

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

FEDERAL-MOGUL GLOBAL INC.,
T&N LIMITED, et al.,¹

Debtors.

Chapter 11

Case No. 01-10578 (AMW)

Jointly Administered

**NOTICE OF BAR DATE OF MARCH 3, 2003 AT 4:00 P.M. FOR
FILING PROOFS OF CLAIM ON ACCOUNT OF DAMAGE CAUSED
BY ASBESTOS TO PROPERTY IN THE UNITED STATES AND CANADA**

**TO ANY CREDITORS OF THE DEBTORS IN THE ABOVE-CAPTIONED
CASES LISTED IN FOOTNOTE 1 BELOW (THE “DEBTORS”):**

¹ The U.S. Debtors are Carter Automotive Company, Inc., Federal-Mogul Corporation, Federal-Mogul Dutch Holdings Inc., Federal-Mogul FX, Inc., Federal-Mogul Global Inc., Federal-Mogul Global Properties, Inc., Federal-Mogul Ignition Company, Federal-Mogul Mystic, Inc., Federal-Mogul Piston Rings, Inc., Federal-Mogul Powertrain, Inc., Federal-Mogul Products, Inc., Federal-Mogul Puerto Rico, Inc., Federal-Mogul Tri-Way, Inc., Federal-Mogul U.K. Holdings, Inc., Federal-Mogul Venture Corporation, Federal-Mogul World Wide, Inc., Felt Products Manufacturing Co., FM International LLC, Ferodo America, Inc., Gasket Holdings Inc., J.W.J. Holdings, Inc., McCord Sealing, Inc., and T&N Industries Inc.

The English Debtors are AE Dayton Services Limited, AE Group Machines Limited, AE Holdings Limited, AE International Limited, AE Limited, AE Piston Products Limited, AE Sales (Africa) Limited, Aeroplane & Motor Aluminium Castings Limited, Amber Supervision Limited, Ashburton Road Services Limited, Associated Engineering Group Limited, Awncast Limited, Bearings (North-Western) Limited, Brake Linings Limited, Colvan Rubber Co. Limited, Contact 100 Limited, Cosmid Limited, Cranhold Limited, Dealings Limited, Dumplington Services Limited, Duron Limited, E W Engineering Limited, Edmunds, Walker & Co. Limited, Engineering Components Limited, Federal-Mogul Acquisition Company Limited, Federal-Mogul Aftermarket UK Limited, Federal-Mogul Bradford Limited, Federal-Mogul Brake Systems Limited, Federal-Mogul Bridgwater Limited, Federal-Mogul Camshaft Castings Limited, Federal-Mogul Camshafts Limited, Federal-Mogul Engineering Limited, Federal-Mogul Eurofriction Limited, Federal-Mogul Export Services Limited, Federal-Mogul Friction Products Limited, Federal-Mogul Global Growth Limited, Federal-Mogul Ignition (U.K.) Limited, Federal-Mogul Powertrain Systems International Limited, Federal-Mogul Sealing Systems (Cardiff) Limited, Federal-Mogul Sealing Systems (Rochdale) Limited, Federal-Mogul Sealing Systems (Slough) Limited, Federal-Mogul Sealing Systems Limited, Federal-Mogul Shoreham Limited, Federal-Mogul Sintered Products Limited, Federal-Mogul Systems Protection Group Limited, Federal-Mogul Technology Limited, Federal-Mogul U.K. Limited, Ferodo Caernarfon Limited, Ferodo Limited, FHE Technology Limited, Fleetside Investments Limited, F-M UK Holding Limited, FP Diesel Limited, Friction Materials Limited, G.B. Tools & Components Exports Limited, Genthope Limited, Greet Limited, Halls Gaskets Limited, Hepworth & Grandage Limited, High Precision Equipment Limited, Inblot Limited, Instantwonder Limited, J.W. Roberts Limited, Kings Park Housing Limited, Lalton Limited, Lanoth Limited, Lanoth Precision Equipment Limited, Leeds Piston Ring & Engineering Co. Limited, M.T.A. (Kettering) Limited, Manro Engineering Co. Limited, Mobile Distributing (Spares) Limited, Moores Plastic Units Limited, Newalls Insulation Company Limited, Ontall Limited, Payen (Europe) Limited, Pecal Limited, Presswork-Components Limited, Sintration Limited, Sourcelook Limited, Specialloid, Limited, STS (1996) Limited, TAF International Limited, T&N Holdings Limited, T&N International Limited, T&N Investments Limited, T&N Limited, T&N Materials Research Limited, T&N Piston Products Group Limited, T&N Properties Limited, T&N Shelf Eight Limited, T&N Shelf Eighteen Limited, T&N Shelf Fifteen Limited, T&N Shelf Five Limited, T&N Shelf Four Limited, T&N Shelf Fourteen Limited, T&N Shelf Nine Limited, T&N Shelf Nineteen Limited, T&N Shelf One Limited, T&N Shelf Seven Limited, T&N Shelf Six Limited, T&N Shelf Sixteen Limited, T&N Shelf Ten Limited, T&N Shelf Thirteen Limited, T&N Shelf Thirty Limited, T&N Shelf Thirty-One Limited, T&N Shelf Thirty-Three Limited, T&N Shelf Three Limited, T&N Shelf Twenty Limited, T&N Shelf Twenty-Eight Limited, T&N Shelf Twenty-Five Limited, T&N Shelf Twenty-Four Limited, T&N Shelf Twenty-Nine Limited, T&N Shelf Twenty-One Limited, T&N Shelf Twenty-Six Limited, T&N Shelf Two Limited, T&N Shelf Two Limited, T&N Trade Marks Limited, T&N Welfare Trust Limited, T&N Belting Limited, T&N Belting (Residual) Limited, T&N Industrial Products Limited, Telford Rubber Processors Limited, Telford Technology Supplies Limited, The British Piston Ring Company Limited, The Washington Chemical Company Limited, Tinblo Limited, Touchdown Adhesive Products Limited, Turner & Newall Limited, Turner Brothers Asbestos Company Limited, Tynoda Limited, Vanwall Cars Limited, Wellworthy Limited, Wellworthy Property Developments Limited, and William C. Jones (Polymers) Limited. Unlike all the other English Debtors, T&N Investments Limited is a Scottish rather than English company and has accordingly commenced administration proceedings in Scotland rather than England.

