

**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.)	

**NOTICE OF DATE AND TIME OF (I) HEARING TO CONSIDER
CONFIRMATION OF DEBTORS' FIRST AMENDED JOINT PLAN
OF REORGANIZATION; (II) DEADLINE FOR FILING BALLOTS
TO ACCEPT OR REJECT THE PLAN; AND (III) DEADLINE
FOR FILING OBJECTIONS TO THE PLAN**

PLEASE TAKE NOTICE that, on November 20, 2006, the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court")² approved the Second Amended Disclosure Statement (the "Disclosure Statement") in connection with the Debtors' First Amended Joint Plan of Reorganization (as may be amended, the "Plan") of Neoplan USA Corporation, IAP Acquisition Corp., IAP East Coast, Inc., and IAP Intermodal, LLC, the above-captioned debtors and debtors-in-possession (collectively, the "Debtors").

PLEASE TAKE FURTHER NOTICE that, by order of the Bankruptcy Court, ballots evidencing acceptance or rejection of the Plan must be submitted to the Debtors' claims, noticing, and balloting agent, Delaware Claims Agency, LLC, at the following mailing address: Delaware Claims Agency, LLC, 230 North Market Street, Second Floor, P.O. Box 515, Wilmington, DE 19801, so as to be received on or before **December 15, 2006 at 4:00 p.m. prevailing Eastern Time.**

PLEASE TAKE FURTHER NOTICE that only holders of classified claims as of **November 20, 2006** (the "Voting Record Date"), whose claims are listed on the Debtors' Schedules of Assets and Liabilities (including any amendments thereto) in a liquidated, non-contingent and undisputed amount, or who have filed proofs of claim by such date that have not been objected to, may vote to accept or reject the Plan.

PLEASE TAKE FURTHER NOTICE that any objection to confirmation of the Plan ("Objection") must be filed with the Bankruptcy Court and received by the following parties on or before **December 15, 2006 at 4:00 p.m. prevailing Eastern Time:**

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.

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Plan and/or Disclosure Statement.

Counsel for the Debtors:

Ballard Spahr Andrews & Ingersoll, LLP
919 North Market Street, 12th 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 Bank of New York, as Agent for the Debtors' Prepetition Lenders:

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:

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

Counsel for the Official Committee of Unsecured Creditors:

Pepper Hamilton LLP
Hercules Plaza, Suite 5100,
1313 Market Street
P.O. Box 1709
Wilmington, DE 19899-1709
Attention: David B. Stratton, Esq.

PLEASE TAKE FURTHER NOTICE that all Objections to the Plan shall specifically (a) describe with specificity the legal and factual basis for the objection, including specific reference to the text of the Plan to which the objection is made and (b) set forth the name of the objector and describe the nature and amount of any claim or interest asserted by the objector against or in the Debtors, their estates, or their property.

PLEASE TAKE FURTHER NOTICE that **December 19, 2006 at 4:00 p.m. prevailing Eastern Time** is hereby fixed as the date and time by which the Debtors may file any responses to any Plan Objections.

PLEASE TAKE FURTHER NOTICE that the hearing for consideration of confirmation of the Plan, and of any Objections thereto (the "Confirmation Hearing"), will be held on **December 21, 2006, at 10:00 a.m. prevailing Eastern Time**, before the Honorable Brendan Linehan Shannon, United States Bankruptcy Judge, at the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 6th Floor, Courtroom No. 1, Wilmington, Delaware 19801. The Confirmation Hearing may be continued from time to time by announcement of such continuance in open court, or by a written notice filed with the Court and served on all parties who have filed Objections to confirmation of the Debtors' Plan and all parties entitled to receive notice pursuant to Bankruptcy Rule 2002. The Plan may be further modified, if necessary, pursuant to 11 U.S.C. § 1127, prior to, during, or as a result of the Confirmation Hearing, without further notice to parties in interest.

PLEASE TAKE FURTHER NOTICE that any party whose proof of claim has been objected to by the Debtor on or before five (5) business days following the Voting Record Date, may not vote on the Plan unless such party files a motion seeking allowance of its claim for voting purposes on or before **fifteen (15) days following the service of said objection at 4:00 p.m. on such day prevailing Eastern Time**. Any party timely filing and serving such a motion shall be permitted to cast a provisional vote to accept or reject the Plan, pending a final determination by the Bankruptcy Court. Any and all motions seeking allowance for voting purposes only shall be heard by the Bankruptcy Court at the Confirmation Hearing.

PLEASE TAKE FURTHER NOTICE that, except as may be provided in the Plan, the Debtors will reject all executory contracts and unexpired leases not previously assumed or assumed in connection with the Plan.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Plan, all claims arising from the rejection of an unexpired lease or executory contract that has not separately been rejected by an order of the Bankruptcy Court **MUST** be filed within thirty (30) days after entry of the order confirming the Plan (the "Confirmation Order"). All claims for rejection damages not filed within that time shall be forever barred from assertion against the Debtors, their estates or property.

PLEASE TAKE FURTHER NOTICE that any party in interest wishing to obtain a copy of (i) the Disclosure Statement, (ii) the Plan, (iii) the Order Approving Second Amended Disclosure Statement for Debtors' First Amended Joint Plan of Reorganization (iv) the Order (I) Scheduling a Hearing on Confirmation of Plan and Approving Form of Notice Thereof and Related Notice Procedures, (II) Establishing Plan Solicitation, Voting, and Vote Tabulation

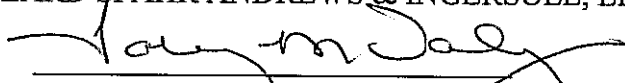
Procedures, or (v) any exhibits or appendices to such pleadings, may request such copies by (a) requesting a copy from the Debtors' claims, noticing and balloting agent, Delaware Claims Agency, LLC, 230 North Market Street, 2nd Floor, P.O. Box 515, Wilmington, Delaware 19801 (b) requesting a copy from Debtors' counsel, Ballard Spahr Andrews & Ingersoll LLP, 919 North Market Street, 12th Floor, Wilmington, DE 19801-3034, (302) 252-4465, Attention: Leslie C. Heilman, Esquire, or 1225 17th Street, Suite 2300, Denver, CO 80202-5596, Attention Alan K. Motes, Esquire; (c) written request upon the Clerk's office, United States Bankruptcy Court For the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, DE 19801; or (d) downloading a copy from the United States Bankruptcy Court For the District of Delaware's website, www.deb.uscourts.gov.

Dated: November 21, 2006
Wilmington, Delaware

Respectfully Submitted,

BALLARD SPAHR ANDREWS & INGERSOLL, LLP

By:



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Counsel for the Debtors and Debtors in Possession