

BLANK ROME LLP
Attorneys for Debtor
The Chrysler Building
405 Lexington Avenue
New York, NY 10174
(212) 885-5000
Michael Z. Brownstein
Rocco A. Cavaliere
and
One Logan Square
130 N. 18th Street
Philadelphia, PA 19103
Joel C. Shapiro

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	
	:	
CHIYODA AMERICA, INC.,	:	Case No. 09-15059 (AJG)
	:	Chapter 11 Case
Debtor.	:	

**NOTICE OF ENTRY OF ORDER CONFIRMING DEBTOR'S FIRST
AMENDED CHAPTER 11 PLAN OF REORGANIZATION DATED AS OF
OCTOBER 6, 2009 AND CERTAIN DEADLINES RELATING THERETO**

TO ALL PARTIES IN INTEREST IN THE ABOVE-CAPTIONED CHAPTER
11 CASE:

PLEASE TAKE NOTICE THAT:

On November 10, 2009, the United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court") entered an order (the "Confirmation Order") confirming the Debtor's First Amended Chapter 11 Plan of Reorganization dated as of October 6, 2009 (the "Plan"), of Chiyoda America, Inc. (the "Debtors"). Unless otherwise defined in this notice, capitalized terms used in this notice shall have the meanings ascribed to them in the Plan.

The Confirmation Order (including the Plan attached as an exhibit thereto) is available for inspection during regular office hours in the office of the clerk of the Bankruptcy Court at the United States Bankruptcy Court, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004. **The Confirmation Order is also available free of charge on the website of the Debtor's claims and noticing agent, The Garden City Group, Inc. ("Garden City"), at: <http://CAIReorg.com>**

The Confirmation Order provides that the provisions of the Plan and the documents relating to the Plan bind (a) any holder of a Claim against, or equity interest in the Debtor and such holder's respective successors and assigns, whether or not the Claim or equity interest is impaired under the Plan, whether or not such holder has accepted the Plan, and whether or not such holder is entitled to a distribution under the Plan, (b) any and all non-Debtor parties to assumed executory contracts and unexpired leases with the Debtor, (c) any parties that objected to confirmation of the Plan, (d) every other party in interest in the Debtor's chapter 11 case and (e) all parties receiving property under the Plan, and their respective heirs, executors, administrators, successors, or assigns.

DISCHARGE OF DEBTOR AND PERMANENT INJUNCTION

Pursuant to the Plan, all property of the Debtor's estate is vested in the Reorganized Debtor, free and clear of all liens, claims, encumbrance, and interests. Accordingly, except as otherwise provided in the Plan, on the Effective Date of the Plan, all existing Claims against the Debtor shall be discharged. All persons holding such Claims shall be forever precluded and enjoined, pursuant to section 524 of the Bankruptcy Code, from prosecuting or asserting any such discharged Claim against the Debtor.

Furthermore, except as otherwise expressly provided in the Plan, all persons or entities who have held, hold or may hold Claims against or Preconfirmation Equity Interests in the Debtor are permanently enjoined, from and after the Effective Date, from (a) commencing or continuing in any manner any action or other proceeding of any kind on any such Claim or Preconfirmation Equity Interest against the Reorganized Debtor, (b) the enforcement, attachment, collection or recovery by any manner or means of any judgment, award, decree or order against any Reorganized Debtor with respect to such Claim or Preconfirmation Equity Interest, (c) creating, perfecting or enforcing any encumbrance of any kind against Reorganized Debtor or against the property or interests in property of Reorganized Debtor with respect to such Claim or Preconfirmation Equity Interest, (d) asserting any right of setoff, subrogation or recoupment of any kind against any obligation due Reorganized Debtor or against the property or interests in property of Reorganized Debtor with respect to such Claim or Preconfirmation Equity Interest and (e) pursuing any claim released pursuant to the Plan.

DEADLINE FOR FILING REJECTION DAMAGE CLAIMS

If you are a counterparty to an executory contract or unexpired lease that (i) was not listed on the Schedule of contracts to be assumed which was attached to the Assumption Motion filed on October 16, 2009 [Docket No. 70], (ii) was not previously assumed by order of the Bankruptcy Court, or (iii) does not have as its primary purpose the licensing of intellectual property rights by the Debtor from you, then your executory

contract or unexpired lease has or will be rejected by the Debtor as provided in the Plan or applicable court order.¹

IF YOUR EXECUTORY CONTRACT OR UNEXPIRED LEASE WAS REJECTED PURSUANT TO THE PLAN, THEN A PROOF OF CLAIM FOR DAMAGES, IF ANY, ARISING FROM THE REJECTION OF THAT CONTRACT, OR LEASE MUST BE FILED SO AS TO BE ACTUALLY RECEIVED BY THE DEBTOR'S CLAIMS AGENT, THE GARDEN CITY GROUP, INC., ON OR BEFORE DECEMBER 23, 2009 IN ORDER TO BE CONSIDERED TIMELY.

