Docket No. 1164). The U.S. Trustee's objection deadline has been extended to November 28, 2005; the Creditors' Committee objection deadline has been extended to December 12, 2005.

Reply Filed: None.

Related Filing: None.

Status: This matter is being adjourned to January 5, 2006 pursuant to an agreement between the Debtors and the Creditors' Committee.

3. **"Claims Trading"** – Motion For Order Under 11 U.S.C. §§ 105, 362, And 541 And Fed. R. Bankr. P. 3001 Establishing Notification And Hearing Procedures For Trading In Claims And Equity Securities (Docket No. 29)

Responses Filed: *Objection To Debtor's Motion For An Order Under 11 U.S.C. Sections 105, 362 And 541 Of The Bankruptcy Code And Fed. R. Bankr. P. 3001 Establishing Notification And Hearing Procedures For Trading In Claims And Securities (Docket No. 76); Appaloosa Management L.P.'s (A) Objection To Debtors' Motion For An Order Under 11 U.S.C. Sections 105, 362 And 541 And Fed. R. Bankr. P. 3001 Establishing Notification And Hearing Procedures For Trading In Claims And Equity Securities Or, In The Alternative, (B) Motion For Reconsideration Under Fed. R. Bankr. P. 9023 Of Interim Trading Order Dated October 12, 2005 (Docket No. 596); Objection Of D.C. Capital Partners, L.P. To Entry Of Final Order Establishing Procedures For Trading In Equity Securities And Claims And Request For Vacatur Of Interim Trading Procedures Order (Docket No. 1117)*

Reply Filed: *None.*

Related Filing: *Interim Order Under 11 U.S.C. §§ 105, 362, And 541 And Fed. R. Bankr. P. 3001 Establishing Notification And Hearing Procedures For Trading In Claims And Equity Securities (Docket No. 126).*

Status: *This matter is being adjourned to January 5, 2006 with respect to the objections filed at docket nos. 76 and 1117 pursuant to an agreement between the responding parties and the Debtors, with a full reservation of rights to all parties-in-interest. This matter with respect to the response filed by Appaloosa Management L.P. has been resolved.*

4. **"Utilities"** – Motion For Interim And Final Orders Under 11 U.S.C. §§ 105, 366, 503, And 507 (I) Prohibiting Utilities From Altering, Refusing, Or Discontinuing Services On Account Of Prepetition Invoices And (II) Establishing Procedures For Determining Requests For Additional Assurance (Docket No. 41)

Responses Filed: *Objection Of SBC Communications Inc. To The Debtors' Motion For Final Order Under 11 U.S.C. §§ 105, 366, 503 And 507 (I) Prohibiting Utilities From Altering, Refusing Or Discontinuing Services*

On Account Of Prepetition Invoices And (II) Establishing Procedures For Determining Requests For Additional Adequate Assurance (Docket No. 559); Objection Of Certain Utility Companies To Motion For Interim And Final Orders Under 11 U.S.C. §§ 105, 366, 503 And 507 (I) Prohibiting Utilities From Altering, Refusing Or Discontinuing Services On Account Of Prepetition Invoices And (II) Establishing Procedures For Determining Requests For Additional Adequate Assurance (Docket No. 563); Response Of Constellation Newenergy, Inc. To Motion For Final Order Under 11 U.S.C. §§ 105, 366, 503 And 507 (I) Prohibiting Utilities From Altering, Refusing Or Discontinuing Services On Account Of Prepetition Invoices And (II) Establishing Procedures For Determining Requests For Additional Adequate Assurance (Docket No. 568); Objection Of AT&T Corp. To Debtors' Motion For An Order Pursuant To Section 366(b) Of The Bankruptcy Code Deeming Utilities Adequately Assured Of Future Performance (Docket No. 572); Objection Of Entergy To Motion Of Debtors For Interim And Final Orders Under 11 U.S.C. §§ 105, 366, 503 And 507 (I) Prohibiting Utilities From Altering, Refusing Or Discontinuing Services On Account Of Prepetition Invoices And (II) Establishing Procedures For Determining Requests For Additional Adequate Assurance (Docket No. 575)

Reply Filed: None.

