

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

In re) Chapter 11
)
) Case No. 09-12869 (JVA)
SENCORP, et al.,¹) (Joint Administration Requested)
)
) Honorable J. Vincent Aug, Jr.
Debtors.)
)

**MOTION FOR ENTRY OF AN ORDER
ESTABLISHING CERTAIN NOTICE, CASE MANAGEMENT
AND ADMINISTRATIVE PROCEDURES**

(“MOTION TO ESTABLISH CASE MANAGEMENT PROCEDURES”)

The above-captioned debtors and debtors-in-possession (collectively, the “**Debtors**”) hereby move this Court (the “**Motion**”) for entry of an order (the “**Order**”), in substantially the form attached hereto as Exhibit B, establishing certain notice, case management and administrative procedures in these chapter 11 cases (the “**Chapter 11 Cases**”) as detailed below.

In support of this Motion, the Debtors respectfully state:²

JURISDICTION

1. This Court has jurisdiction over this Motion under 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue of this proceeding and this Motion in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

¹ The Debtors in these Chapter 11 cases are: SENCORP, Senco Products, Inc., Senco Export, Inc., SenSource Global Sourcing, LLC, TyRex, LLC, Global Fastening Solutions, LLC, Agrifast, LLC, Nexicor, LLC, Omnifast, LLC, S C FINANCIAL, INC., Senco International, Inc., Sentron Medical, Inc., and Gregg Laboratories, Inc.

² The facts and circumstances supporting this Motion are set forth in the Affidavit of David T. Fyffe, Vice President-Corporate Financial Operations and Treasurer of SENCORP, in Support of First Day Motions (the “**First Day Affidavit**”), filed contemporaneously herewith.

2. The statutory bases for the relief requested herein are Rules 2002 and 9007 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) and Rule 9013-3 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of Ohio (the “**Local Bankruptcy Rules**”) and ECF Procedure 9.

BACKGROUND

3. The Debtors commenced these above-captioned cases (the “**Chapter 11 Cases**”) by filing voluntary petitions for relief under chapter 11 of the Bankruptcy Code on May 8, 2009 (the “**Petition Date**”). Pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code, the Debtors are operating their businesses and managing their affairs as debtors-in-possession. As of the date hereof, no creditors’ committee, trustee or examiner has been appointed in any of these Chapter 11 Cases.

4. The Debtors are a group of privately-held companies that collectively constitute a leading designer, manufacturer and distributor of branded pneumatic and battery powered staplers, nailers and screw systems and collated staples, nails and screws. The Debtors’ brand names are well-known in the industry for quality, reliability and service. The Debtors sell to a diversified customer base, including pro trades, industrial, consumer, international and commercial customer segments. Certain aspects of the Debtors’ businesses, including the SENCO name, have existed for over 50 years. As further evidence of the Debtors’ long-term success, most of the Debtors’ top ten customers have purchase products from the Debtors for more than 20 years.

5. Despite the Debtors’ historical strength, the Debtors have not been immune to the recent widespread economic downturn. Over the past several years, the Debtors’ sales volume and profitability have been negatively impacted by several economic factors, including (a) the sharp rise in the price of steel rod (the Debtors’ primary raw material) to historic levels in 2008,

(b) a severe decline in residential and commercial construction (the Debtors' primary customer segments) and (c) the deteriorating economic conditions leading to the current recession.

6. In response to these economic challenges, the Debtors implemented several critical initiatives in 2008 and early 2009. Among other things, the Debtors have implemented significant workforce reductions, as well as significant pay reductions for all of the Debtors' remaining employees, including senior management. The Debtors have also consolidated domestic manufacturing operations from two facilities to one, and have closed three of their six distribution centers. The Debtors have also implemented several moves designed to increase efficiency in inventory, supply and international operations.

7. Despite these efforts, it has recently become clear that the Debtors do not have sufficient liquidity to survive the current economic downturn in their current state. As a result, the Debtors engaged Mesirow Financial, Inc. ("Mesirow") on March 9, 2009 to serve as investment bankers for the Debtors to assist the Debtors in exploring possible sale transactions. Mesirow contacted over 100 financial and strategic parties, and after an intense, expedited marketing period the Debtors determined that the highest and best offer presently available to the Debtors was an offer from Wynnchurch Capital, Ltd. ("Wynnchurch") to serve as a stalking horse bidder in a sale of substantially all of the Debtors' assets under Section 363 of the Bankruptcy Code.

8. On April 10, 2009, the Debtors executed a Letter of Intent (the "LOI") with Wynnchurch representing Wynnchurch's stalking horse bid for substantially all of the Debtors' assets. Thereafter, on May 7, 2009, the Debtors entered into a binding asset purchase agreement (the "APA") with Wynnchurch and Wynnchurch's affiliate Senco Holdings, Inc. for the purchase of substantially all of the Debtors' assets for \$41 million in cash, plus the assumption of

certain liabilities. The APA requires the Debtors, among other things, to commence these Chapter 11 Cases by May 11, 2009, obtain by May 28, 2009 an order from this Court approving bidding procedures for the sale of the Debtors' assets, and to obtain an order from this Court by July 7, 2009 approving the sale of substantially all of the Debtors' assets to Wynnchurch (or its affiliates) or such other successful bidder as may be selected at the auction in accordance with the bidding procedures. The Debtors are proceeding with a proposed sale process on those timelines.

