

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

In re:	X	Chapter 11
	:	
COMFORT CO., INC.,	:	Case No. 08-12305 (MFW)
a Delaware corporation, <i>et al.</i> , ¹	:	
	:	Jointly Administered
Debtors.	:	
	X	Related to Docket No. 357 and 458

**NOTICE OF (A) ENTRY OF ORDER CONFIRMING THE DEBTORS' FIRST
AMENDED JOINT PLAN OF REORGANIZATION UNDER CHAPTER 11 OF THE
BANKRUPTCY CODE, (B) OCCURRENCE OF THE EFFECTIVE DATE, AND (C)
CERTAIN DEADLINES FOR FILING ADMINISTRATIVE CLAIMS**

**TO: ALL HOLDERS OF CLAIMS, INTERESTS AND OTHER PARTIES IN
INTEREST IN THESE CHAPTER 11 CASES, PLEASE TAKE NOTICE OF THE
FOLLOWING:**

1. **Confirmation of the Plan.** On February 4, 2009, the United States Bankruptcy Court for the District of Delaware (the "Court") entered the *Findings of Fact, Conclusions of Law, and Order Confirming the Debtors' First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code* [Docket No. 458] (the "Confirmation Order"). Unless otherwise noted herein, all capitalized terms used but not otherwise defined herein, shall have the meanings ascribed to them in the *Debtors' First Amended Joint Plan of Reorganization under Chapter 11 of the Bankruptcy Code* [Docket No. 357] (the "Plan").

2. **Confirmation Documents/Questions.** Parties who wish to obtain copies of the Confirmation Order, the Plan or other pleadings filed in these Chapter 11 Cases may do so by

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Comfort Co., Inc. (0360); Sleep Innovations, Inc. (6386); Advanced Innovations Central, LLC (7109); Advanced Innovations East, LLC (2669); Advanced Innovations West, LLC (2116); Advanced Urethane Technologies, Inc. (1725); AUT Brenham, Inc. (7286); AUT Dallas, Inc. (7706); AUT Lebanon, Inc. (7928); AUT Newburyport, Inc. (7032); and AUT West Chicago, Inc. (7561). The address for all of the Debtors is 187 Route 36, Suite 101, West Long Branch, NJ 07764.

contacting the Debtors' voting and claims agent, The Garden City Group, Inc., by: (a) calling the Debtors' restructuring hotline at 1-866-393-0257; (b) visiting the Debtors' restructuring website at: <http://www.sleepinnovationschl1.com> and/or (c) writing to The Garden City Group, Inc., Attention: Comfort Co., Inc., 105 Maxess Road, Melville, NY 11747. Parties may also obtain copies of any pleadings filed in these chapter 11 cases for a fee via PACER at: <http://www.deb.uscourts.gov>.

3. Effective Date; Distributions. The proponents of the Plan have established **March 5, 2009** as the effective date of the Plan (the "Effective Date"). Creditors holding claims against the Debtors' estate as of December 29, 2008, which is the record holder date for purposes of the Plan, will be entitled to receive distributions in accordance with the terms of the Plan to the extent that their claims are allowed. Any Existing Equity Interests (as defined in the Plan) in any of the Debtors, and any instruments evidencing them, are deemed cancelled as of the Effective Date without payment of any monies or other consideration.

4. Parties Bound by the Plan. The terms of the Plan and all exhibits thereto, the final versions of all documents contained in the Plan Supplement and all other relevant and necessary documents, as may be amended from time to time, shall be deemed binding upon: (a) the Debtors; (b) the Reorganized Debtors; (c) all holders of Claims against and Equity Interests in the Debtors, whether or not Impaired under the Plan and whether or not, if Impaired, such holders failed to vote to accept or reject the Plan or voted to reject the Plan (provided however, the third party releases described in Section IX(I) of the Plan shall not be binding on those Persons who (i) timely returned a ballot rejecting the Plan, (ii) elected to opt-out of the releases described in Section IX(I) of the Plan, in accordance with the instructions therein, or (iii) were entitled to vote on the Plan and failed to return a ballot); (d) each Person acquiring property

under the Plan; (e) any other party in interest; (f) any Person making an appearance in these Chapter 11 Cases; and (g) each of the foregoing's respective heirs, successors, assigns, trustees, executors, administrators, affiliates, officers, directors, agents, representatives, attorneys, beneficiaries, or guardians, to the maximum extent permitted by applicable law.

5. Releases. To the extent set forth in the Plan, any and all Causes of Action, whether under the Bankruptcy Code or otherwise under applicable non-bankruptcy law: (a) between the Debtors, on the one hand, and the Released Parties, on the other (to the extent set forth in Section IX(H) of the Plan); and (b) as between all Persons who voted to accept the Plan and the Released Parties (to the extent set forth in Section IX(I) of the Plan); are settled, compromised and released pursuant to the Plan.