Related Filing: *Interim Order Under 11 U.S.C. §§ 105, 366, 503, And 507 (I) Prohibiting Utilities From Altering, Refusing, Or Discontinuing Services On Account Of Prepetition Invoices (Docket No. 234); Final Order Under 11 U.S.C. §§ 105, 366, 503, And 507 (I) Prohibiting Utilities From Altering, Refusing, Or Discontinuing Services On Account Of Prepetition Invoices And (II) Establishing Procedures For Determining Requests For Additional Assurance (Docket No. 760)*

Status: *This matter is being adjourned to January 5, 2006 with respect to SBC Communications Inc. This matter with respect to the responses filed by AT&T Corp., Entergy Mississippi, Inc., American Electric Power, Dominion East Ohio, New York State*

Electrical And Gas Corporation, Niagara Mohawk Power Corporation, Public Services Electric And Gas Company, And Rochester Gas & Electric Corporation has been resolved.

5. **"Specmo Enterprises"** – Specmo Enterprises' Motion For Relief From Stay To Effect Setoff (Docket No. 284)

Response Filed: None.

Reply Filed: None.

Related Filing: Brief In Support Of Specmo Enterprises' Motion For Relief From Stay To Effect Setoff (Docket No. 288)

Status: This matter is being adjourned to January 5, 2006.

6. **"Schmidt Technology GmbH"** – Order To Show Cause (Docket No. 477)

Response Filed: None.

Reply Filed: None.

Related Filing: Order To Show Cause (Docket No. 816)

Status: This matter is being adjourned to January 5, 2006 pursuant to an agreement between the parties to permit settlement negotiations to continue.

7. **"The Lee Company"** – Order To Show Cause (Docket No. 699)

Response Filed: None.

Reply Filed: None.

Related Filing: Order To Show Cause (Docket No. 842)

Status: An agreement in principle has been reached between the parties. This matter is being adjourned to January 5, 2006 to permit the parties to prepare an agreed upon order for submission to the Court.

8. **"Behr Industries"** – Order To Show Cause (Docket No. 774)

Response Filed: Response Of Behr Industries, Inc. To Order To Show Cause (Docket No. 1119).

Reply Filed: None.

Related Filing: Order To Show Cause (Docket No. 853)

Status: *This matter is being adjourned to January 5, 2006 pursuant to an agreement between the parties to permit settlement negotiations to continue.*

9. **"Decatur Plastic Products, Inc."** – Demand To Exercise Setoff By Decatur Plastic Products, Inc. (Docket No. 799)

Response Filed: *None.*

Reply Filed: *None.*

Related Filing: *None.*

Status: *This matter is being adjourned to January 5, 2006.*

10. **"Tricon Industries, Inc."** – Tricon Industries, Inc.'s Motion For Modification Of Automatic Stay For Limited Purpose Of Effectuating Setoff (Docket No. 805)

Response Filed: *None.*

Reply Filed: *None.*

Related Filing: *None.*

Status: *This matter is being adjourned to January 5, 2006.*

11. **"Means Industries"** – Means Industries' Motion To Set Off Pre-Petition Payment Against Pre-Petition Claims (Docket No. 818)

Response Filed: *None.*

Reply Filed: *None.*

Related Filing: *None.*

Status: *This matter is being adjourned to January 5, 2006.*

12. **"Eclipse Tool & Die, Inc."** – Eclipse Tool & Die, Inc.'s Motion For Relief From Automatic Stay (Docket No. 957)

