

- B. Creditors for whom fax numbers were provided by Debtors' counsel or obtained by the USBA were faxed a solicitation letter by the USBA; and,
 - C. Creditors for whom no telephone or fax number could be obtained were sent a solicitation letter via regular US Mail to the addresses provided by Debtors' counsel.
8. Of the 239 creditors who were solicited, the USBA received timely responses from approximately 52 creditors who expressed interest and willingness to serve on a committee. Those 52 creditors represented claims against approximately 12 of the instant debtors. With respect to the remaining fifteen or so related debtors' cases, no creditor responded in a timely fashion.
9. Of the fifty creditors which did respond, the USBA has chosen fifteen creditors to serve on the proposed Omnibus Committee. The proposed Committee members were chosen based on the size of the claims (as reported by Debtors' counsel) as well as upon the different kinds of claims to be represented in these cases.
10. The proposed Omnibus Committee members are:
- a. Omega Metal Treating, Inc.
Attn: Paul Janowski
1883 Commerce Drive
DePere, WI 54115
 - b. RUSAL America Corp.
Attn: Bruce Markowitz
550 Mamaroneck Ave. - Suite 301
Harrison, NY 10528
 - c. BEHR Metals, Inc.
BEHR Iron & Steel, Inc.
Attn: Leland Foecking
1100 Seminary Street
Rockford, IL 61104
 - d. Pechiney World Trade (U.S.A.), Inc.
Attn: Jeffrey A. Jankowski
333 Ludlow Street
Stamford, CT 06902

- e. Jefferson Iron & Metal Brokerage
Attn: Alan J. Dreher
P. O. Box 131449
Birmingham, AL 35213

- f. LandMark Engineering Sciences, Inc.
Attn: Mark D. Augustine
3021 Minot Lane, Suite 200
Waukesha, WI 53188-4453

- g. EPP-MAR Metal Company
Attn: Joseph S. Eppstein
2319 Hartrey Avenue
Evanston, IL 60201

- h. Dana Corporation
Attn: Donald W. Commons
4500 Dorr Street
Toledo, OH 43615

- i. U S Inspection Services
Attn: Dennis Lee
705 Albany Street
Dayton, OH 45408

- j. KM Tool Supply, LTD.
Attn: Wayne Riekkoff
N89W14452 Patrita Dr.
P. O. Box 1270
Menomonee Falls, WI 53051

- k. Kennametal, Inc.
Attn: Dean R. Hoffman
P. O. Box 231
Latrobe, PA 15650

- l. A&W Iron & Metal, Inc.
Jesse Alexandra
7588 Otten Dr.
Kewaskum, WI 53040

- m. HA International LLC
Attn: Dennis Ziegler
630 Oakmont Lane
Westmont, IL 60559

- n. TXU Energy
Attn: Dan Carey/Ken Blenk /Stacy Garner
1717 Main Street, Ste. 17-014
Dallas, TX 75201

- o. Metal Processors, Inc.
Attn: Martin H. Pingel
1010 W. John Beers Road
Stevensville, MI 49127

11. The USBA prays that this Motion should be heard by the Court on the “Omnibus Hearing Date” presently scheduled for 2:00 p. m. on October 4, 2004.

WHEREFORE, these premises considered, the USBA respectfully moves this Honorable Court to enter its Order appointing the aforementioned creditors to serve as an Omnibus Unsecured Creditors Committee for all proper committee purposes and functions in all of these cases. The USBA further prays for such other, different or further relief as may be appropriate.

/s/ Valrey W. Early, III
VALREY W. EARLY, III
United States Bankruptcy Administrator
Northern District of Alabama
Alabama Bar ID ASB-6464-E60V

OF COUNSEL:
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Northern District of Alabama
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Suite 305
Birmingham, Alabama 35203
(205) 714-3826

Citation Corporation, et al.,
04-08130-TOM-11
Unsecured Creditors' Committee
Page 5

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing on counsel for the Debtors, counsel for the proposed Omnibus Unsecured Creditors' Committee, and counsel for the pre- and post-petition lenders to the Debtors, by placing same in the US Mail, postage prepaid and properly addressed this 30th day of September, 2004.

/s/ Valrey W. Early, III
OF COUNSEL
