

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

In re:)	Chapter 11
)	
NEOPLAN USA CORPORATION, <u>et al.</u> , ¹)	Case No. 06-10872 (BLS)
)	(Jointly Administered)
Debtors.)	
)	Hearing Date: November 17, 2006 at 11:00 a.m. EST
)	Objection Deadline: November 16, 2006 at 4:00 p.m. EST

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

TO: Counsel for the Official Committee of Unsecured Creditors, 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 or before **12:00 p.m., prevailing Eastern time, on November 13, 2006**, the above-captioned debtors and debtors-in-possession (collectively, the "Debtors") will file a Second Amended Disclosure Statement (the "Disclosure Statement") and First Amended Joint Plan of Liquidation (the "Plan") with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Wilmington, Delaware 19801 (the "Bankruptcy Court"), pursuant to Section 1125 of title 11 of the United States Code (the "Bankruptcy Code"). Copies of the Disclosure Statement will be sent to counsel for the Official Committee of Unsecured Creditors, 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, 12th Floor, Wilmington, DE 19801, Attention: Leslie C. Heilman, Esquire, or 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, 2nd Floor, P.O. Box 515, Wilmington, DE 19801, Attention: Joseph L. King, Telephone: (800) 838-6773, Website: www.delawareclaimsagency.com). In addition, copies of the Disclosure Statement may be found at the Bankruptcy Court's website, 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 **11:00 a.m., prevailing Eastern time, on November 17, 2006** (the "Hearing") before the Honorable Brendan Linehan Shannon, at the Bankruptcy Court,

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

824 Market Street, 6th 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.

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 **4:00 p.m. on November 16, 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 **November 16, 2006, at 4:00 p.m., prevailing Eastern time**, by the following:

Counsel for the Debtors

Tobey M. Daluz, Esquire
Leslie C. Heilman, Esquire
Ballard Spahr Andrews & Ingersoll, LLP
919 North Market Street
12th Floor
Wilmington, DE 19801

-and-

Carl A. Eklund, Esquire
Alan K. Motes, Esquire
Ballard Spahr Andrews & Ingersoll, LLP
1225 17th Street, Suite 2300
Denver, CO 80202-5596

Counsel for the Official Committee of Unsecured Creditors:

David B. Stratton, Esquire
David M. Fournier, Esquire
Pepper Hamilton, LLP
Hercules Plaza, Suite 5100
1313 Market Street
Wilmington, DE 19801

Counsel for the Lenders' Agent:

Michael B. Solow, Esquire
Michael D. Messersmith, Esquire
Matthew J. Micheli, Esquire
Kaye Scholer, LLC,
Three First National Plaza,
70 West Madison Street, Suite 4100,
Chicago, IL 60602

-and-

Mark D. Collins, Esquire
Paul N. Heath, Esquire
Richards, Layton & Finger,
One Rodney Square,
920 North King Street,
Wilmington, DE 19801

The Office of the United States Trustee

William K. Harrington, Esquire
The Office of the United States Trustee
J. Caleb Boggs Building,
844 King Street, Suite 2207,
Lockbox 35
Wilmington, DE 19801-3519

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: November 1, 2006
Wilmington, Delaware

Respectfully Submitted,

BALLARD SPAHR ANDREWS & INGERSOLL, LLP

By: /s/ Leslie C. Heilman

Tobey M. Daluz, Esquire (No. 3939)
Leslie C. Heilman, Esquire (No. 4716)
919 N. Market Street, 12th Floor
Wilmington, DE 19801
Telephone: (302) 252-4465
Facsimile: (302) 252-4466
Email: daluzt@ballardspahr.com
heilmanl@ballardspahr.com

-and-

Carl A. Eklund, Esquire
Alan K. Motes, Esquire
1225 17th Street, Suite 2300
Denver, CO 80202-5596
Telephone: (303) 292-2400
Facsimile: (303) 296-3956
Email: eklundc@ballardspahr.com
motesa@ballardspahr.com

Counsel for the Debtors and Debtors in Possession