Response Filed: *None.*

Reply Filed: *None.*

Related Filing: *None.*

Status: *This matter is being adjourned to January 5, 2006.*

13. **"Mercedes-Benz U.S. International, Inc."** – Mercedes-Benz U.S. International, Inc.'s Motion Pursuant To 11 U.S.C. § 362 For Relief From The Automatic Stay (Docket No. 983)
- Response Filed:* None.
- Reply Filed:* None.
- Related Filing:* Mercedes-Benz U.S. International, Inc.'s Evidentiary Submission In Support Of Its Position (Docket No. 1094)
- Status:* This matter is being adjourned to January 5, 2006.
14. **"Niagara Mohawk"** – Motion For Order Under 11 U.S.C. Sections 105(a) And 365 Authorizing The Debtors To Obtain Preferential Power Rates Pursuant To Letter Agreement With Niagara Mohawk Power Corporation And Assumption Thereof (Docket No. 997)
- Response Filed:* None.
- Reply Filed:* None.
- Related Filing:* None.
- Status:* The underlying matter is subject to the consent of the New York Power Authority which was scheduled to meet on November 22, 2005. This meeting was rescheduled to December 2005. Accordingly, the parties request that this matter be adjourned to January 5, 2006.
15. **"Entergy Mississippi, Inc."** – Motion Of Entergy For (I) Relief From Stay To Exercise Recoupment And/Or Setoff Rights Pursuant To Section 553 Of The Bankruptcy Code And (II) Other Related Relief (Docket No. 1024)
- Response Filed:* None.
- Reply Filed:* None.
- Related Filing:* None.
- Status:* This matter is being adjourned to January 5, 2006.
16. **"DBM Technologies, LLC"** – Motion By DBM Technologies, LLC For Relief From Stay To Effect Setoff (Docket No. 1042)
- Response Filed:* None.
- Reply Filed:* None.

Related Filing: None.

Status: This matter is being adjourned to January 5, 2006.

17. **"Lead Plaintiffs"** – Lead Plaintiffs' Motion For A Limited Modification Of The Automatic Stay (Docket No. 1063)

Response Filed: None.

Reply Filed: None.

Related Filing: None.

Status: This matter is being adjourned to January 5, 2006.

C. Uncontested, Agreed, Or Settled Matters

18. **"Macauto USA, Inc."** – Order To Show Cause (Docket No. 785)

Response Filed: None.

Reply Filed: None.

Related Filing: Order To Show Cause (Docket No. 852)

Status: An agreement in principle has been reached and an agreed order is being prepared for submission to the Court.

19. **"365(d)(4) Deadline Extension Motion"** – Motion For Order Under 11 U.S.C. § 365(d)(4) Extending Deadline To Assume Or Reject Leases Of Nonresidential Real Property (Docket No. 995)

Response Filed: Objection Of ORIX Warren, LLC To Motion For Order Under 11 U.S.C. § 365(d)(4) Extending Deadline To Assume Or Reject Leases Of Nonresidential Real Property (Docket No. 1123)

Reply Filed: None.

Related Filing: None.

Status: An order will be submitted for consideration by the Court.

20. **"JLL Retention"** – Debtors' Application For Order Under 11 U.S.C. Sections 327(a) And 328 And Fed. R. Bankr. P. 2014(a) Authorizing The Employment and Retention Of Jones Lang Lasalle Americas, Inc. As Real

Estate Administrative And Transaction Services Provider To Debtors
(Docket No. 996)

Response Filed: None.

Reply Filed: None.

Related Filing: None.

Status: An order will be submitted for consideration by the Court.

21. **"Consumers Energy"** – Motion For Order Under 11 U.S.C. Sections 105(a), 363, And 365 Authorizing The Debtors To Preserve Option To Enter Into New Power Contract With Preferential Rates With Consumers Energy Company And Ancillary Assumption Of Related Power Contracts (Docket No. 998)

Response Filed: None.

Reply Filed: None.

Related Filing: None.

Status: An order will be submitted for consideration by the Court.

22. **"WCPHD Retention"** – Debtors Application For Entry Of Order Under 11 U.S.C. §§ 327(e) And 1107(b) Authorizing Employment and Retention Of Wilmer Cutler Pickering Hale And Dorr LLP As Special Regulatory Counsel (Docket No. 999)

Response Filed: None.

Reply Filed: None.

Related Filing: First Supplemental Declaration And Disclosure Statement Of Charles Davidow In Support Of Application For Entry Of Order Under 11 U.S.C. §§ 327(e) And 1107(b) Authorizing Employment and Retention Of Wilmer Cutler Pickering Hale And Dorr LLP As Special Regulatory Counsel (Docket No. TBD)

Status: An order will be submitted for consideration by the Court.