If you have already filed a proof of claim for damages arising from the rejection of your contract or lease, there is no need to file another proof of claim for such damages. However, if you fail to file a timely claim for such damages, you shall be forever barred, estopped, and enjoined from asserting such a claim against the Debtor or the Reorganized Debtor or its properties or interests in property, and the Debtor and Reorganized Debtor and its properties and interests in properties shall be forever discharged from any and all indebtedness or liability with respect to such claim.

Each such proof of claim shall be an original, shall substantially conform to the proof of claim for approved by the Court or the Official Form No. 10, shall be duly executed and written in the English language, shall set forth the Debtor's name and the chapter 11 case number shall set forth all amounts claimed therein in the United States dollars, and shall be delivered to the claims agent in these cases, as follows:

(if mailed)

The Garden City Group, Inc.
Attn: Chiyoda America, Inc.
P.O. Box 9531
Dublin, Ohio 43017-4831

(if sent by hand delivery or overnight courier)

The Garden City Group, Inc.
Attn: Chiyoda America, Inc.
5151 Blazer Parkway, Suite A
Dublin, Ohio 43017

Proof of claim forms may be requested telephonically from The Garden City Group, Inc. at (631) 470-5000.

¹ The Confirmation Order also provides that any agreement by a party to (i) refrain from offering employment to persons employed by the Debtor, (ii) refrain from competition with the Debtor's business, (iii) refrain from soliciting business transactions from the Debtor's customers (iv) protect the Debtor's confidential information from disclosure, or (v) recognize the Debtor's ownership of any intellectual property or inventions, shall remain in full force and effect and shall be enforceable by the Debtor or the Reorganized Debtor, as the case may be, to the fullest extent permitted by applicable law.

DEADLINE FOR FILING ADMINISTRATIVE EXPENSE CLAIMS, AS WELL AS FEE AND EXPENSE REIMBURSEMENT APPLICATIONS

Section 1.3 of the Plan defines Administrative Expense Claims as any right to payment constituting a cost or expense of administration of the Reorganization Cases which is Allowed under sections 330, 503(b), 507(a)(2) and 507(b) of the Bankruptcy Code, including, without limitation, (a) any actual and necessary costs and expenses of preserving the Debtor's estate, (b) any actual and necessary costs and expenses of operating the Debtor's businesses, (c) any indebtedness or obligations incurred or assumed by the Debtor in Possession during the Reorganization Case and (d) any compensation for professional services rendered and reimbursement of expenses incurred.

IF YOU HAVE AN ADMINISTRATIVE EXPENSE CLAIM (OTHER THAN ONE FOR COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED) THAT HAS NOT YET BEEN PAID, THEN PURSUANT TO THE CONFIRMATION ORDER YOUR REQUEST FOR PAYMENT OF SUCH AN ADMINISTRATIVE EXPENSE CLAIM MUST BE FILED, NO LATER THAN 30 DAYS AFTER THE EFFECTIVE DATE OF THE PLAN OR YOU WILL BE FOREVER BARRED FROM DOING SO.

All entities seeking awards by the Court of compensation for professional services rendered or reimbursement of expenses incurred through and including the Confirmation Date (each a "Final Fee Application")² under Sections 330, 331, 503(b)(2), 503(b)(3), 503(b)(4) or 503(b)(5) of the Bankruptcy Code shall (a) file, on or before the date that is twenty (20) days after the Effective Date their respective applications for final allowances of compensation for services rendered and reimbursement of expenses incurred and (b) be paid in full, in Cash, in such amounts as are Allowed by the Bankruptcy Court in accordance with the order relating to or Allowing such Administrative Expense Claim. The Debtor will file a notice of the Effective Date.

Final Fee Applications, together with proof of service thereof, shall be filed with the Bankruptcy Court and served on (i) counsel for the Debtor, Blank Rome, LLP, One Logan Square, 130 N. 18th Street, Philadelphia, PA 19103 (Attn: Joel C. Shapiro) and Blank Rome LLP, The Chrysler Building, 405 Lexington Avenue, New York, New York 10174-0208 (Attn: Michael Z. Brownstein and Rocco Cavaliere), (ii) the U.S. Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Susan Golden), and (iii) Bingham McCutchen LLP, 399 Park Avenue, New York, New York 10022 (Attn: Kate Simon).

² Any application for such fee and expenses may cover requests through the end of the month of the Confirmation Date for purposes of administrative convenience.

Objections, if any, to any Final Fee Application shall be filed with the Bankruptcy Court, together with proof of service thereof, and served upon the applicant and the parties identified above, so as to be filed and actually received not later than 4:00 p.m. prevailing Eastern Time on the date that is five business days prior to the hearing on such Final Fee Application.

Dated: November 10, 2009
New York, New York

By: /s/ Michael Z. Brownstein
Michael Z. Brownstein

Blank Rome LLP
The Chrysler Building
405 Lexington Avenue
New York, NY 10174-0208

and

Joel C. Shapiro, Esquire
One Logan Square
130 N. 18th Street
Philadelphia, PA 19103

Attorneys for Debtor