9. Subject to the approval of this Court, the Debtors have obtained a proposed debtor-in-possession financing facility (the "**DIP Facility**") from the Debtors' prepetition secured lenders, led by Bank of America, NA, as administrative agent (the "**DIP Agent**") and as a lender, which the Debtors believe will provide the Debtors with sufficient liquidity through the above-described sale process.

RELIEF REQUESTED

10. By this Motion, the Debtors seek an order of this Court, pursuant to Bankruptcy Rules 2002 and 9007, establishing special notice, scheduling, case management, hearing requirements and certain other administrative procedures. Specifically, the Debtors request that this Court enter an order: (i) establishing procedures for scheduling hearings, (ii) limiting notice in the above-captioned Chapter 11 Cases, (iii) designating the parties upon whom certain notices must be served by approving and establishing a Special Notice List (as defined in Exhibit A attached hereto), (iv) establishing the manner of service with respect to all matters for which the Bankruptcy Code and the Bankruptcy Rules authorize this Court to designate or limit the parties entitled to notice and the manner of service, including matters subject to Bankruptcy Rules 2002(i), 4001, 6004, 6006, 6007, and (v) authorizing electronic service of documents. The relief requested by this Motion is necessary to ensure the efficient administration of these Chapter 11

Cases while ensuring that all parties with significant interests in these proceedings have an opportunity to be heard.

11. The procedures described herein are set forth more fully in the case management procedures attached hereto as Exhibit A (as may be modified or amended, the “**Case Management Procedures**”). The Case Management Procedures will (a) be distributed by the Debtors to all entities on the Special Notice List (as defined in the Case Management Procedures); (b) be available from the Debtors’ undersigned counsel upon request; and (c) be included on the website of the Debtors’ claims, balloting and notice agent, The Garden City Group, Inc. (“**GCG**”), located at: <http://www.sencorp-reorg.com>. In the event that a modification or amendment is made to the Case Management Procedures, the revised Case Management Procedures shall be sent by the Debtors to all parties on the Special Notice List.

A. Monthly Omnibus Hearings

12. Given the number of parties in interest and the size and complexity of these Chapter 11 Cases, the Debtors request that this Court schedule regular, monthly omnibus hearings (the “**Omnibus Hearings**”) in accordance with Section A of the Case Management Procedures. No less than two (2) business days prior to any scheduled Omnibus Hearing, the Debtors will file with this Court an agenda of matters to be heard at the respective Omnibus Hearing, which may be subsequently modified up to and including the respective hearing date. By scheduling regular monthly Omnibus Hearings in advance, parties will be able to plan for hearings, thus reducing the need for emergency hearings and/or expedited relief and fostering consensual resolution of important matters.

13. The Debtors intend to consult with this Court’s Clerk and expect to propose the dates for the first several Omnibus Hearings in open Court when this Court hears this Motion.

B. Notice Procedures

14. Given the administrative costs of mailing notices to all of the Debtors' creditors and parties in interest in these chapter 11 proceedings, the Debtors request that the mailing matrix for all notices required by the Bankruptcy Code, the Bankruptcy Rules and the Local Bankruptcy Rules for the Southern District of Ohio (the "**Local Rules**") be limited to those parties set forth on the Special Notice List in accordance with Section B of the Case Management Procedures. In addition, to avoid unnecessary duplication efforts, the Debtors also request that, in accordance with ECF Procedure 9, no service, whether by e-mail or otherwise, be required to be made upon those parties receiving electronic service via this Court's Electronic Case Filing ("**ECF**") system.

15. The Debtors propose that any entity submitting a filing of any pleading in these Chapter 11 Cases (a "**Filing**") be required to serve electronic and paper notice of such Filing on the Special Notice List, except for those parties listed on the Special Notice List that receive electronic service via this Court's ECF system, which notice includes the title of the Filing, the time and date of any objection deadline, and the Omnibus Hearing Date (or any other hearing date) and at which time this Court will consider the Filing.

16. Any Objection to the request for relief under any Filing (a "**Request for Relief**") must be filed within fifteen (15) days of service of the motion or three (3) Business Days prior to the hearing date for which the Requested Relief is scheduled to be heard by this Court, whichever is earlier. The Debtors or any other party in interest may file a reply to any Objection to a Request for Relief up to and including the date of the scheduled hearing on the matter.

17. Subject to paragraph 17(b) below, all parties in interest have the opportunity to have their names and addresses placed on the Special Notice List by both filing with this Court (in accordance with this Court's ECF Procedures) and serving on counsel for the Debtors, a

formal request to be placed thereon, which request shall include (a) the requesting party's name, address, telephone number and the name and title of the appropriate individual to receive notices if the requesting party is not an individual, (b) facsimile number and (c) e-mail address.