23. **"Latham & Watkins Retention"** – Application Of The Official Committee Of Unsecured Creditors For Order Authorizing And Approving

The Employment And Retention Of Latham & Watkins LLP As Counsel Nunc Pro Tunc To October 17, 2005 (Docket No. 1086)

Response Filed: None.

Reply Filed: None.

Related Filing: None.

Status: An Interim Order on a nunc pro tunc basis to the date of appointment, with a full reservation of rights to all parties-in-interest, will be submitted for consideration by the Court.

D. Contested Non-Evidentiary Matters

24. **"Rothschild Retention"** – Application For Order Under 11 U.S.C. §§ 327(a) And 328 (I) Authorizing Employment And Retention Of Rothschild Inc. As Financial Advisor And Investment Banker To Debtors And (II) Scheduling Final Hearing Thereon (Docket No. 52)

Response Filed: Letter objection from Robert E. Newton (not filed)

Reply Filed: None.

Related Filing: Interim Order Under 11 U.S.C. §§ 327(a) And 328 (I) Authorizing Employment And Retention Of Rothschild Inc. As Financial Advisor And Investment Banker To Debtors And (II) Scheduling Final Hearing Thereon (Docket No. 272)

Status: The hearing with respect to this matter will be proceeding. A draft order will be submitted for consideration by the Court with a revised engagement letter that has been negotiated with the agent for the prepetition lenders and the Creditors' Committee.

25. **"The Retiree Committee Order"** – Motion To Vacate Or Amend Order (I) Appointed Unions As Authorized Representatives For Union-Represented Retirees Under 11 U.S.C. §§ 1114(c) or 1114(d) Or, In The Alternative, (II) Establishing Procedures For Solicitation, Nomination, And Appointment Of Committee Of Retired Employees (Docket No. 595)

Response Filed: Objection To Motion To Vacate Or Amend Order (I) Appointing Unions As Authorized Representatives For Union-Represented Retirees Under 11 U.S.C. §§ 1114(c) or 1114(d) Or, In The Alternative, (II) Establishing Procedures For Solicitation,

Nomination, And Appointment Of Committee Of Retired Employees (Docket No. TBD)

Reply Filed: None.

Related Filing: None.

Status: The hearing with respect to this matter will be proceeding.

26. **"Official Committee Of Retirees"** – Motion For Appointment Of Official Committee Of Retirees Pursuant To 11 U.S.C. § 1114(d) Consisting Of Persons Receiving Retiree Benefits Not Covered By A Collective Bargaining Agreement (Docket No. 874)

Response Filed: Debtors' Objection To Motion For Appointment Of Official Committee Of Retirees Pursuant To 11 U.S.C. § 1114(d) Consisting Of Persons Receiving Retiree Benefits Not Covered By A Collective Bargaining Agreement (Docket No. TBD)

Reply Filed: None.

Related Filing: None.

Status: The hearing with respect to this matter will be proceeding.

27. **"Pillarhouse (U.S.A.), Inc."** – Motion For Order Fixing A Deadline For The Debtors To Assume Or Reject An Executory Contract With Pillarhouse (U.S.A.), Inc. (Docket No. 917)

Response Filed: Debtors' Omnibus Objection To Motions Seeking Deadline For Debtors To Assume Or Reject Certain Executory Contracts (Docket No. TBD)

Reply Filed: None.

Related Filing: Memorandum Of Law (Docket No. 918)

Status: The hearing with respect to this matter will be proceeding.

28. **"Russell Reynolds Associates, Inc."** – Motion For Order Fixing Deadline For The Debtors To Assume Or Reject Executory Contract With Russell Reynolds Associates, Inc. (Docket No. 986)

Response Filed: Debtors' Omnibus Objection To Motions Seeking Deadline For Debtors To Assume Or Reject Certain Executory Contracts (Docket No. TBD)

Reply Filed: None.

