

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In Re: )  
 ) Chapter 11  
HOLIDAY RV SUPERSTORES, INC, )  
 ) Case No. 03-13221 (MFW)  
 )  
Debtor. ) Hearing Date: August 25, 2004 at 9:30 a.m.  
 ) Objection Deadline: August 18, 2004 at 4:00 p.m.

**NOTICE TO NON-VOTING PARTIES OF (A) HEARING TO CONSIDER  
CONFIRMATION OF SECOND AMENDED PLAN OF REORGANIZATION OF  
HOLIDAY RV SUPERSTORES, INC. AND (B) RELATED MATTERS**

PLEASE TAKE NOTICE THAT:

1. On October 20, 2003 (the "Filing Date"), Holiday RV Superstores, Inc. (the "Debtor"), filed with the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court") a voluntary petition for relief under Chapter 11 of the United States Code (the "Bankruptcy Code").

2. On July 12, 2004, the Debtor filed with the Bankruptcy Court the second amended plan of reorganization of Holiday RV Superstores, Inc. (the "Plan") and the second amended disclosure statement for second amended plan of reorganization of Holiday RV Superstores, Inc. dated July 12, 2004 providing information with respect to the Plan (the "Disclosure Statement").<sup>1</sup>

3. Pursuant to the Disclosure Statement Order dated July 14, 2004, the Disclosure Statement and certain related materials (collectively, the "Solicitation Materials") have been approved for solicitation of votes to accept or reject the Plan.

4. The Confirmation Hearing will be held before the Honorable Mary F. Walrath, United States Bankruptcy Judge for the District of Delaware, 824 Market Street, 6th Floor, Wilmington, Delaware 19801, on August 25, 2004, at 9:30 a.m., Eastern Time.

5. Pursuant to the Disclosure Statement Order, the Bankruptcy Court approved certain solicitation procedures for the Plan which, inter alia, provided that Creditors and Equity Interest holders not entitled to vote on the Plan in accordance with applicable bankruptcy law ("Non Voting Parties") need not receive Ballots or copies of the Plan and Disclosure Statement. Thus, Non Voting Parties will not receive Solicitation Materials. The following parties are Non-Voting Parties:

- Administrative Expense and Priority Tax Claims are being paid in full under the Plan and are not entitled to vote on the Plan.

<sup>1</sup> Capitalized terms not defined in this Notice shall have the meaning assigned to them in the Plan.

- Class 2 (Priority Claims) under the Plan is unimpaired and, therefore, is conclusively presumed to accept the Plan in accordance with section 1126(f) of the Bankruptcy Code.
- Holders of Claims in Class 4 (Non-Debtor Subsidiary Claims) and Equity Interests in Class 5 (Equity Interests) under the Plan neither retain nor receive any property under the Plan; therefore, these Classes are deemed to reject the Plan in accordance with section 1126(g) of the Bankruptcy Code.
- Holders of Claims that have not timely filed a proof of claim and that are not listed on the Debtor's Schedules or are listed as being contingent, unliquidated or disputed do not have a Claim and are not entitled to vote on the Plan.

6. Requests for copies of the Disclosure Statement and the Plan by Non-Voting Parties may be made in writing to Delaware Claims Agency LLC, P.O. Box 515, Wilmington, Delaware, 19899 (Attn: Holiday RV Claims Department).

**7. PLEASE TAKE NOTICE THAT, IN CONNECTION WITH CONFIRMATION OF THE PLAN, THE DEBTOR IS SEEKING APPROVAL OF CERTAIN RELEASES THAT WILL BECOME EFFECTIVE AND BINDING ON THE EFFECTIVE DATE IN ACCORDANCE WITH THE TERMS OF THE PLAN AND THE CONFIRMATION ORDER.**

8. Any objections to the confirmation of the Plan (a) shall be in writing, (b) shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, (c) shall set forth the name of the objector, the nature and amount of any claim or interest held or asserted by the objector against the estate or property of the Debtor, (d) shall state with particularity the legal and factual basis for the objection and (e) shall be filed with the Bankruptcy Court together with proof of service, and served upon the following persons so as to be received on or before 4:00 p.m. Eastern Time, on August 18, 2004: (i) counsel to the Debtor, Blank Rome LLP, 1201 Market Street, Suite 800, Wilmington, DE 19801, Attn: Elio Battista, Jr.; (ii) counsel to the Debtor's Secured Lenders, Kaplan Strangis and Kaplan, P.A., 5500 Wells Fargo Center, 90 South Seventh Street, Minneapolis, MN 55402, Attn: Andris A. Baltins; (iii) counsel to the Official Committee of Unsecured Creditors, Lowenstein Sandler PC, 65 Livingston Ave., Roseland, NJ 07068, Attn: Ira M. Levee and Klett Rooney Lieber & Schorling, 1000 West Street, Suite 1410, Wilmington, DE 19801, Attn: Mary F. Caloway; and (iv) the Office of the United States Trustee, J. Caleb Boggs Building, 844 King Street, Room 2311, Wilmington, DE 19801, Attn: Margaret Harrison.

9. The Confirmation Hearing may be continued from time with such notice as may be directed by the Court .

Dated: Wilmington, Delaware  
July 14, 2004

BLANK ROME LLP

s/ Elio Battista, Jr.

Mark J. Packel (DE No. 4048)  
Elio Battista, Jr. (DE No. 3814)  
1201 Market Street, Suite 800  
Wilmington, DE 19801  
Telephone: (302) 425-6400  
Facsimile: (302) 425-6464

Counsel for Holiday RV Superstores, Inc.