- a. **Filing Requests for Documents Requires E-mail Address** – Subject to paragraph 17(b) below, a request for service of papers pursuant to Bankruptcy Rule 2002 and/or 9007 (each, a “**2002 Notice Request**”) filed with this Court in accordance with ECF Procedure 9 and Local Rules 5005-1 and 5005-4, shall be deemed proper and such person shall automatically receive electronic notice from the date of such filing in accordance with ECF Procedures 2 and 9 and shall be deemed to consent to such electronic notice and waive any notice by mail or otherwise. Any other party may request notice by non-ECF e-mail by providing a 2002 Notice Request with an appropriate e-mail address.
 - b. **Certification Opting Out of E-mail Service** – Any individual or entity filing a 2002 Notice Request who does not maintain (and cannot practicably obtain) an e-mail address and thereafter cannot receive e-mail must include in the 2002 Notice Request a certification to that effect (the “**Certification**”). The Certification shall include a statement certifying that the individual or entity (a) does not maintain an e-mail address and (b) cannot practicably obtain an e-mail address at which the individual or entity could receive service by e-mail.
18. The responsibility for service shall be as follows:
- a. **This Court** – The Clerk of Court shall be responsible for serving copies of any orders it has entered solely upon (i) counsel for the Debtors, (ii) the United States Trustee, (iii) and any creditors' committee.
 - b. **The Debtors** – Except (i) as provided in paragraph 18(a) above and (ii) any Filings (including but not limited to, Filings, Requests for Relief, objections, responses or other pleadings or documents filed with the Bankruptcy Court, or orders of the Bankruptcy Court resulting therefrom) by parties other than the Debtors (the “**Excluded Service Parties**”), the Debtors shall be responsible for serving all their Filings, Requests for Relief and all entered orders upon the parties listed on the Special Notice List and any other parties who are not receiving automatic service through the ECF System. Such service shall be by e-mail unless a party opts out of e-mail service pursuant to paragraph 17(b) herein, or submits a written request to counsel for the Debtors for a hard copy of the document sought. Furthermore, the Debtors shall not be responsible for serving parties who receive automatic service through the ECF system, unless a written request for a paper copy of the document sought is received by counsel for the Debtors. The Excluded Service Parties shall be responsible for serving their own respective Filings, Requests for Relief and other documents upon the Special Notice List.

- c. All documents required to be served by the Debtors may be served by GCG subject to the entry of an “Order Appointing The Garden City Group, Inc. as Noticing, Balloting and Claims Agent”. Upon completion of service, GCG shall file a certificate of service with this Court stating that service was made to “all parties on the Special Notice List” and specifically listing all parties served, which shall include the parties served electronically through the ECF System (the “**Agent Certificate**”). The Certificate of Service requirement set forth in Local Rule 9013-3(e) shall be satisfied by the subsequent filing of the Agent Certificate. Additionally, GCG shall be responsible for remitting the notice of commencement of these Chapter 11 Cases and the initial meeting of creditors under Section 341(a) of the Bankruptcy Code to all applicable parties.

C. Electronic Service

19. The Debtors also request that this Court authorize and allow service of documents by electronic mail in order to further reduce the administrative and financial burden of providing notice to the Debtors’ voluminous number of creditors and other parties in interest. Electronic service will be the fastest, most convenient and most economical way to serve notice on those who may be entitled to notice. Moreover, Section C of the Case Management Procedures contains provisions that the Debtors believe will ensure that the electronic service is efficient and effective.

BASIS FOR RELIEF

20. Pursuant to Bankruptcy Rule 2002, the Debtors, the U.S. Trustee and all creditors are entitled to notice by mail of proceedings in these Chapter 11 Cases. Nonetheless, the form and manner of notice set forth above are within this Court’s authority to order. Bankruptcy Rule 2002(m), which also gives this Court discretion to enter orders regulating notice, provides that this Court may designate the scope, form, and manner of notices except as otherwise provided under the Bankruptcy Rules. “This Court may from time to time enter orders designating the matters in respect to which, the entity to whom, and the form and manner in which notices shall be sent except as otherwise provided by these rules.” Fed. R. Bankr. P. 2002(m). See also In re Siegler Bottling Co., 65 B.R. 117, 119 (Bankr. S.D. Ohio 1986) (recognizing that the Bankruptcy

Rules generally authorize limitation of the notices to be sent to certain claimants); In re Southland Supply, Inc., 657 F.2d 1076, 1081 (9th Cir. 1981) (notice of a proposed sale, compromise, or settlement to an authorized creditors committee and to any creditors who file a request to receive all notices is adequate); Alan N. Resnik, et al., COLLIER ON BANKRUPTCY, 15th ed. Revised) ¶200.02[2]) (“Whether by local rule or otherwise, in most larger cases the ‘notice to all’ provision . . . is restricted”).

21. In addition, the notices procedures outlined in this Motion comport with all applicable Bankruptcy Rules, including Bankruptcy Rule 2002(i), which specifically provides in part that notices of all matters should be provided to any official committees, and Bankruptcy Rule 2002(m), allowing this Court to limit the parties entitled to receive notice and the manner of such notice and Local Rule 9013-3. This Court has granted similar motions seeking to establish notice procedures and to limit service to those on a specified list. See e.g., In re Milacron Inc., Case No. 09-11235 (JVA) (Bankr. S.D. Ohio March 12, 2009); In re The Wornick Company, Case No. 08-16054 (JVA) (Bankr. S.D. Ohio Feb. 15, 2008); In re Eagle Picher Holdings, Inc., Case No. 05-12601 (JVA) (Bankr. S.D. Ohio May 19, 2005); In re Huff Corporation, Case No. 04-39148 (LSW) (Bankr. S.D. Ohio Nov. 18, 2004); In re Techneglas, Inc., Case No. 04-63788 (JEH) (Bankr. S.D. Ohio Sep. 18, 2004).

22. The Debtors believe that, for several reasons, it is necessary and appropriate to adopt the procedures proposed herein. First, providing notice of all matters in these cases to all of the parties who would otherwise be entitled to notice would actually delay the provision of notices in these cases and would be unjustifiably burdensome and uneconomical. It also would place an enormous administrative burden on the Debtors’ estates and would impede the consummation of transactions, negotiation of settlements, and the granting of other relief that

may be advantageous to the estates and their creditors. Furthermore, providing notice of all matters to all of the entities otherwise entitled to notice of such matters would unnecessarily increase the costs of administering these cases and, in many instances, delay service to these institutions.