Related Filing: Memorandum Of Law In Support Of Russell Reynolds Associates, Inc.'s Motion to Compel The Debtor To Assume Or Reject Executory Contract (Docket No. 1003)

Status: The hearing with respect to this matter will be proceeding.

29. **"Bank Of America Leasing & Capital, LLC"** – Motion Of Bank Of America, N.A. (I) To Provide Adequate Protection Of Security Interests In Collateral; And (II) To Terminate The Automatic Stay With Respect To Cash Collateral (Docket No. 1022)

Response Filed: Limited Objection Of Pentastar Aviation, LLC To Motion Of Bank Of America, N.A. (I) To Provide Adequate Protection Of Security Interests In Collateral; And (II) To Terminate The Automatic Stay With Respect To Cash Collateral (Docket No. 1251); Debtors' Objection To The Motion Of Bank Of America N.A. For (I) Adequate Protection Of Security Interests In Collateral; And (II) Termination Of The Automatic Stay Regarding Cash Collateral (Docket No. 1269)

Reply Filed: Response Of Bank Of America, N.A. To Limited Objection Of Pentastar Aviation, LLC To Motion For Adequate Protection And For Relief From Automatic Stay (Docket No. 1284)

Related Filing: None.

Status: The hearing with respect to this matter will be proceeding.

30. **"Sensus Precision Die Casting, Inc."** – Motion for Order Under 11 U.S.C. § 365(d)(2) Directing the Debtors to Determine Within 30 Days Whether to Assume or Reject Their Executory Contracts With Sensus Precision Die Casting, Inc. (Docket No. 1028)

Response Filed: Debtors' Omnibus Objection To Motions Seeking Deadline For Debtors To Assume Or Reject Certain Executory Contracts (Docket No. TBD)

Reply Filed: None.

Related Filing: Amended Motion for Order Under 11 U.S.C. § 365(d)(2) Directing the Debtors to Determine Within 30 Days Whether to Assume or Reject Their Executory Contracts With Sensus Precision Die Casting, Inc. (Docket No. 1097)

Status: The hearing with respect to this matter will be proceeding.

31. **"Solectron Manufactura De Mexico, S.A."** – Motion For Order Fixing A Deadline For The Debtors To Assume Or Reject An Executory Contract With Solectron Manufactura De Mexico, S.A. (Docket No. 1087)

Response Filed: Debtors' Omnibus Objection To Motions Seeking Deadline For Debtors To Assume Or Reject Certain Executory Contracts (Docket No. TBD)

Reply Filed: None.

Related Filing: Memorandum Of Points And Authorities In Support Of Motion For Order Fixing A Deadline For The Debtors To Assume Or Reject An Executory Contract With Solectron Manufactura De Mexico, S.A. (Docket No. 1088)

Status: The hearing with respect to this matter will be proceeding.

E. Contested Evidentiary Matter

32. **"Supplier Agreement Assumption Procedures"** – Motion For An Order Under 11 U.S.C. §§ 363(b) And 365(a) And Fed. R. Bankr. P. 9019 Approving Procedures To Assume Certain Amended And Restated Sole Source Supplier Agreements (Docket No. 1098)

*Responses Filed:** Objection of Wilmington Trust Company, As Indenture Trustee To Debtors' Motion For Order Under 11 U.S.C. §§ 363(b) And 365(a) And Fed. R. Bankr. P. 9019 Approving Procedures To Assume Certain Amended And Restated Sole Source Supplier Agreements (Docket No. 1114); Statement Directing Notice Regarding Debtors' Motion For An Order Approving Procedures To Assume Certain Sole Supplier Agreements (Docket No. 1127); Limited Objection By Robert Bosch Corporation And

* Includes all responses filed up to and including 10:00 a.m. (prevailing eastern time) on November 28, 2005.

