

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

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| In re:<br><br>FEDERAL-MOGUL GLOBAL INC.,<br>T&N LIMITED, <u>et al.</u> ,<br><br>Debtors. | Chapter 11<br><br>Case No. 01-10578 (AMW)<br><br>Jointly Administered |
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**NOTICE OF BAR DATES FOR FILING  
PROOFS OF CLAIM AGAINST U.S. DEBTORS**

**TO ALL KNOWN CREDITORS OF THE FOLLOWING ENTITIES (THE “U.S. DEBTORS”):**

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| Federal-Mogul Corporation<br>Federal-Mogul Dutch Holdings Inc.<br>Federal-Mogul Global Inc.<br>Federal-Mogul Ignition Company<br>Federal-Mogul Mystic, Inc.<br>Federal-Mogul Powertrain, Inc.<br>Federal-Mogul Puerto Rico, Inc.<br>Federal-Mogul Venture Corporation<br>Felt Products Manufacturing Co.<br>Ferodo America, Inc.<br>J.W.J. Holdings, Inc.<br>T&N Industries Inc. | Carter Automotive Company, Inc.<br>Federal-Mogul FX, Inc.<br>Federal-Mogul Global Properties, Inc.<br>Federal-Mogul Machine Tool, Inc.<br>Federal-Mogul Piston Rings, Inc.<br>Federal-Mogul Products, Inc.<br>Federal-Mogul U.K. Holdings, Inc.<br>Federal Mogul World Wide, Inc.<br>FM International LLC<br>Gasket Holdings Inc.<br>McCord Sealing, Inc. |
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On September 4, 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. EASTERN TIME** as the last date and time by which all Entities (as defined below) including Governmental Units (as defined below) that wish to assert against the U.S. Debtors any General Claims that arose before October 1, 2001 must file proofs of claim with The Garden City Group, Inc., the claims agent in these cases. Please note that the terms “Entity,” “General Claim” and “Governmental Unit” are defined below.

**The General Bar Date applies to all claims against the U.S. Debtors except Asbestos-Related Personal Injury Claims and Asbestos-Related Property Damage Claims (as each term is defined below). The Court has previously established March 3, 2003 as the bar date for filing Asbestos-Related Property Damage Claims against the U.S. Debtors, and has not yet established a bar date for the filing of Asbestos-Related Personal Injury Claims. The**

**General Bar Date does not apply to claims against Debtor affiliates of Federal-Mogul Corporation that are incorporated outside of the United States.**

**KEY DEFINITIONS**

As used in this Notice, the term “**Claim**” or “**claim**” shall mean, as to or against any of the U.S. 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 “**General Claim**” means any Claim against the U.S. Debtors arising prior to October 1, 2001 other than (i) an Asbestos-Related Property Damage Claim, (ii) an Asbestos-Related Personal Injury Claim, (iii) a Rejection Claim, or (iv) an Amended Schedule Claim (as each term is defined in this Notice), including the Claims of Governmental Units. **General Claims shall include Derivative Asbestos Claims (defined below).**

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 “**Asbestos-Related Personal Injury Claim**” shall mean any claims for personal injury, including wrongful death, for which any U.S. Debtor is alleged to be liable, arising out of or relating to exposure to asbestos. Asbestos-Related Personal Injury Claims include all such claims whether in nature of or sounding in tort, contract, warranty 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. Asbestos-Related Personal Injury Claims include any such claims that have been resolved or are subject to resolution pursuant to any agreement, or any such claims that are based on a judgment or verdict. In addition, Asbestos-Related Personal Injury Claims shall include (i) claims of a husband or wife on account of their spouse’s exposure to asbestos and (ii) claims of the executor of a decedent’s estate relating to the exposure of the decedent to asbestos. **Asbestos-Related Personal Injury Claims shall not include Derivative Asbestos Claims (defined below).**

As used in this Notice, the term “**Asbestos-Related Property Damage 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 U.S. 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. Asbestos-Related Property Damage 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.

