

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

In re:	)	Chapter 11
	)	
NEOPLAN USA CORPORATION, <u>et al.</u> , <sup>1</sup>	)	Case No. 06-10872 (BLS)
	)	(Jointly Administered)
Debtors.	)	
	)	Hearing Date: September 21, 2006 at 1:00 p.m. EST
	)	Objection Deadline: September 14, 2006 at 4:00 p.m. EST

**NOTICE OF FILING OF AND HEARING TO CONSIDER  
APPROVAL OF DISCLOSURE STATEMENT AND NOTICE OF DEADLINE  
FOR FILING OBJECTIONS TO THE DISCLOSURE STATEMENT**

TO: All creditors and equity security holders, the office of the United States Trustee; counsel for The Bank of New York, as Agent for the Debtors' prepetition lenders; and all parties requesting notice pursuant to Bankruptcy Rule 2002

PLEASE TAKE NOTICE that on August 24, 2006, the above-captioned debtors and debtors-in-possession (collectively, the "Debtors") filed their Disclosure Statement (the "Disclosure Statement") with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Wilmington, Delaware 19801 (the "Bankruptcy Court") with respect to their Joint Plan of Liquidation Dated August 24, 2006 (the "Plan") pursuant to Section 1125 of title 11 of the United States Code (the "Bankruptcy Code"). Copies of the Disclosure Statement are being sent to the Office of the United States Trustee, the Securities and Exchange Commission, and counsel for The Bank of New York, as Agent for the Debtors' prepetition lenders. Other parties interested in receiving a copy of the Disclosure Statement should (i) send a written request to counsel for the Debtors, Ballard Spahr Andrews & Ingersoll, LLP (919 N. Market Street, 12<sup>th</sup> Floor, Wilmington, DE 19801, Attention: Leslie C. Heilman, Esquire, and 1225 Seventeenth Street, Suite 2300, Denver, CO 80202, Attention: Alan K. Motes, Esquire); or (ii) write, call or access the website of the Claims, Noticing and Balloting Agent, Delaware Claims Agency LLC, 230 North Market Street, 2<sup>nd</sup> Floor, P.O. Box 515, Wilmington, DE 19801, Attention: Joseph L. King, Telephone: (800) 838-6773, Website: [www.delawareclaimsagency.com](http://www.delawareclaimsagency.com). In addition, copies of the Disclosure Statement may be found at the Bankruptcy Court's website, [www.deb.uscourts.gov](http://www.deb.uscourts.gov), and are on file with the Clerk of the Bankruptcy Court, 3rd Floor, 824 Market Street, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that a hearing to consider approval of the Disclosure Statement will be held at **1:00 p.m., prevailing Eastern time, on September 21, 2006** (the "Hearing") before the Honorable Brendan Linehan Shannon, at the Bankruptcy Court, 824 Market Street, 6<sup>th</sup> Floor, Courtroom No. 1, Wilmington, Delaware. The Hearing may be adjourned from time to time by announcement in open court on that date or otherwise.

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<sup>1</sup> The Debtors are the following entities: (a) Neoplan USA Corporation; (b) IAP Acquisition Corp.; (c) IAP East Coast, Inc.; and (d) IAP Intermodal LLC.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the approval of the Disclosure Statement must be made in writing and filed with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Third Floor, Wilmington, Delaware 19801 no later than **September 14, 2006**. Moreover, objections or other responses to the approval of the Disclosure Statement, if any, should be served so that they are **RECEIVED** no later than **September 14, 2006, at 4:00 p.m. prevailing Eastern time**, by the following:

**Counsel for the Debtors**

Ballard Spahr Andrews & Ingersoll, LLP  
919 North Market Street, 12<sup>th</sup> Floor  
Wilmington, DE 19801  
Attn: Tobey M. Daluz, Esquire

-and-

Ballard Spahr Andrews & Ingersoll, LLP  
1225 17th Street, Suite 2300  
Denver, CO 80202-5596  
Attn: Carl A. Eklund, Esq.

**Counsel for the Lenders' Agent:**

Kaye Scholer, LLC,  
Three First National Plaza,  
70 West Madison Street, Suite 4100,  
Chicago, IL 60602  
Attn: Michael Messersmith, Esq.

-and-

Richards, Layton & Finger,  
One Rodney Square,  
920 North King Street,  
Wilmington, DE 19801  
Attn: Mark D. Collins, Esq.

**The Office of the United States Trustee**

J. Caleb Boggs Building,  
844 King Street, Suite 2207,  
Lockbox 35  
Wilmington, DE 19801-3519  
Attn: William K. Harrington, Esq.

PLEASE TAKE FURTHER NOTICE that the Debtors request that all objections and other responses to the approval of the Disclosure Statement (a) describe with specificity the legal and factual basis for the objection and the section of the Disclosure Statement to which objection is made, (b) describe the nature and amount of the objector's claim and (c) propose any changes to the disclosure statement necessary to address the objection, such as suggested amended language.

PLEASE TAKE FURTHER NOTICE that upon approval of the Disclosure Statement by the Court, holders of claims and equity interests in the Debtors will receive a copy of the Disclosure Statement, Plan, and various documents related thereto, unless otherwise ordered by the Court.

*THIS NOTICE IS NOT A SOLICITATION OF VOTES TO ACCEPT OR REJECT THE PLAN. VOTES ON THE PLAN MAY NOT BE SOLICITED UNLESS AND UNTIL THE PROPOSED DISCLOSURE STATEMENT IS APPROVED BY AN ORDER OF THE COURT.*

Dated: August 24, 2006  
Wilmington, Delaware

Respectfully Submitted,

BALLARD SPAHR ANDREWS & INGERSOLL, LLP

By: /s/ Tobey M. Daluz

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Proposed Counsel for the Debtors and Debtors in  
Possession