Affiliates To Supplier Agreement Assumption Procedures Motion (Docket No. 1160); Objection Of SPS Technologies, LLC A/K/A SPS Technologies-Cleveland, NSS Technologies, Inc. SPS Technologies Waterford Company And Greer Stop Nut, Inc. To Debtors Motion For An Order Under 11 U.S.C. §§ 363(b) And 365(a) And Fed. R. Bankr. P. 9019 Approving Procedures To Assume Certain Amended And Restated Sole Source Supplier Agreements (Docket No. 1178); Quasar's Objection To Supplier Agreement Assumption Procedures Motion (Docket No. 1195); Coaters' Objection To Supplier Agreement Assumption Procedures Motion (Docket No. 1197); Limited Objection To Supplier Agreement Assumption Procedures Motion By Fourteen Suppliers (Docket No. 1199); Response And Objection Of Southwire Company To Debtors' Motion For An Order Under U.S.C. §§ 363(b) And 365(a) And Fed. R. Bankr. P. 9019 Approving Procedures To Assume Certain Amended And Restated Sole Source Supplier Agreements (Docket No. 1200); Joinder Of Neuman Aluminum Automotive, Inc. And Neuman Aluminum Impact Extrusion, Inc. In Limited Objection To Supplier Agreement Assumption Procedures Motion (Docket No. 1205); Objection Of SKF USA, Inc. To Debtors' Motion For An Order Under 11 U.S.C. §§ 363(b) And 365(a) And Fed. R. Bankr. P. 9019 Approving Procedures To Assume Certain Amended And Restated Sole Source Supplier Agreements (Docket No. 1207); Limited Objection Of Hydro Aluminum Adrian, Inc. And Hydro Aluminum Rockledge, Inc., To Debtor's Supplier Agreement Assumption Procedures Motion (Docket No. 1208); Limited Objection Of Engelhard Corporation To Debtors' Motion For An Order Under 11 U.S.C. §§ 363(b) And 365(a) And Fed. R. Bankr. P. 9019 Approving Procedures To Assume Certain Amended And Restated Sole Source Supplier Agreements (Docket No. 1210); Limited Objection Of Hydro Aluminum Adrian, Inc. And Hydro Aluminum Rockledge, Inc., To Debtor's Supplier Agreement Assumption Procedures Motion (Docket No. 1211); Objection Of Hayes Lemmerz International, Inc. (On Behalf Of Itself And Its Affiliates And Subsidiaries) To Debtors' Motion For Order Under 11 U.S.C. §§ 363(b) And 365(a) And Fed. R. Bankr. P. 9019

Approving Procedures To Assume Certain Amended And Restated Sole Source Supplier Agreements (Docket No. 1214); Objection Of Niles, USA., Inc. And Wintech, Inc. To Debtor's Supplier Assumption Procedures Motion (Docket No. 1215); Objection Of Lear Corporation (On Behalf Of Itself And Its Affiliates And Subsidiaries) To Debtors' Motion For Order Under 11 U.S.C. §§ 363(b) And 365(a) And Fed. R. Bankr. P. 9019 Approving Procedures To Assume Certain Amended And Restated Sole Source Supplier Agreements (Docket No. 1217); Objection Of American Axle & Machinery, Inc. (On Behalf Of Itself And Its Affiliates And Subsidiaries) To Debtor's Motion For Order Under 11 U.S.C. §§ 363(b) And 365(a) And Fed. R. Bankr. P. 9019 Approving Procedures To Assume Certain Amended And Restated Sole Source Supplier Agreements (Docket No. 1219); Objection Of Freudenberg-NOK, General Partnership And Its Subsidiaries, Freudenberg-NOK, Inc., Flexitech, Inc. And Vibracoustic De Mexico, S.A. De C.V. To Debtors' Motion For Order Under 11 U.S.C. §§ 363(b) And 365(a) And Fed. R. Bankr. P. 9019 Approving Procedures To Assume Certain Amended And Restated Sole Source Supplier Agreements (Docket No. 1220); Objection Of Pentastar Aviation, LLC (On Behalf Of Itself And Its Affiliates And Subsidiaries) To Debtors' Motion For Order Under 11 U.S.C. §§ 363(b) And 365(a) And Fed. R. Bankr. P. 9019 Approving Procedures To Assume Certain Amended And Restated Sole Source Supplier Agreements (Docket No. 1221); Limited Objection Of Rotor Clip Company Inc. To Debtors' Motion For An Order Under 11 U.S.C. §§ 363(b) And 365(a) And Fed. R. Bankr. P. 9019 Approving Procedures To Assume Certain Amended And Restated Sole Source Supplier Agreements (Docket No. 1223); Amended Objection Of Wilmington Trust Company, As Indenture Trustee, To Debtors' Motion For Order Under 11 U.S.C. §§ 363(b) And 365(a) And Fed. R. Bankr. P. 9019 Approving Procedures To Assume Certain Amended And Restated Sole Source Supplier Agreements (Docket No. 1224); Objection Of The Official Committee Of Unsecured Creditors To Debtors' Motion For An Order Under 11 U.S.C. §§ 363(b) And 365(a) And Fed. R. Bankr. P. 9019 Approving Procedures To Assume Certain Amended

