



chapter 11 estate of IPofA Shreveport, the “Estates”), and IPofA Shreveport Industrial Park, LLC (“IPofA Shreveport” and, collectively with the 1031 Debtors, the “Debtors”), filed the Second Amended Plan of Reorganization of Gerard A. McHale, Jr., as Chapter 11 Trustee for each of the 1031 Debtors, and IPofA Shreveport Industrial Park, LLC dated August 11, 2009 (as may be amended, supplemented or otherwise modified, the “Plan”) as described in the Second Amended Disclosure Statement pursuant to Section 1125 of the Bankruptcy Code with respect to the Plan dated August 11, 2009 (the “Disclosure Statement”), with the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”). Capitalized terms used in this Notice, which are not defined herein, have the meanings set forth in the Plan.

**PLEASE TAKE FURTHER NOTICE** that on August 18, 2009, the Bankruptcy Court approved the Disclosure Statement for use by the Proponents in soliciting acceptances or rejections of the Plan from those holders of impaired Claims who are (or may be) entitled to vote on the Plan.

**PLEASE TAKE FURTHER NOTICE** that the Confirmation Hearing will be held before the Honorable Martin Glenn, United States Bankruptcy Judge, in the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Courtroom 501, New York, New York 10004, on **October 7, 2009 at 11:00 a.m.** (Prevailing Eastern Time) or as soon thereafter as counsel can be heard, to consider the entry of an order confirming the Plan within the meaning of section 1129 of title 11 of the United States Code (as amended, the “Bankruptcy Code”). The Confirmation Hearing may be continued from time to time by way of announcement of such continuance in open court, without further notice to parties in interest.

**PLEASE TAKE FURTHER NOTICE** that copies of the Disclosure Statement, the Plan (including the Plan Funding Party Settlement Agreements) and the Order approving the Disclosure Statement are on file with the Bankruptcy Court and may be examined by any party

in interest at the Office of the Clerk of the Court, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004 during normal business hours. In addition, copies of the Disclosure Statement, the Plan (including the Plan Funding Party Settlement Agreements) and the Order approving the Disclosure Statement may also be obtained by any party in interest from the Chapter 11 Trustee's website at <http://trustee1031taxgroup.com/> or upon written request to Golenbock Eiseman Assor Bell & Peskoe LLP, Attn.: Michael S. Weinstein, Esq., 437 Madison Avenue, 35<sup>th</sup> Floor, New York, New York 10022.

**PLEASE TAKE FURTHER NOTICE** that at the Confirmation Hearing, the Chapter 11 Trustee will seek approval of the Plan Funding Party Settlement Agreements pursuant to Bankruptcy Rule 9019(a), Section 105(a) of the Bankruptcy Code, and, with respect to the Lloyd's Settlement Agreement, Section 363 of the Bankruptcy Code. The Chapter 11 Trustee will seek approval of the following Plan Funding Party Settlement Agreements: (i) the AEC Parties Settlement Agreement dated February 17, 2009; (ii) the Allred Settlement Agreement dated January 21, 2009; (iii) the Bennett Settlement Agreement dated February 11, 2009; (iv) the CNA Settlement Agreement dated February 23, 2009; (v) the Dashiell Settlement Agreement dated February 17, 2009; (vi) the Federal Settlement Agreement dated February 23, 2009; (vii) the KPKB Settlement Agreement dated February 13, 2009; (viii) the Lloyd's Settlement Agreement dated October 22, 2008; (ix) the McCabe Group Settlement Agreement dated September 24, 2008; (x) the Pajonas Settlement Agreement dated June 10, 2009; (xi) the Rosen Settlement Agreement dated March 18, 2009; (xii) the Shefman Settlement Agreement dated March 16, 2009; (xiii) the Twin City Settlement Agreement dated February 23, 2009; and (ix) the Wachovia Settlement Agreement dated May 28, 2009.

**PLEASE TAKE FURTHER NOTICE** that the Disclosure Statement and Plan should be reviewed for a full description of the Plan Funding Party Settlement Agreements.

**PLEASE TAKE FURTHER NOTICE** that the Chapter 11 Trustee intends to file a memorandum of law in support of approval of the Plan Funding Party Settlement Agreements (the “9019 Memorandum”) by September 14, 2009. Once filed, a copy of the 9019 Memorandum will be on file with the Court and may be examined by any party in interest at the Office of the Clerk of the Court, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004 during normal business hours. Once filed, the 9019 Memorandum will also be available to any party in interest upon written request to Golenbock Eiseman Assor Bell & Peskoe LLP, Attn.: Michael S. Weinstein, Esq., 437 Madison Avenue, 35<sup>th</sup> Floor, New York, New York 10022 or from the Chapter 11 Trustee’s website <http://www.trustee1031taxgroup.com/>.

**PLEASE TAKE FURTHER NOTICE** that responses and objections, if any, to confirmation of the Plan and/or approval of the Plan Funding Party Settlement Agreements (each, a “Confirmation Objection”) must (a) be made in writing; (b) comply with the Bankruptcy Code, the Bankruptcy Rules and the Local Rules for the United States Bankruptcy Court for the Southern District of New York (the “Local Rules”); (c) set forth the name of the objector, and the nature and amount of any claim against or interest in the Debtors asserted by the objector; (d) state with particularity the legal and factual bases for the Confirmation Objection; (e) be filed with the Bankruptcy Court; and (f) be served on the following parties (the “Notice Parties”): (i) Golenbock Eiseman Assor Bell & Peskoe LLP, Attn.: Jonathan L. Flaxer, Esq., 437 Madison Avenue, New York, New York 10022, (ii) the Office of the United States Trustee, Attn.: Andrew Velez-Rivera, Esq., 33 Whitehall Street, Suite 2100, New York, NY 10004, and (iii) Cozen O’Connor, Attn.: Mark E. Felger, Esq., 1201 N. Market Street – Ste. 1400, Wilmington, DE