As used in this Notice, the term “**Derivative Asbestos Claim**” shall mean any claim or cross-claim against one or more of the U.S. Debtors relating to the exposure of a party or parties other than the claimant to asbestos, whether in the nature of or sounding in tort, contract, warranty, restitution, conspiracy, contribution, guarantee, indemnity, 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. Derivative Asbestos Claims include any such claims that have been resolved or are subject to resolution pursuant to any agreement, or any such claims that are based on a judgment or verdict. Derivative Asbestos Claims shall not include (i) claims of a husband or wife on account of their spouse’s exposure to asbestos and (ii) claims of the executor of a decedent’s estate relating to the exposure of the decedent to asbestos. **Derivative Asbestos Claims are included in the definition of “General Claim” and are explicitly excluded from the definition of “Asbestos-Related Personal Injury Claim.”**

### **WHO MUST FILE A PROOF OF CLAIM AND THE DEADLINES TO FILE**

The Bar Date order establishes the following bar dates for filing proofs of claim against the U.S. Debtors (collectively, the “**Bar Dates**”):

(a) **The General Bar Date.** All Entities that wish to assert General Claims (including Derivative Asbestos Claims) against any of the U.S. Debtors (whether secured, unsecured, priority or non-priority) are required to file proofs of claim by **March 3, 2003 at 4:00 p.m. Eastern time.**

(b) **The Rejection Bar Date.** Any Entity whose Claims arise out of the rejection of an executory contract or unexpired lease by the U.S. Debtors pursuant to an order entered prior to the confirmation of a plan of reorganization in the applicable U.S. Debtors’ chapter 11 case (a “**Rejection Claim**”) must file a proof of claim on or before the later of (i) the General Bar Date; and (ii) thirty (30) days after entry of the order authorizing the U.S. Debtor’s rejection of the applicable contract or lease. The later of these dates is referred to as the “**Rejection Bar Date.**”

(c) **The Amended Schedule Bar Date.** If, subsequent to the mailing and publication of this Notice, any of the U.S. Debtors amend their schedules of assets and liabilities previously filed with the Bankruptcy Court to reduce the undisputed, noncontingent and liquidated amount or to change the classification of a Claim against a U.S. Debtor reflected therein, the affected claimant is required to file a proof of claim or amend any previously filed proof of claim in

respect of the amended scheduled claim on or before the later of (i) the General Bar Date; and (ii) thirty (30) days after notice of the applicable amendment to the schedules of assets and liabilities is served on the claimant. The later of these dates is referred to in this Notice as the “**Amended Schedule Bar Date**.” Any claim relating to a subsequent amendment of the Debtors’ schedules shall be referred to as an “**Amended Schedule Claim**.”

If it is unclear from the U.S. Debtors’ schedules of assets and liabilities whether your General Claim is disputed, contingent or unliquidated as to amount or is otherwise properly listed and classified, you must file a proof of claim on or before the applicable Bar Date. Any Entity that relies on the information in the schedules of assets and liabilities bears responsibility for determining that its General Claim is listed accurately therein.

### **PROOFS OF CLAIM NOT REQUIRED TO BE FILED BY THE GENERAL BAR DATE**

The following Entities need not file proofs of claim by the General Bar Date:

- i. any entity that has already properly filed a proof of claim against one or more of the U.S. Debtors **in accordance with the procedures described herein**;
- ii. any entity (i) whose claim against a U.S. Debtor is not listed as contingent, unliquidated or disputed in such U.S. Debtor’s schedules, and (ii) that agrees with the nature, classification and amount of its claim as identified in such U.S. Debtor’s schedules;
- iii. any entity whose claim against a U.S. Debtor has previously been allowed by, or paid pursuant to, an order of the Court;
- iv. any of the U.S. Debtors or their affiliates, including any of the U.S. Debtors that hold claims against one or more of the U.S. Debtors;
- v. any entity whose claim is limited exclusively to a claim for repayment by the applicable U.S. Debtor of principal, interest and other applicable fees and charges on or under that certain Fourth Amended and Restated Credit Agreement dated as of December 29, 2000 (the “**Prepetition Credit Agreement**,” with claims arising thereon or thereunder referred to herein as “**Bank Claims**”); provided, however, that (a) the Administrative Agent under the Prepetition Credit Agreement shall be required to file a proof of claim on account of Bank Claims on or under the Prepetition Credit Agreement prior to the General Bar Date (but shall not be required to file with its proof of claim any instruments, agreements or other documents evidencing the obligations referenced in such proof of claim); and (b) any holder of a Bank Claim under the Prepetition Credit Agreement that wishes to assert a claim against a U.S. Debtor arising out of or relating to the Prepetition Credit Agreement other than a Bank Claim shall be required to file a proof of claim on account of such claim on or before the General Bar Date, unless another exception in this paragraph applies;

- vi. any entity whose claim is limited exclusively to a claim for repayment by the applicable U.S. Debtor of principal, interest and other applicable fees and charges on or under (a) the Notes and Senior Notes issued from time to time by Federal-Mogul Corporation and the Indentures (collectively, the “**Note Indentures**”) and other documents related thereto,<sup>1</sup> or (b) the Medium-Term Notes issued from time to time by Federal-Mogul Corporation and the Indentures (the “**Medium-Term Note Indentures**”) and other documents related thereto<sup>2</sup> (claims relating to the Notes, Senior Notes and Medium-Term Notes and/or their respective indentures being referred to herein as “**Note Claims**”); provided, however, that (i) the Indenture Trustees under the Note Indentures shall be required to file proofs of claim on account of Note Claims on or under the Notes, Senior Notes and/or Senior Note Indentures on or before the General Bar Date; (ii) the Indenture Trustees under the Medium-Term Note Indentures shall be required to file proofs of claim on account of Note Claims on or under the Medium-Term Notes and/or Medium-Term Note Indentures on or before the General Bar Date and (iii) any holder of Notes, Senior Notes or Medium-Term Notes issued by Federal-Mogul Corporation that wishes to assert a claim against a U.S. Debtor arising out of or relating to the Notes, Senior Notes or Medium-Term Notes and/or their respective indentures, as applicable, other than a Note Claim shall be required to file a proof of claim on account of such claim on or before the General Bar Date, unless another exception in this paragraph applies; and
- vii. any entity whose claim against a U.S. Debtor is limited to an administrative expense of any U.S. Debtor’s chapter 11 case under section 503(b) of the Bankruptcy Code.

**No Requirement For Stockholders or Other Interest Holders to File Proofs of Interest**

Any Entity holding any interest in any U.S. Debtor (an “**Interest Holder**”), which interest is based solely upon the ownership of common or preferred stock in a corporation, a membership interest in a limited liability company, or warrants or rights to purchase, sell or subscribe to such a security or interest (any such security or interest being referred to herein as an “**Interest**”) need not file a proof of interest on or before the General Bar Date; provided, however, that Interest Holders that wish to assert *claims* against any of the U.S. Debtors that arise out of or relate to the ownership or purchase of an Interest, including claims arising out of or relating to the sale, issuance or distribution of an Interest, must file proofs of claim on or before the General Bar Date, unless another of the exceptions enumerated in this Notice applies.

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<sup>1</sup> The Notes and Senior Notes issued by Federal-Mogul Corporation are comprised of (i) the 7.5% Notes due 2009, (ii) the 7.375% Notes due 2006, (iii) the 7.75% Notes due 2006, (iv) 7.875% Notes due 2010, (v) the 7.5% Notes due 2004, and (vi) the 8.8% Senior Notes due 2007.