23. Further, the requested relief will reduce the burden, complication, delay, and cost to the Debtors' estates associated with administering these cases and providing notice of proceedings in these cases. The Debtors believe that the proposed notice procedure will mitigate the administrative burden that would otherwise be imposed upon the estates without diminishing creditor participation.

24. With respect to the hearing procedures, the Debtors believe that the relief requested is necessary due to the high volume of pleadings expected to be filed in these Chapter 11 Cases. The special hearing procedures will help to organize the docket and will permit regularly scheduled hearings at which this Court may address multiple matters in an efficient manner, thereby minimizing the burden on this Court and time and expense to the Debtors' estates and other parties in interest. The proposed hearing procedures will also provide certainty to all parties as to when motions and applications must be filed to be heard at a respective Omnibus Hearing.

WAIVER OF MEMORANDUM OF LAW

25. This Motion includes citations to the applicable authorities and a discussion of their application to this Motion. Accordingly, the Debtors respectfully submit that such citations and discussion satisfy the requirement that the Debtors submit a separate memorandum of law in support of this Motion pursuant to Local Bankruptcy Rule 9013-1(a).

NOTICE

26. No trustee, examiner or creditors' committee has been appointed in these Chapter 11 Cases. The Debtors have provided notice of this Motion to: (i) the Office of the United States Trustee for the Southern District of Ohio; (ii) counsel to the administrative agent for the Debtors' prepetition lenders; (iii) counsel to the administrative agent for the Debtors' proposed debtor-in-possession lenders; (iv) counsel to Wynnchurch; (v) the creditors listed on the Debtors' consolidated list of thirty largest unsecured creditors, as filed with the chapter 11 petitions; (vi) all parties asserting a security interest in the assets of the Debtors to the extent reasonably known to the Debtors; and (vii) any governmental unit listed in Local Rule 5003-1(d). In light of the nature of the relief requested, the Debtors submit that no further notice is required or needed under the circumstances. **Please take notice that the Debtors have filed a Motion for an Expedited Hearing to consider First Day Motions and Applications, including the foregoing. The Debtors shall serve notice of the objection deadline and expedited hearing date pursuant to further order(s) of this Court.**

NO PRIOR REQUEST

27. No prior motion for the relief requested herein has been made to this or any other Court.

WHEREFORE, the Debtors respectfully request that this Court enter the Order, substantially in the form attached hereto as Exhibit B, (a) establishing certain notice, case management and administrative procedures in the Debtors' Chapter 11 Cases and (b) granting such further relief as is just and proper.

Dated: May 8, 2009
Cincinnati, OH

Respectfully submitted,

LATHAM & WATKINS LLP

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Stephen R. Tetro II (pro hac vice motion pending)
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- and -

FROST BROWN TODD LLC

By: /s/ Ronald E. Gold
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**PROPOSED ATTORNEYS FOR DEBTORS
AND DEBTORS-IN-POSSESSION**

EXHIBIT A

Notice, Case Management and Administrative Procedures

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

In re) Chapter 11
)
) Case No. 09-12869 (JVA)
SENCORP, et al.,¹) (Joint Administration Requested)
)
) Honorable J. Vincent Aug, Jr.
Debtors.)
)
)

NOTICE, CASE MANAGEMENT, AND ADMINISTRATIVE PROCEDURES

These notice, case management, and administrative procedures (the “**Case Management Procedures**”) have been approved by the United States Bankruptcy Court for the Southern District of Ohio (the “**Court**”) for the Chapter 11 Cases of the above-captioned debtors and debtors in possession (the “**Debtors**”) pursuant to the motion for entry of an order establishing certain notice, case management, and administrative procedures (the “**Motion**”). This Court approved the Case Management Procedures by order dated _____, 2009, entitled “Order Establishing Certain Notice, Case Management and Administrative Procedures [Docket No. ___]” (the “**Order**”).

A copy of the Order can be obtained by: (a) accessing the PACER System (for parties with a PACER Id. No.), via this Court’s website at <http://www.ohsb.uscourts.gov>; (b) for no charge by accessing the website of the Debtors’ claims, balloting and notice agent, The Garden City Group, Inc. (“**GCG**”), located at: <http://www.sencorp-reorg.com>; or (c) contacting the Debtors’ counsel.

¹ The Debtors in these Chapter 11 cases are: SENCORP, Senco Products, Inc., Senco Export, Inc., SenSource Global Sourcing, LLC, TyRex, LLC, Global Fastening Solutions, LLC, Agrifast, LLC, Nexicor, LLC, Omnifast, LLC, S C FINANCIAL, INC., Senco International, Inc., Sentron Medical, Inc., and Gregg Laboratories, Inc.

The Bankruptcy Code, the Bankruptcy Rules and the Local Rules shall govern all matters in these Chapter 11 Cases, except as revised by these case management procedures. Terms not defined herein or in the Motion shall be as defined in the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules.