On June 13, 2002, the United States Bankruptcy Court for the District of Delaware (the “Court”) entered an order (the “Bar Date Order”) in the above-captioned chapter 11 cases setting **Monday, March 3, 2003 at 4:00 p.m., prevailing Eastern time** (the “North American PD Claims Bar Date”) as the last date and time by which proofs of claim on account of damage caused by asbestos to property located in the United States and Canada (the “North American PD Claims”) may be filed against any of the Debtors. **The Bar Date applies to all Entities (as defined below) including Governmental Units (as defined below).**

KEY DEFINITIONS

As used in this Notice, the term “Claim” or “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 (ii) 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 or equitable remedy is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, secured or unsecured.

As used in this Notice, the term “Entity” has the meaning given to it in section 101(15) of the Bankruptcy Code, 11 U.S.C. §§ 101-1330 (the “Bankruptcy Code”), and includes all persons, estates, trusts, Governmental Units and 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 United States Trustee while serving as a trustee under the Bankruptcy Code).

As used in this Notice, the term “North American PD Claim” shall mean any claim alleging, arising out of, or in any way relating to physical, economic, or any other damage or injury to any property or property interest located in the United States or Canada for which any Debtor is alleged to be liable, arising out of or in any way relating to the installation, presence, removal of, or release of asbestos from any products or materials containing asbestos. North American PD Claims include all such claims whether in tort, contract, warranty, restitution, conspiracy, contribution, indemnity, guarantee, subrogation, or any other theory of law, equity or admiralty; whether seeking compensatory, special, economic and non-economic, punitive, exemplary, administrative, or any other costs or damages; or whether seeking any legal, equitable or other relief of any kind whatsoever.

