

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
APCO LIQUIDATING TRUST and,)	Case No. 05-12355 (PJW)
APCO MISSING STOCKHOLDER TRUST,)	
)	Jointly Administered
Debtors.)	

NOTICE OF BAR DATES FOR FILING OF PROOFS OF CLAIM

On September 13, 2005, the United States Bankruptcy Court for the District of Delaware (the "Court") entered an order (the "Bar Date Order") establishing certain claims bar dates in the chapter 11 cases of the above-captioned debtors and debtors in possession (collectively, the "Debtors"). By the Bar Date Order, the Court fixed **November 15, 2005 at 5:00 p.m., prevailing Eastern Time**, as the general claims bar date (the "General Bar Date"). Except as described below, the Bar Date Order requires all Entities, other than Governmental Units, that have or assert any prepetition Claims against the Debtors to file proofs of claim with Delaware Claims Agency, LLC ("DCA"), the claims and noticing agent in these cases, so that their proofs of claim are **received** by DCA on or before the General Bar Date. Further, by the Bar Date Order, the Court fixed **February 15, 2006 at 5:00 p.m., prevailing Eastern Time**, as the Governmental Unit claims bar date (the "Government Bar Date"). Please note that the terms "Entity," "Governmental Unit" and "Claim" are defined below.

For your convenience, enclosed with this Notice is a proof of claim form, which identifies on its face the amount, nature and classification of your Claim(s), if any, listed in the Debtors' schedules of assets and liabilities filed in these cases (collectively, the "Schedules").

KEY DEFINITIONS

As used in this Notice, the term "**Entity**" has the meaning given to it in section 101(15) of title 11 of the United States Code, 11 U.S.C. §§ 101-1330 (the "Bankruptcy Code"), and includes all persons, estates, trusts, Governmental Units and the Office of the United States Trustee.

As used in this Notice, the term "**Governmental Unit**" has the meaning given to it in section 101(27) of the Bankruptcy Code and includes the United States; states; commonwealths; districts; territories; municipalities; foreign states; or departments, agencies or instrumentalities of the foregoing (but not including the Office of the United States Trustee while serving as a trustee under the Bankruptcy Code).

As used in this Notice, the term "**Claim**" shall mean, as to or against any of the Debtors and in accordance with section 101(5) of the Bankruptcy Code: (a) any right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured or unsecured; or (b) any right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured or unsecured. For the avoidance

of doubt, any Governmental Unit whose right to payment from the Missing Stockholder Trust arises pursuant to any applicable state escheat law shall be deemed to hold a Claim for purposes of the Governmental Bar Date.

WHO MUST FILE A PROOF OF CLAIM AND THE APPLICABLE BAR DATES

The Bar Dates

The Bar Date Order establishes the following bar dates for filing proofs of claim in these cases (collectively, the “Bar Dates”):

- (a) **The General Bar Date.** Pursuant to the Bar Date Order, all Entities, other than Governmental Units, holding Claims against the Debtors (whether secured, unsecured priority or unsecured nonpriority) that arose prior to August 19, 2005, are required to file proofs of claim by the General Bar Date.
- (b) **The Government Bar Date.** Pursuant to the Bar Date Order, all governmental units holding Claims against the Debtors that arose prior to August 19, 2005, are required to file proofs of claim by the Government Bar Date.
- (c) **The Rejection Bar Date.** Any Entity whose Claim arises out of the Court-approved rejection of an executory contract or unexpired lease, may assert claims in connection with the Debtors’ rejection of such executory contract or unexpired leases pursuant to section 365 of the Bankruptcy Code. Unless a different deadline has previously been established by an order of the Court, for any claim relating to Debtors’ rejection of an executory contract or unexpired lease (a “Rejection Damages Claim”) the Rejection Bar Date for such a claim will be the later of (i) the General Bar Date and (ii) 30 days after the date of the Rejection Order.
- (d) **The Schedule Bar Date.** If, subsequent to the mailing and publication of this Notice, the Debtors amend their Schedules to reduce the undisputed, noncontingent and liquidated amount or to change the nature or classification of a Claim against a Debtor reflected therein, the affected claimant is required to file a proof of claim or amend any previously filed proof of claim in respect of the amended scheduled claim on or before the later of: (i) the General Bar Date and (ii) 20 days after the date that notice of the applicable amendment to the Schedules is served on the claimant. To the extent that Debtors amend their schedules relating to the claim of any creditor, and in accordance with Local Rule 1009-2, the Debtors will serve notice of both the amendment and the Schedule Bar date on such affected creditor.