The Case Management Procedures for filing requests for relief and responses related thereto shall be as follows:

A. Omnibus Hearings

1. **Conducting Omnibus Hearings** – Unless otherwise ordered by this Court, this Court shall only conduct regular, monthly omnibus case management hearings in this case, as scheduled from time to time by this Court (the “**Omnibus Hearings**”). Unless otherwise ordered by this Court for good cause shown, all matters will be heard at the Omnibus Hearings. No less than two (2) business days prior to any scheduled Omnibus Hearing, the Debtors will file with this Court an agenda of matters to be heard at the respective Omnibus Hearing, which may be subsequently modified up to and including the hearing date.
2. **Scheduling** – This Court shall schedule hearings on all motions, pleadings, requests for relief, or other materials that are required to be scheduled for hearing. Unless otherwise determined by this Court, such hearings shall be scheduled to be heard at the next Omnibus Hearing that is at least twenty (20) calendar days after such motions, pleadings, applications, or other requests for relief are filed and served.
3. **Expedited Hearings** – Notwithstanding any procedure herein, nothing herein shall restrict an entity from requesting an expedited hearing pursuant to Local Rule 9073-1.
4. **Initial Omnibus Hearings** – This Court has set the following dates and times as the first three Omnibus Hearings:
 - a) ___:___ a.m./p.m. on the ___ day of _____, 2009
 - b) ___:___ a.m./p.m. on the ___ day of _____, 2009
 - c) ___:___ a.m./p.m. on the ___ day of _____, 2009
5. **Future Hearings** – At or before the last Omnibus Hearing scheduled above, the Debtors shall propose dates for additional Omnibus Hearings to be scheduled, which Omnibus Hearings may be scheduled by this Court. Entities may also contact the Debtors’ undersigned counsel for information concerning future Omnibus Hearings that have been scheduled by this Court.

B. Filing and Notice Procedures

1. **Procedures Established for All Court Filings** – All documents filed in these Chapter 11 Cases, including but not limited to all notices, motions, applications, and other requests for relief, all briefs, memoranda, affidavits, declarations, and other documents filed in support of such papers seeking relief (collectively, the “**Requests for Relief**”) and all objections and responses to such Requests for Relief (collectively, the “**Objections**,” and together with the Requests for Relief and all other filed documents, the “**Court Filings**”) shall be filed with this Court or other applicable court and served in accordance with the notice procedures set forth herein.
2. **Requests for Relief** – Absent extreme exigent circumstances, any Request for Relief, together with a notice of opportunity to object and notice of hearing shall be filed and served at least twenty (20) days prior to the hearing on the respective motion.
3. **Objections** – Any Objection to Request for Relief must be filed within fifteen (15) days of service of the motion or three (3) Business Days prior to the hearing date for which the Requested Relief is scheduled to be heard by this Court, whichever is earlier. The Debtors or any other parties in interest may file a reply to any Objection to a Request for Relief up to and including the date of the scheduled hearing on the matter.
4. **Definition of Entities Entitled to Service (the “Special Notice List”)** – Other than the matters or proceedings referred to in Bankruptcy Rules 2002(a)(1), (2), (4), (5) and (7) and (b), (d), and (f), and 7004, all Court Filings, including but not limited to, every motion, application, complaint, objection, notice, brief, memorandum, affidavit, declaration, order or other writing filed in these cases (but excluding proofs of claim) need to be served only upon:
 - a) any entity against whom direct relief is sought in such matter or proceeding, such as the nondebtor party to an executory contract or unexpired lease that is being assumed or rejected or entities asserting interests in property being sold;
 - b) the parties then listed on the Special Notice List, initially in the form of Annex A attached hereto; and
 - c) other parties in interest that formally request notice according to the procedures set forth herein.
5. **Addition to Special Notice List – Rule 2002 Requests** – Subject to paragraph 5(b) below, all parties in interest have the opportunity to have their names and addresses placed on the Special Notice List by both filing with this Court (in accordance with this Court’s ECF Procedures) and serving on counsel for the Debtors, a formal request to be placed thereon, which request shall include (a) the requesting party’s name, address, telephone number and the name and title of the

appropriate individual to receive notices if the requesting party is not an individual, (b) facsimile number and (c) e-mail address.

- a) **Filing Requests for Documents Requires E-mail Address** – Subject to paragraph 5(b) below, a request for service of papers pursuant to Bankruptcy Rule 2002 and/or 9007, (each, a “**2002 Notice Request**”) filed with this Court in accordance with ECF Procedure 9 and Local Rules 5005-1 and 5005-4, shall be deemed proper and such person shall automatically receive electronic notice from the date of such filing in accordance with ECF Procedures 2 and 9 and shall be deemed to consent to such electronic notice and waive any notice by mail or otherwise. Any other party may request notice by non-ECF e-mail by filing with this Court a 2002 Notice Request and serving on counsel to the Debtors to with an appropriate e-mail address.
- b) **Certification Opting Out of E-mail Service** – Any individual or entity filing a 2002 Notice Request who does not maintain (and cannot practicably obtain) an e-mail address and thereafter cannot receive e-mail must include in the 2002 Notice Request a certification to that effect (the “**Certification**”). The Certification shall include a statement certifying that the individual or entity (a) does not maintain an e-mail address and (b) cannot practicably obtain an e-mail address at which the individual or entity could receive service by e-mail.

6. Responsibility for Service

- a) **This Court** – The Clerk of Court shall be responsible for serving copies of any orders it has entered solely upon (i) counsel for the Debtors, (ii) the United States Trustee, and (iii) any creditors’ committee.
- b) **The Debtors** – Except (i) as provided in paragraph 6(a) above and (ii) as to any Court Filings (including but not limited to, requests for relief, objections, responses or other pleadings or documents filed with the Bankruptcy Court, or orders of the Bankruptcy Court resulting therefrom) by parties other than the Debtors (the “**Excluded Service Parties**”), the Debtors shall be responsible for serving all their Court Filings and all entered orders upon the parties listed on the Special Notice List and any other parties enumerated under paragraph 4 herein who are not receiving automatic service through the ECF System. Such service shall be by e-mail unless a party opts out of e-mail service pursuant to paragraph 5(b) herein, or submits a written request to counsel for the Debtors for a hard copy of the document sought. Furthermore, the Debtors shall not be responsible for serving parties who receive automatic service through the ECF system, unless a written request for a paper copy of the document sought is received by counsel for the Debtors. The Excluded Service Parties shall be responsible for serving their own respective Court Filings and other documents upon the Special Notice List.

