

BLANK ROME LLP
Proposed Attorneys for Debtor
The Chrysler Building
405 Lexington Avenue
New York, NY 10174
(212) 885-5000
Michael Z. Brownstein
Joel C. Shapiro
Rocco A. Cavaliere

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

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

**NOTICE OF DEBTOR'S MOTION FOR (i) APPROVAL OF
THE DISCLOSURE STATEMENT; (ii) APPROVAL OF THE NOTICE
OF DISCLOSURE STATEMENT HEARING; (iii) THE FIXING OF THE VOTING
RECORD DATE; (iv) APPROVAL OF THE NOTICE AND OBJECTION
PROCEDURES IN RESPECT OF CONFIRMATION OF THE PLAN OF
REORGANIZATION; (v) APPROVAL OF SOLICITATION PACKAGES AND
PROCEDURES FOR DISTRIBUTION THEREOF; (vi) APPROVAL OF THE FORMS
OF BALLOTS AND ESTABLISHMENT OF PROCEDURES FOR VOTING ON THE
PLAN OF REORGANIZATION; (vii) APPROVAL OF THE FORMS OF NOTICES TO
NON-VOTING CLASSES UNDER THE PLAN OF REORGANIZATION; (viii) THE
FIXING OF THE VOTING DEADLINE TO ACCEPT OR REJECT THE PLAN; AND
(ix) APPROVAL OF PROCEDURES
FOR VOTE TABULATION**

PLEASE TAKE NOTICE that a hearing on the annexed Motion of Chiyoda America,
Inc. as debtor in possession (the "Debtor") for (i) Approval of the Disclosure Statement; (ii)
Approval of the Notice of Disclosure Statement Hearing; (iii) Fixing the Voting Record Date;
(iv) Approval of the Notice and Objection Procedures in Respect of Confirmation of the Plan of

Reorganization; (v) Approval of Solicitation Packages and Procedures for Distribution Thereof; (vi) Approval of the Forms of Ballots and Establishment of Procedures for Voting on the Plan of Reorganization; (vii) Approval of the Forms of Notices to Non-Voting Classes Under the Plan of Reorganization; (viii) Fixing of the Voting Deadline to Accept or Reject the Plan; and (ix) Approval of Procedures for Vote Tabulation, will be held before the Honorable Arthur J. Gonzalez, United States Bankruptcy Judge, at the United States Bankruptcy Court, Alexander Hamilton Customs House, Room 523, One Bowling Green, New York, New York 10004 (the “Bankruptcy Court”), on October 7, 2009 at 11:00 a.m. (Prevailing New York City Time) (the “Hearing”).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and the Local Rules of the Bankruptcy Court for the Southern District of New York, shall set forth the name of the objecting party, the basis for the objection and the specific grounds thereof, shall be filed with the Bankruptcy Court electronically in accordance with General Order M-242 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court’s case filing system and by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with two hard copies delivered directly to Chambers), and shall be served upon all parties on the Master Service List filed in these cases,¹ including the following: (i) counsel for the Debtor, Blank Rome LLP, The Chrysler Building, 405 Lexington Avenue, New York, New York, 10174-0208 (Attn: Michael Z. Brownstein and Rocco A. Cavaliere), (ii) the U.S. Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Richard Morrissey), (iii) Bingham McCutchen LLP, 399 Park Avenue New York, NY

10022 (Attn: Anna M. Boelitz and Mark W. Deveno), (iv) Blank Rome, LLP, One Logan Square, Philadelphia, PA 19103 (Attn: Joel C. Shapiro), so as to be received no later than **October 2, 2009 at 5:00 p.m. (Eastern Time)** (the "Objection Deadline").

PLEASE TAKE FURTHER NOTICE that if an objection to the Motion is not received by the Objection Deadline, the relief requested shall be deemed unopposed, and the Bankruptcy Court may enter an order granting the relief sought without a hearing.

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the Hearing and failure to appear may result in the relief being requested in the Motion being granted or denied upon default.

Dated: New York, New York
August 26, 2009

By: /s/ Michael Z. Brownstein
Michael Z. Brownstein
Joel C. Shapiro
Blank Rome LLP
One Logan Square
130 N. 18th Street
Philadelphia, PA 19103-6998
(215) 569-5500
Facsimile: (215) 569-5555

Attorneys for Debtor

¹ A copy of the Master Service List can be obtained free of charge on the Internet at www.CAIReorg.com