WHO MUST FILE A PROOF OF CLAIM AND THE DEADLINE TO FILE

Any Entity that wishes to assert a North American PD Claim against any Debtor must file a proof of claim on account of their North American PD Claim **no later than March 3, 2003 at 4:00 p.m., prevailing Eastern time.**

Entities wishing to assert Claims against the Debtors other than North American PD Claims do not need to file proofs of claim at the present time. The Debtors will ask the Court establish a procedure and deadline for filing all other Claims against the Debtors at a later date.

FILING PROOFS OF CLAIM AGAINST MULTIPLE DEBTORS; REQUIREMENT TO IDENTIFY DEBTOR

Any Entity asserting North American PD Claims against more than one Debtor must file a separate proof of claim with respect to each such Debtor. In addition, any Entity filing a proof of claim must identify on its proof of claim form the particular Debtor against which its North American PD Claim is asserted.

CONSEQUENCES OF FAILURE TO FILE PROOF OF CLAIM

Any Entity that fails to file a proof of claim on account of a North American PD Claim by **March 3, 2003 at 4:00 p.m., prevailing Eastern time** shall be **forever barred, estopped and enjoined** from (i) asserting any North American PD Claim against the Debtors; or (b) voting upon, or receiving distributions under, any plan or plans of reorganization in the Debtors' chapter 11 cases in respect of such North American PD Claim, notwithstanding that such Entity may later discover facts in addition to, or different from, those which that Entity knows or believes to be true as of the North American PD Claims Bar Date, and without regard to the subsequent discovery or existence of such different or additional facts.

PROCEDURE FOR FILING PROOFS OF CLAIM

If you wish to assert a North American PD Claim, you are required to use the Debtors' proof of claim form for North American PD Claims (the "North American PD Proof of Claim Form"). The North American PD Proof of Claim Form can be downloaded from the Federal-Mogul Claims Website at www.fmoclaims.com or obtained by calling the Federal-Mogul Claims Helpline toll-free at (888) 212-5571. You may not use any form other than the North American PD Proof of Claim Form to assert a North American PD Claim. Failure to use the North American PD Proof of Claim Form to assert a North American PD Claim may lead to such claim being barred even if it was otherwise properly filed.

A signed original of a completed proof of claim, together with any accompanying or supporting documentation, must be delivered to the address below so as to be received no later than 4:00 p.m., prevailing Eastern time, on March 3, 2003:

By Regular Mail

The Garden City Group, Inc.
Claims Agent for Federal-Mogul
P.O. Box 8872
Melville, NY 11747-8872

By Overnight or Hand Delivery

The Garden City Group, Inc.
Claims Agent for Federal-Mogul
105 Maxess Road
Melville, NY 11747

All filed proofs of claim must (i) be written in English; (ii) be denominated in lawful currency of the United States; and (iii) conform to the North American PD Proof of Claim Form. Proofs of claim may be submitted in person or by courier service, hand delivery or mail addressed to the Debtors' claims agent at the foregoing address. **Proofs 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 the Debtors' claims agent. If you wish to receive acknowledgement of the claims agent's receipt of your proof of claim, you must also submit, by the North American PD Claims 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 Federal Rules of Bankruptcy Procedure 3001(c) and 3001(d) and the relevant proof of claim form, including an original or a copy of any written document that forms the basis of the North American PD Claim.

Additional information regarding the filing of a proof of claim, the asbestos-containing products manufactured or sold by the Debtors, the known geographic regions where the asbestos-containing products were applied and the known dates of such applications, and the names of the Debtors' sublicensees who may have sold or applied the asbestos-containing products may be obtained by contacting the Federal-Mogul Claims Helpline or visiting the Federal-Mogul Claims Website. Questions may also be addressed in writing to:

The Garden City Group, Inc.
Claims Agent for Federal-Mogul
P.O. Box 8872
Melville, NY 11747-8872

The register of North American PD Claims asserted against the Debtors will be available for review during normal business hours at the claims agent's offices at the address identified above.

**YOU MAY WISH TO CONSULT AN ATTORNEY REGARDING THIS
MATTER.**

Dated: Wilmington, Delaware
June 13, 2002

BY ORDER OF THE COURT

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