- c) All documents required to be served by the Debtors may be served by GCG pursuant to the “Order Appointing The Garden City Group, Inc. as Claims, Balloting and Noticing Agent,” entered by this Court on _____, 2009. Within three business days after completion of service, GCG shall file a certificate of service with this Court stating that service was made to “all parties on the Special Notice List” and specifically listing all parties served, which shall include the parties served electronically through the ECF System (the “**Agent Certificate**”). The Certificate of Service requirement set forth in Local Rule 9013-3(e) shall be satisfied by the subsequent filing of the Agent Certificate. In addition, GCG shall be responsible for remitting the notice of commencement of these Chapter 11 Cases and the initial meeting of creditors under Section 341(a) of the Bankruptcy Code to all applicable parties.
7. **Copy of Special Notice List** – A copy of the Special Notice list may be obtained by accessing GCG’s website at: <http://www.sencorp-reorg.com>. Further, a copy of the Special Notice List can also be obtained from the Debtors’ counsel upon request.
8. **Service of Notice** – Unless otherwise required by an order of this Court, all notices in these Chapter 11 Cases may be provided by e-mail in accordance with ECF Procedures or by any other means. In their discretion, unless otherwise ordered by this Court, the Debtors are also authorized to use U.S. Mail and/or overnight delivery, postage prepaid, for purposes of serving papers in these cases.
9. **Applicability of these Procedures** – Nothing herein shall affect the Debtors’ obligation to give notice to all creditors, parties in interest, and, where applicable, equity security holders of the meeting of creditors, the dismissal or conversion of the Debtors’ Chapter 11 Cases to another chapter, the time fixed to accept or reject a proposed modification of a plan, the time fixed for filing proofs of claim as required by Bankruptcy Rule 2002(a), the time fixed for filing objections to and the hearing on the disclosure statement and the plan required by Bankruptcy Rule 2002(b), or entry of an order confirming the plan required by Bankruptcy Rule 2002(d), (f) and 7004(h).

C. Service by E-mail

Form of Documents Served by E-mail – All documents served by e-mail shall provide either (i) an attached copy of the entire document, including the proposed form(s) of order and any exhibits, attachments or other materials in “.pdf” format, readable by Adobe Acrobat or other equivalent document reader program commonly available without cost or (ii) a link to access the entire document from the Claims’ Agent’s website.

ANNEX A

Special Notice List

Advanced Facilities Inc.
Attn: Office Manager
4690-S Interstate Drive
Cincinnati, OH 45246
Fax: 513-682-2145
Phone: 513-942-9900
Top 30 Creditor

Allied Irish Banks, P.L.C (“AIB”)
601 S. Figueroa Street
Suite 4650
Los Angeles, CA 90017
Fax: 213-593-4766
Tel: 213-593-4759
mia.bolin@aibla.com
Secured Party

Baker & Daniels
Scott A. Semenek
311 South Wacker Drive
Suite 4400
Chicago, IL 60606
Fax: 312-212-6501
Tel: 312-212-6553
Counsel to the Board of Directors

Basso Industry Corp.
President
No. 24, 36th Road
Taichung Industrial Zone
Taichung R.O.C. China
Taiwan
Fax: 011-886-4-23598880
Tel: 886-4-23500628
Top 30 Creditor

Butler County Department of Job & Family
Services
Attn: Investigations & Recovery Division
315 High St.
PO Box 4000
Hamilton, OH 45012-4000
Fax: 513-887-4334
Tel: 513-887-4082
clarkr02@odjfs.state.oh.us
Gov’t Agency (per LR 5003)
Central Wire-Union
PO Box 7777-W2450
Philadelphia, PA 19175
Top 30 Creditor

China Staple Enterprise Corp (Taiwan)
N158 No. Tai Min Road, Wu Jih Hsiang
Taichung Gsien China
CN
Fax: 011-886-04-23354374
Top 30 Creditor

Chong Cheng Xing
Chong Cheng Xing Ye Co., Ltd
Attn: Company President
Taiwan Business Bank, Taichung Branch
Taichung City
CHN
Fax: 011-886-49-2250463
Top 30 Creditor

CIT Communications Finance Corporation
1 CIT Drive
Livingston, NJ 07039
Fax: 800-831-6405
Tel: 610-444-8722
Secured Party

City of Mason
6000 Mason-Montgomery Road
Mason, OH 45040
Fax: 513 229-8531
Tel: 513-229-8510
administration@masonoh.org
Gov't Agency (per LR 5003)

City Of Xenia
101 N. Detroit Street
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Fax: 937 374-6055
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law@ci.xenia.oh.us
Gov't Agency (per LR 5003)

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MML

Corus International Trading Ltd
30 Millbank
London SW1P 4WY
UK
Fax: 011-44 20 7717 4455
Tel: 44 (0) 20 7717 4444
Top 30 Creditor

De Poan Pneumatic
249 No. 81 Museum Road
Ba-Li Shiang
Taipei Hsien
CHN
Fax: 011-886-2-2619-5777
Tel: 886-2-2619-5619
service@depoan.com
Top 30 Creditor