And Restated Sole Source Supplier Agreements (Docket No. 1228); Objection Of DENSO International America, Inc. And Affiliates To Supplier Agreement Assumption Procedures Motion (Docket No. 1229); Le Belier/LBQ Foundry S.A. De C.V.'s Objection To Motion For An Order Under 11 U.S.C. §§ 363(b) And 365(a) And Fed. R. Bankr. P. 9019 Approving Procedures To Assume Certain Amended And Restated Sole Source Supplier Agreements (Docket No. 1234); Joinder Of S&Z Tool & Die, Inc. And Robin Industries, Inc. In Limited Objection To Supplier Agreement Assumption Procedures Motion (Docket No. 1236); Limited Objection To Supplier Agreement Assumption Motion (Docket No. 1237); Limited Objection To Supplier Agreement Assumption Motion (Docket No. 1238); Objection Of Dott Industries, Inc., Alps Automotive, Inc., Pioneer Automotive Technologies, Inc., Lakeside Plastics Limited, BASF Corporation, And Sumitomo Corporation Of America, Et Al. To Debtors' Motion For An Order Under 11 U.S.C. § 363(b) And § 365(a) And Fed. R. Bankr. P. 9019 Approving Procedures To Assume Certain Amended And Restated Sole Source Supplier Agreements (Docket No. 1240); Objection, Statement, Joinder Of Baker Hughes Incorporated And Baker Petrolite Corporation To Debtor's Motion For Order Approving Procedures To Assume Certain Amended And Restated Sole Source Supplier Agreements (Docket No. 1242); Objection Of Miniature Precision Components, Inc. To The Debtors' Motion For An Order Under 11 U.S.C. §§ 363(b) And 365(a) And Fed. R. Bankr. P. 9019 Approving Procedures To Assume Certain Amended And Restated Sole Source Supplier Agreements (Docket No. 1243); Limited Objection To Debtors' Supplier Agreement Assumption Procedures Motion And Joinder In Separate Objections To Motion (Docket No. 1245); Objection Of Serigraph, Inc. To The Debtors' Motion For An Order Under 11 U.S.C. §§ 363(b) And 365(a) And Fed. R. Bankr. P. 9019 Approving Procedures To Assume Certain Amended And Restated Sole Source Supplier Agreements (Docket No. 1246); Limited Objection To Debtors' Supplier Agreement Assumption Procedures Motion And Joinder In Separate Objections To Motion (Docket No. 1247);