<sup>2</sup> The Medium-Term Notes issued by Federal-Mogul Corporation are comprised of (i) the 8.37% Medium-Term Notes due 2001, (ii) the 8.25% Medium-Term Notes due 2005, (iii) the 8.33% Medium-Term Notes due 2001, (iv) the 8.12% Medium-Term Notes due 2003, (v) the 8.16% Medium-Term Notes due 2003, and (vi) the 8.46% Medium-Term Notes due 2002.

**FILING PROOFS OF CLAIM AGAINST MULTIPLE U.S. DEBTORS; REQUIREMENT TO IDENTIFY EACH U.S. DEBTOR**

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

**CONSEQUENCES OF FAILURE TO FILE PROOF OF CLAIM**

Any Entity that fails to file a proof of claim by the applicable Bar Date described in this Notice shall be **forever barred, estopped and enjoined** from (i) asserting any General Claim, Rejection Claim or Amended Schedule Claim, as applicable, against any of the U.S. Debtors in an amount that exceeds the amount, if any, that is identified in the applicable U.S. Debtor's schedules of assets and liabilities on behalf of such Entity as undisputed, noncontingent, and unliquidated; or (b) voting upon, or receiving distributions under, any plan or plans of reorganization in the U.S. Debtors' chapter 11 cases in respect of such General Claim, Rejection Claim or Amended Schedule Claim, as applicable, 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 applicable Bar Date, and without regard to the subsequent discovery or existence of such different or additional facts.

**RESERVATION OF RIGHTS**

The U.S. Debtors reserve the right to dispute, or to assert offsets or defenses against, any claim asserted against them. Nothing in this Notice shall preclude the U.S. Debtors from objecting to any claim asserted against any of them on any grounds.

**PROCEDURE FOR FILING PROOFS OF CLAIM**

A signed original of a completed proof of claim, together with any accompanying or supporting documentation, must be delivered to the U.S. Debtors' claims agent at one of **the following addresses: (i) if by first-class mail, The Garden City Group, Inc., Claims Agent for Federal-Mogul, P.O. Box 8872, Melville, New York 11747-8872, or (ii) if by hand delivery or overnight mail, The Garden City Group, Inc., Claims Agent for Federal-Mogul, 105 Maxess Road, Melville, New York 11747** so as to be received no later than 4:00 p.m. Eastern time on March 3, 2003 or the Rejection Bar Date or Amended Schedule Bar Date, if applicable.

The Debtors have enclosed with this notice a Court-approved proof of claim form on which General Claims, Rejection Claims, and Amended Schedule Claims may be filed. Alternatively, you may use Official Bankruptcy Form No. 10 to file such claims.

All filed proofs of claim must (i) be written in English; (ii) be denominated in lawful currency of the United States; and (iii) conform substantially with the enclosed proof of

claim form and/or Official Bankruptcy Form No. 10. Proofs of claim may be submitted in person or by courier service, hand delivery or mail addressed to the U.S. 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 U.S. Debtors' claims agent. If you wish to receive acknowledgement of receipt of your proof of claim, you must also submit, by the applicable 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 your Claim.

Additional information regarding the filing of a proof of claim, and information about the Debtors' businesses, including prior trade names, and business locations may be obtained from the Federal-Mogul Claims Helpline at (888) 212-5571 or visiting the Federal-Mogul Claims Website at <http://www.fmoclaims.com>. Questions may also be addressed in writing to the U.S. Debtors' claims agent at the following address: The Garden City Group, Inc., Claims Agent for Federal-Mogul, P.O. Box 8872, Melville, New York 11747-8872. The register of claims asserted against the U.S. Debtors will be available for review during normal business hours at the offices of the U.S. Debtors' claims agent identified above.

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

Dated: Wilmington, Delaware  
September 24, 2002

BY ORDER OF THE COURT

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ATTORNEYS FOR DEBTORS  
AND DEBTORS IN POSSESSION