Entities That Must File Proofs of Claims by the General Bar Date or the Government Bar Date

Subject to terms described above for holders of Claims subject to the Rejection Bar Date and the Schedule Bar Date, the following Entities must file proofs of claim on or before the General Bar Date or the Government Bar Date, as applicable:

- (a) any Entity whose prepetition Claim against a Debtor is not listed in the applicable Debtor's Schedules or is listed as "disputed," "contingent" or "unliquidated" and that desires to participate in these chapter 11 cases or share in any distribution in these chapter 11 cases;
- (b) any Entity that believes its prepetition Claim is improperly classified in the Schedules or is listed in an incorrect amount and that desires to have its Claim allowed in a classification or amount other than that identified in the Schedules; and
- (c) to the extent not covered by subsections (a) or (b) of this paragraph, any governmental unit whose right to payment from the Missing Stockholder Trust arises pursuant to any applicable state escheat law.

Entities Not Required to File Proofs of Claim by the General Bar Date

The Bar Date Order further provides that the following Entities need not file proofs of claim by the General Bar Date:

- (a) any Entity that already has properly filed a proof of claim against one or more of the Debtors in accordance with the procedures described in this Notice;
- (b) any Entity (i) whose Claim against a Debtor is not listed as "disputed," "contingent" or "unliquidated" in the Schedules and (ii) that agrees with the nature, classification and amount of its Claim as identified in the Schedules; and
- (c) any Entity whose Claim against a Debtor previously has been allowed by, or paid pursuant to, an order of the Court.

CONSEQUENCES OF FAILURE TO FILE PROOF OF CLAIM

Any Entity that is required to file a proof of claim, but that fails to do so by the applicable Bar Date described in this Notice, shall be forever barred, estopped and enjoined from the following:

- (a) asserting any Claim against the Debtors that the Entity has that (i) is in an amount that exceeds the amount, if any, that is identified in the Schedules on behalf of such Entity as undisputed, noncontingent and liquidated or (ii) is of a different nature or a different classification than any Claim identified in the Schedules on behalf of such Entity (any such Claim being referred to in this Notice as an "Unscheduled Claim"); or
- (b) voting upon, or receiving distributions under, any plan or plans of reorganization in these chapter 11 cases in respect of an Unscheduled Claim.

If it is unclear from the Schedules whether your Claim is disputed, contingent or unliquidated as to amount or is otherwise properly listed and classified, you must file a proof of claim on or before the applicable Bar Date. Any Entity that relies on the information in the Schedules bears responsibility for determining that its Claim is accurately listed therein.

PROCEDURE FOR FILING PROOFS OF CLAIM

A signed original of a completed proof of claim, together with any accompanying or supporting documentation, must be delivered so as to be received no later than 5:00 p.m., prevailing Eastern Time, on the applicable Bar Date. Proofs of claim may be submitted in person or by courier service, hand delivery or mail at the following address:

If By Courier Service, Hand Delivery, or Courier:

APCO Claims Processing Center
c/o Delaware Claims Agency, LLC
230 North Market Street
2nd Floor
Wilmington, DE 19801

If By Mail:

APCO Claims Processing Center
c/o Delaware Claims Agency, LLC
P.O. Box 515
Wilmington, DE 19899

Any proof of claim submitted by facsimile or e-mail will not be accepted and will not be deemed filed until the proof of claim is submitted by one of the methods described in the foregoing sentence. Proofs of claim will be deemed filed only when actually received by DCA. If you wish to receive acknowledgement of DCA's receipt of your proof of claim, you must also submit by the applicable Bar Date and concurrently with submitting your original proof of claim (a) a copy of your original proof of claim and (b) a self-addressed, stamped return envelope.

Proofs of claim must include all documentation required by Bankruptcy Rules 3001(c) and 3001(d), including an original or a copy of any written document that forms the basis of the Claim or, for secured Claims, evidence that the alleged security interest has been perfected.

ADDITIONAL INFORMATION

If you require additional information regarding the filing of a proof of claim, you may contact the APCO Claims Hotline at 1-888-216-0309. You also may contact DCA directly by writing to APCO Claims Processing Center, c/o Delaware Claims Agency, LLC, P.O. Box 515, Wilmington, DE 19899, Attention: Matthew Helm. The claims registers for the Debtors will be available for review during normal business hours in DCA's offices at the address identified above.

Dated: September 13, 2005
Wilmington, Delaware

BY ORDER OF THE COURT:
The Honorable Peter J. Walsh

Gregory P. Williams (No. 2168)
John H. Knight (No. 3848)
Rebecca L. Booth (No. 4031)
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PROPOSED ATTORNEYS FOR DEBTORS AND
DEBTORS IN POSSESSION