Response And Request For Clarification Of Wamco, Inc. To Motion For An Order Under 11 U.S.C. §§ 363(b) And 365(a) And Fed. R. Bankr. P. 9019 Approving Procedures To Assume Certain Amended And Restated Sole Source Supplier Agreements (Docket No. 1248); Objection Of Texas Instruments Incorporated To Debtors' Motion For An Order Under 11 U.S.C. §§ 363(b) And 365(a) And Fed. R. Bankr. P. 9019 Approving Procedures To Assume Certain Amended And Restated Sole Source Supplier Agreements (Docket No. 1249); Objection Of Wren Industries, Inc. And Koyo Corporation To Motion Of Debtors For Order Under 11 U.S.C. §§ 363(b) And 365(a) And Fed. R. Bankr. P. 9019 Approving Procedures To Assume Certain Sole Supplier Agreements (Docket No. 1253); Limited Objection And Reservation Of Rights Of Textron Fastening Systems, Inc., Its Subsidiaries And Affiliates, And Detroit Heading LLC With Respect To Debtors' Motion For An Order Approving Procedures To Assume Certain Amended And Restated Sole Source Supplier Agreements (Docket No. 1254); Objection And Joinder Of Datwyler Entities To Debtors' Supplier Agreement Assumption Procedures Motion (Docket No. 1255); Limited Objection Of INA USA Inc. To Motion For Order Approving Assumption Procedures (Docket No. 1256); Limited Objection Of Molex, Inc. To Motion For Order Approving Assumption Procedures (Docket No. 1257); Objection Of Hexcel Corporation To Supplier Agreement Assumption Procedures Motion (Docket No. 1258); Objection By Alcan Rolled Products-Ravenswood, LLC To Supplier Agreement Assumption Procedures Motion (Docket No. 1264); Objection By SPX Corporation (Contech Division) To Supplier Agreement Assumption Procedures Motion (Docket No. 1265); Objection By Tenneco Inc. To Supplier Agreement Assumption Procedures Motion (Docket No. 1266); Joinder Of Cascade Die Casting Group, Inc. To Objection Of Quasar Industries, Inc. To Debtors' Supplier Agreement Assumption Procedures Motion (Docket No. 1270); Joinder Of Hitachi Automotive Products (USA), Inc. To SPS Technologies And Quasar Objections To Debtors' Assumption Procedures Motion (Docket No. 1272); Statement Of Position And Reservation Of Rights Of Semiconductor Components Industries,

L.L.C. Regarding Supplier Agreement Assumption Procedures Motion (Docket No. 1273); Joinder Of Autocam Corporation To Objection Of Quasar Industries, Inc. To Debtors' Supplier Agreement Assumption Procedures Motion (Docket No. 1274); Objection Of DBM Technologies, LLC To Supplier Agreement Assumption Procedures Motion (Docket No. 1276)

Reply Filed: An omnibus response will be filed.

Related Filing: Statement Of JPMorgan Chase Bank, N.A., As Administrative Agent For The Debtor In Possession Lenders, In Support Of The Debtors' Motion For An Order Approving Procedures To Assume Certain Amended And Restated Sole Source Supplier Agreements (Docket No. 1203); Response Of UAW In Support Of Relief Requested In Debtors' Supplier Agreement Assumption Motion (Docket No. 1267); Declaration Of Randall S. Eisenberg In Support Of The Motion For An Order Under 11 U.S.C. §§ 363(b) And 365(a) And Fed. R. Bankr. P. 9019 Approving Procedures To Assume Certain Amended And Restated Sole Source Supplier Agreements (Docket No. 1278); Declaration Of R. David Nelson In Support Of Motion For An Order Under 11 U.S.C. §§ 363(b) And 365(a) And Fed. R. Bankr. P. 9019 Approving Procedures To Assume Certain Amended And Restated Sole Source Supplier Agreements (Docket No. 1279); Declaration Of John D. Sheehan In Support Of Motion For An Order Under 11 U.S.C. §§ 363(b) And 365(a) And Fed. R. Bankr. P. 9019 Approving Procedures To Assume Certain Amended And Restated Sole Source Supplier Agreements (Docket No. 1280)

Status: The hearing with respect to this matter will be proceeding.

Dated: New York, New York
November 28, 2005

SKADDEN, ARPS, SLATE, MEAGHER
& FLOM LLP

By: /s/ John Wm. Butler, Jr.
John Wm. Butler, Jr. (JB 4711)
John K. Lyons (JL 4951)
Ron E. Meisler (RM 3026)
333 West Wacker Drive, Suite 2100
Chicago, Illinois 60606
(312) 407-0700

- and -

By: /s/ Kayalyn A. Marafioti
Kayalyn A. Marafioti (KM 9632)
Thomas J. Matz (TM 5986)
Four Times Square
New York, New York 10036
(212) 735-3000

Attorneys for Delphi Corporation, et al.,
Debtors and Debtors-in-Possession