Deench Corp.
Attn: Company President
No 18. 2nd Industrial Road
Tainan Taiwan
CH
Fax: 011-886 6 384 01 01
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Top 30 Creditor

Dept. of Labor
200 Constitution Ave.
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Gov't Agency

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Top 30 Creditor

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Secured Party

Gerrards Limitada
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CHN
Top 30 Creditor

IBM Credit LLC
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Secured Party

Internal Revenue Service
Insolvencies
PO Box 21126
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Gov't Agency (per LR 5003)

Internal Revenue Service
District Director
Insolvency Section
P.O. Box 1579
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Fax: 513-263-3214
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Gov't Agency (per LR 5003)

Internal Revenue Service
300 N. Los Angeles Street
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Gov't Agency (per LR 5003)

Internal Revenue Service
Centralized Insolvency Operation
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Fax: 502-572-2203
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Top 30 Creditor

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Top 30 Creditor

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Top 30 Creditor

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Ohio Department of Job and Family
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US Trustee (per LR 5003)

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FKA Ohio Bureau of Employment Services
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Gov't Agency (per LR 5003)

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Columbus, OH 43215-0567
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Tel: 614-466-6600
Gov't Agency (per LR 5003)

Ohio Department of Job and Family
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Tel: 614-466-3508
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Ohio Bureau of Workers' Compensation
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Ohio Department of Taxation
Attn: Bankruptcy Division
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Columbus, OH 43266-0030
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Tel: 614-752-6864
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U.A.E.
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Secured Party

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SEC - Chicago Regional Office
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Securities & Exchange Commission
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100 F Street, NE
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SEC (per Rule 2002)

Securities and Exchange Commission
Los Angeles Regional Office
Rosalind Tyson, Regional Director
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SEC

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San Francisco Regional Office
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SEC

Senco Latin America
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Phone: 011-574-372-1570
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Tonic Ind. Centre
Kowloon
HKG
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Tel: 212-563 0262
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Top 30 Creditor

Sterling Steel LLC
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Fax: 417-358-4805
Top 30 Creditor

Techtronic Industries Co. Ltd.
Attn: Company President
Units B-F, 24/F., CDW Bldg.
388 Castle Peak Road
Tsuen Wan, NT
HKG
Fax: 011-852-2413 5971
Tel: 011-852-2402 6888
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Tecnofil S.P.A.
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Gottolengo, ITALY ITA
Fax: +39 030 9517571
Phone: +39 030 9517655
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Top 30 Creditor

The Garden City Group, Inc.
Ken Freda
105 Maxess Rd
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Fax: 631-940-6554
ken.freda@gardencitygroup.com
MML

Tianjin Xian Tong Juxiang Metal Man. Co,
Ltd.
Attn: Company President
Daming Road, Yingxiang Street
Xiqing District
Tianjin
CHN
Fax: 011-86 (222) 779-5197
Tel: 222-779-8583
Top 30 Creditor

Trim International Inc (HK)
Attn: Company President
21F, No. 508, Sec. 5
Chung Hsiao East Road Sec 5
Taipei
Taiwan ROC China
Fax: 011-866-2 759-6620
Top 30 Creditor

U.S. Department of Justice
U. S. Attorney General
Main Justice Building Room 5111
10th & Constitution Ave. N.W.
Washington, DC 20530
Fax: 202-514-4507
Tel: 202-514-2001
Gov't Agency (per LR 5003)

U.S. Department of Justice
U. S. Attorney - Cincinnati
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Cincinnati, OH 45202
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Gov't Agency (per LR 5003)

U.S. Department of Justice
Eric Holder, U.S. Atty Genl
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001
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askdoj@usdoj.gov
Gov't Agency (per Rule 2002)

U.S. Equal Employment Opportunity
Commission
131 M Street, NE
Washington, DC 20507
Fax: 202-663-4900
Gov't Agency

United States Customs
610 S. Canal Street
Room 900
Chicago, IL 60607
Fax: 312-886-4921
Tel: 312-983-900
Gov't Agency (per LR 5003)

US Bancorp
Chief Risk Officer
1310 Madrid Street
800 Nicollet Mall
Marshall, MN 56258
Fax: 612-303-0782
Tel: 651-466-3000
Richard.Hidy@usbank.com
Secured Party

US Environmental Protection Agency
Richard L. Nagle, Bankruptcy Contact
US EPA Region 5, Mail Code: C-14J
77 W. Jackson Blvd.
Chicago, IL 60604
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CA 90280

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Buyer's counsel

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Wells Fargo Financial Leasing, Inc.
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Secured Party

Worthen Industries Inc
PO Box 847125
Boston, MA 02284-7125
Fax: 603-888-3059
Top 30 Creditor

Xingya Cincinnati
No. 88 Liu Tai Road
Liuhe Town
Taicang City 215431
Fax: 011-86-512-53613958
Tel: 0086-512-53612369
Top 30 Creditor
CHN

EXHIBIT B

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

In re) Chapter 11
)
) Case No. 09-12869 (JVA)
SENCORP, et al.,) (Joint Administration Requested)
)
) Honorable J. Vincent Aug, Jr.
Debtors.)
)

**ORDER ESTABLISHING CERTAIN NOTICE,
CASE MANAGEMENT AND ADMINISTRATIVE PROCEDURES**

Upon consideration of the motion (the "**Motion**")¹ of the Debtors² for entry of an order establishing certain notice, case management and administrative procedures for these Chapter 11 Cases; and it appearing that the relief requested is in the best interests of the Debtors' estates,

¹ Capitalized terms used but not defined herein shall have the same meanings ascribed to them in the Case Management Procedures and the Motion.

