

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

In re	)	Chapter 11
	)	
SENCORP, <u>et al.</u> , <sup>1</sup>	)	Case No. 09-12869
	)	
	)	Jointly Administered
	)	
Debtors.	)	Honorable J. Vincent Aug, Jr.
	)	

**NOTICE OF MOTION SCHEDULING AN EXPEDITED HEARING ON DEBTORS’  
MOTION ESTABLISHING BIDDING AND AUCTION PROCEDURES RELATED TO  
THE POTENTIAL SALE OF ALL OF THE DEBTORS’ ASSETS**

PLEASE TAKE NOTICE OF THE FOLLOWING:

1. On May 8, 2009, the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) filed the Motion Pursuant to 11 U.S.C. §§ 105(A), 363, 365, and Bankruptcy Rules 2002, 6004, 6006 For (I) Entry Of An Order (A) Establishing Bidding And Auction Procedures Related To The Sale Of All Of The Debtors’ Assets; (B) Approving Bid Protections For The Sale Of The Debtors’ Assets; (C) Scheduling An Auction And Sale Hearing For The Sale Of The Debtors’ Assets; (D) Establishing Certain Notice Procedures For Determining Cure Amounts For Executory Contracts And Leases To Be Assigned; And (E) Granting Certain Related Relief; And (II) Entry Of An Order (A) Approving The Sale Of The Debtors’ Assets Free And Clear Of All Liens, Claims, Encumbrances And Interests; And (B) Authorizing The Assumption And Assignment Of Certain Executory Contracts And Unexpired

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<sup>1</sup> 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.

Leases (the “**Bidding Procedures/Sale Motion**”) and requested an expedited hearing on the Bidding Procedures/Sale Motion.

2. On **May 27, 2009 at 10:00 a.m. (prevailing Eastern time)**, the Honorable J. Vincent Aug, Jr., United States Bankruptcy Judge, will conduct an expedited hearing at the United States Bankruptcy Court, 221 E. Fourth Street, Atrium Two, Suite 800, Cincinnati, Ohio 45202, with respect to the Bidding Procedures Motion (the “**Bidding Procedures Hearing**”).

3. **YOUR RIGHTS MAY BE AFFECTED.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

4. If you do not want this Court to grant the relief requested in the Bidding Procedures Motion, or if you want the Court to consider your views on the Bidding Procedures Motion, then you must: (A) **no later than May 22, 2009 at 4:00 p.m. (prevailing Eastern time)** (the “**Objection Deadline**”), file a written objection (the “**Objection**”) with the United States Bankruptcy Court for the Southern District of Ohio (the “**Bankruptcy Court**”), 221 East Fourth Street, Atrium Two, Suite 800, Cincinnati, Ohio 45402, and serve the Objection on the following parties such as to be received by the Objection Deadline: (i) Latham & Watkins LLP, Counsel for the Debtors, Sears Tower, Suite 5800, 233 S. Wacker Drive, Chicago, Illinois 60606, (Attn: Stephen R. Tetro II, Esq.); (ii) Frost Brown Todd LLC, Co-Counsel for the Debtors, 2200 PNC Center, 201 East Fifth Street, Cincinnati, Ohio 45202, (Attn: Ronald E. Gold, Esq.); (iii) Office of the United States Trustee for the Southern District of Ohio, 36 East Seventh Street, Suite 2030, Cincinnati, Ohio 45202, (Attn: Monica Kindt, Esq.); (iv) Katten Muchin Rosenman LLP, counsel for the administrative agent for the Debtors’ prepetition Lenders and proposed debtor-in-possession Lenders, 525 West Monroe Street, Chicago, Illinois

60661, (Attn: John Sieger, Esq. and Peter Siddiqui, Esq.); (v) Global Fastening Solutions, 4270 Ivy Pointe Boulevard, Cincinnati, Ohio 45245, (Attn: Cliff Mentrup, Esq.) and SENCORP, 4270 Ivy Pointe Boulevard, Cincinnati, Ohio 45245, (Attn: Marie Boyle, Esq.); (vi) upon all parties on the Special Notice List established in these Chapter 11 Cases pursuant to the Order Establishing Certain Notice, Case Management and Administrative Procedures (Docket No. 52), which list may be obtained by accessing The Garden City Group, Inc.'s website at: <http://www.sencorp-reorg.com>; and, (vii) those parties who have filed a notice of appearance and request for service of pleadings; and (B) attend the Bidding Procedures Hearing.

5. **PLEASE TAKE FURTHER NOTICE THAT**, anyone who wishes to obtain a complete copy of the Bidding Procedures/Sale Motion can do so by either (a) visiting the website of the Debtors' Claims Agent, The Garden City Group, Inc., located at: <http://www.sencorp-reorg.com> or (b) by emailing your request to: Max Eisenberg at [max.eisenberg@lw.com](mailto:max.eisenberg@lw.com).

6. If you or your attorney do not take these steps, the Bankruptcy Court may decide that you do not oppose the relief sought in the Bidding Procedures Motion and may enter an order granting that relief pursuant to LBR 9013-1(d).

Dated: May 13, 2009  
Cincinnati, Ohio

Respectfully submitted,

**LATHAM & WATKINS LLP**

Josef S. Athanas  
Stephen R. Tetro II  
Sears Tower, Suite 5800  
233 South Wacker Drive  
Chicago, Illinois 60606-6401  
Telephone: (312) 876-7700  
Facsimile: (312) 993-9767

*- and -*

**FROST BROWN TODD LLC**

By: /s/ Ronald E. Gold

Ronald E. Gold, Esq. (0061351)

Beth A. Buchanan, Esq. (0068430)

2200 PNC Center

201 East Fifth Street

Cincinnati, Ohio 45202

Telephone: (513) 651-6800

Facsimile: (513) 651-6981

Email: rgold@fbtlaw.com

Email: bbuchanan@fbtlaw.com

**ATTORNEYS FOR DEBTORS  
AND DEBTORS-IN-POSSESSION**