6. Executory Contracts and Unexpired Leases. Pursuant to the Section XII(A) of the Plan, with the exception of (i) executory contracts or unexpired leases that have been rejected by the Debtors before the Confirmation Date; (ii) executory contracts or unexpired leases that were the subject of a motion to reject pending on the Confirmation Date; (iii) employment agreements that were terminated or rejected prior to the Confirmation Date, were the subject of a motion to reject pending on the Confirmation Date or were otherwise terminated in connection with the Plan; (iv) executory contracts or unexpired leases that have expired or terminated pursuant to their own terms during the pendency of these Chapter 11 Cases; (v) benefit plans (which are specifically addressed in Section XIII of the Plan); and (vi) insurance policies (which are specifically addressed in Section IX(L) and IX(M) of the Plan), all unexpired leases and executory contracts that exist between the Debtors and any Person as of the Effective Date will be specifically assumed as of, and subject to the occurrence of, the Effective Date. All Proofs of Claim with respect to Claims arising from the rejection of an executory contract or unexpired

lease, pursuant to the Plan or the Confirmation Order must be filed with the Court within the earlier of: (i) thirty (30) days after the date of entry of an order of the Court approving such rejection, unless otherwise provided for in that order; or (ii) thirty (30) days after the Effective Date, which day is **Monday April 6, 2009**. Any Person that is required to file a Proof of Claim arising from the rejection of an executory contract or unexpired lease that fails to timely do so shall be forever barred, estopped and enjoined from asserting such claim, and such claim shall not be enforceable, against any Debtor or any Reorganized Debtor or the Estates and their property, and the Debtors or the Reorganized Debtors and the Estates and their property shall be forever discharged from any and all indebtedness and liability with respect to such claim. All such Claims shall, as of the Effective Date, be subject to the permanent injunction set forth in Section IX(E) of the Plan.

7. **Administrative Expense Claims.** Except as otherwise provided in Section III(A) of the Plan, unless previously filed, requests for payment of Administrative Claims shall be filed with the Court and served on the Reorganized Debtors not later than thirty (30) days after the Effective Date, which day is **Monday, April 6, 2009**, except as to any Administrative Claims (including, without limitation, Fee Claims (which are governed by paragraph 10 hereof), Ordinary Course Administrative Claims, DIP Claims and Administrative Claims arising under section 503(b)(9) of the Bankruptcy Code) as to which the Court has fixed a different deadline pursuant to a prior order of the Court or the Confirmation Order. Holders of Administrative Claims that are required to file and serve a request for payment of such Administrative Claims, including, without limitation, holders of Claims for liabilities constituting or relating to commercial tort claims or patent, trademark or copyright infringement claims who assert that such claims constitute Administrative Claims, that do not file and serve such a request by the

applicable Administrative Claims Bar Date shall be forever barred, estopped and enjoined from asserting such Administrative Claims against the Debtors or any Reorganized Debtors or their Estates and property and such Administrative Claims shall be deemed discharged as of the Effective Date. All such Claims shall, as of the Effective Date, be subject to the permanent injunction set forth in Section IX(E) of the Plan.

8. Objections To Administrative Expense Claims. Unless otherwise provided for by a previous order of the Court, the Reorganized Debtors shall have forty-five (45) days following the Administrative Claims Bar Date, which day is **Thursday, May 21, 2009**, to review and object to any then unpaid Administrative Claims, provided however, the same may be modified or extended from time to time by the Court and/or on motion of a party in interest if approved by the Court. Please note this provision does not apply to Professionals asserting Fee Claims; such claims are governed by paragraph 9 hereof.

9. Fee Applications. Retained Professionals or other Entities asserting a Fee Claim for services rendered before the Confirmation Date must file and serve on the Reorganized Debtors and such other Entities who are designated by the Rules, the Confirmation Order or other order of the Court, an application for final allowance of such Fee Claim no later than forty-five (45) days after the Effective Date, which day is **Monday, April 20, 2009**; *provided* that the Reorganized Debtors shall pay retained Professionals or other Entities in the ordinary course of business for any work performed after the Confirmation Date; *provided, further*, that any professional who may receive compensation or reimbursement of expenses pursuant to the Ordinary Course Professionals Order may continue to receive such compensation and reimbursement of expenses for services rendered before the Effective Date, without further Court order, pursuant to the Ordinary Course Professionals Order.

10. Fee Objections. Objections to any Fee Claim must be filed and served on the Reorganized Debtors and the requesting party no later than thirty (30) days (or longer period as may be allowed by the Court) after the filing of the applicable request for payment of the Fee Claim. To the extent necessary, the Confirmation Order shall amend and supersede any previously entered order of the Court regarding the payment of Fee Claims.

DATED: March 6, 2009
Wilmington, Delaware

/s/ Michael R. Lastowski

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