² The Debtors in these Chapter 11 cases are: SENCORP, Senco Products, Inc., Senco Export, Inc., SenSource Global Sourcing, LLC, TyRex, LLC, Global Fastening Solutions, LLC, Agrifast, LLC, Nexicor, LLC, Omnifast, LLC, S C FINANCIAL, INC., Senco International, Inc., Sentron Medical, Inc., and Gregg Laboratories, Inc.

their creditors, and other parties in interest; and it appearing that this Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and it appearing that this Motion is a core proceeding pursuant to 28 U.S.C. § 157; and adequate notice of the Motion and opportunity for objection having been given, with no objections or requests for hearing having been filed, or all objections having been overruled, as the case may be; and it appearing that no other notice need be given; and after due deliberation and sufficient cause therefor, it is hereby:

1. ORDERED that the Motion is granted and the case management and notice procedures described in this Order are approved; and it is further

2. ORDERED that the Case Management Procedures contained in Exhibit A attached to the Motion are hereby approved in all respects and shall govern all applicable aspects of these Chapter 11 Cases. The Bankruptcy Code, Bankruptcy Rules and Local Bankruptcy Rules shall continue to apply to these Chapter 11 Cases, except as revised by the Case Management Procedures, where permitted by such Code and Rules; and it is further

3. ORDERED that nothing herein shall affect the Debtors' obligation to give notice to all creditors, parties-in-interest, and, where applicable, equity security holders of the meeting of creditors, of the dismissal or conversion of the Debtors' Chapter 11 Cases to another chapter, the time fixed to accept or reject a proposed modification of a plan, the time fixed for filing proofs of claim as required by Bankruptcy Rule 2002(a), the time fixed for filing objections to and the hearing on the disclosure statement and the plan required by Bankruptcy Rule 2002(b), or entry of an order confirming the plan required by Bankruptcy Rule 2002(d), (f) and 7004; and it is further;

4. ORDERED that, in accordance with ECF Procedure 9, no service, whether by e-mail or otherwise, shall be required to be made upon those parties receiving electronic service via this Court's Electronic Case Filing system; and it is further

5. ORDERED that, within three business days after completion of service, GCG shall file a certificate of service with this Court stating that service was made to "all parties on the Special Notice List" and specifically listing all parties served including those parties served electronically via ECF (the "**Agent Certificate**"). The Certificate of Service requirement set forth in Local Rule 9013-3(e) shall be satisfied by the Agent Certificate; and it is further

6. ORDERED that the Debtors are authorized and empowered to take all actions and execute all documents or refrain from any action necessary or appropriate to implement the relief granted in this Order; and it is further

7. ORDERED that, notwithstanding the possible applicability of Bankruptcy Rules 6004(g), 7062, 9014, or otherwise, the terms and conditions of this Order shall be effective and enforceable upon entry; and it is further

8. ORDERED that this Court shall retain jurisdiction over all matters arising from or related to the interpretation, implementation and enforcement of this Order;

SO ORDERED.

###

ANNEX A

Special Notice List

Advanced Facilities Inc.
Attn: Office Manager
4690-S Interstate Drive
Cincinnati, OH 45246
Fax: 513-682-2145
Phone: 513-942-9900
Top 30 Creditor

Allied Irish Banks, P.L.C (“AIB”)
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Fax: 213-593-4766
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mia.bolin@aibla.com
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Baker & Daniels
Scott A. Semenek
311 South Wacker Drive
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Fax: 312-212-6501
Tel: 312-212-6553
Counsel to the Board of Directors

Basso Industry Corp.
President
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Taichung Industrial Zone
Taichung R.O.C. China
Taiwan
Fax: 011-886-4-23598880
Tel: 886-4-23500628
Top 30 Creditor

Butler County Department of Job & Family
Services
Attn: Investigations & Recovery Division
315 High St.
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Tel: 513-887-4082
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Gov't Agency (per LR 5003)
Central Wire-Union
PO Box 7777-W2450
Philadelphia, PA 19175
Top 30 Creditor

China Staple Enterprise Corp (Taiwan)
N158 No. Tai Min Road, Wu Jih Hsiang
Taichung Gsien China
CN
Fax: 011-886-04-23354374
Top 30 Creditor

Chong Cheng Xing
Chong Cheng Xing Ye Co., Ltd
Attn: Company President
Taiwan Business Bank, Taichung Branch
Taichung City
CHN
Fax: 011-886-49-2250463
Top 30 Creditor

CIT Communications Finance Corporation
1 CIT Drive
Livingston, NJ 07039
Fax: 800-831-6405
Tel: 610-444-8722
Secured Party

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Gov't Agency (per LR 5003)

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MML

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Top 30 Creditor

De Poan Pneumatic
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Taipei Hsien
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Fax: 011-886-2-2619-5777
Tel: 886-2-2619-5619
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Top 30 Creditor

Deench Corp.
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Tel: 011-886 6 384 01 23
Top 30 Creditor

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contact-ocfo@dol.gov
Gov't Agency

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Gerrards (Comercial Offshare de Macau)
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Ed Chong Fok Comm. Center, Macau
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Top 30 Creditor

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300 N. Los Angeles Street
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Internal Revenue Service
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Top 30 Creditor

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Top 30 Creditor

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Ohio Department of Job and Family
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