

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 15
	)	
HOLLINGER INC., <u>et al.</u> , ¹	)	Case No. 07-11029 (PSJ)
	)	
Debtors in Foreign Proceedings.	)	Joint Administration Proposed
	)	
_____	)	Re: D.I. <u>4</u>

**ORDER SCHEDULING HEARING AND SPECIFYING THE FORM
AND MANNER OF SERVICE OF NOTICE OF FILING OF PETITIONS
PURSUANT TO CHAPTER 15 OF THE BANKRUPTCY CODE**

Upon the Motion (the "Motion") of Hollinger Inc., ("Hollinger") as foreign representative of Hollinger and its affiliated captioned debtors and participants (collectively, with Hollinger, the "Debtors") in a proceeding (the "Canadian Proceeding") under Canada's *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended (the "CCAA"), pending before the Ontario Superior Court of Justice (Commercial List) (the "Canadian Court") for entry of an order specifying the form and manner of service, including by way of publication of a notice (the "Notice") (annexed to the Motion as Exhibit "B"), of the Debtors' chapter 15 petitions, and documents related thereto, filed pursuant to chapter 15 of title 11 of the United States Code (the "Bankruptcy Code") commencing the Debtors' chapter 15 cases ancillary to a foreign proceeding and seeking recognition of such foreign proceeding as a "foreign main proceeding" and relief in aid thereof; and the Court having jurisdiction to consider the Motion

¹ These jointly administered cases are those of the following debtors: Hollinger Inc.; Sugra Limited; and 4322525 Canada Inc., f/k/a 504468 N.B. Inc.

and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334; and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. § 1410;

IT IS HEREBY ORDERED THAT:

1. The form of the Notice is hereby approved.
2. Copies of the Notice, the Debtors' chapter 15 petitions and the documents filed in support thereof (collectively, the "Supporting Documents") shall be served by United States mail, first-class postage prepaid or by overnight courier, within five (5) business days of the Petition Date,² upon the Debtors, all administrators in foreign proceedings of the Debtors, all other parties (or their counsel) known to the Debtors against whom provisional relief is sought under section 1519 of the Bankruptcy Code, including any such parties (or counsel) that have addresses outside the United States, and all parties to any litigation in which any of the Debtors is a party and that is pending in the United States as of the Petition Date, in accordance with Bankruptcy Rule 2002(q).

3. The Notice, substantially in the form attached to the Motion, shall be published in *The Wall Street Journal* (U.S. Edition) within five (5) business days of the Petition Date or as soon thereafter as practicable.

4. If any party files a notice of appearance in this case, Hollinger shall serve the Supporting Documents upon such party within three (3) business days of the filing of such notice of appearance if such documents have not already been served on such party (or its counsel).

² All terms not defined herein shall have the meaning ascribed to them in the Motion.

5. Service of the Supporting Documents and publication of the Notice in accordance with this Order is hereby approved as adequate and sufficient notice and service of the Supporting Documents on all interested parties.

6. Motions or answers, if any, in response to the Supporting Documents must be in writing describing the basis therefor and the nature and extent of the respondent's interests in the Debtors' estates and shall be filed with the Court electronically and served upon Morris, Nichols, Arsht & Tunnell LLP, 1201 North Market Street, Wilmington, Delaware 19899-1347 (Attention: Derek C. Abbott) and Weil, Gotshal & Manges LLP, 757 Fifth Avenue, New York, New York, 10153 (Attention: Marcia L. Goldstein), counsel to Hollinger, so as to be received on or before August 27 2007 at 4:00 p.m. Eastern time.

7. A hearing on the relief sought in the Debtors' chapter 15 petitions as well as motions or answers, if any, in response to the Supporting Documents shall be held on August 28 2007 at 10:00 a.m., Eastern time, or as soon thereafter as counsel shall be heard, in Room 2 of the United States Bankruptcy Court, 824 Market Street, Wilmington, Delaware 19801.

8. All notice requirements specified in section 1514(c) of the Bankruptcy Code are hereby waived.

9. Bankruptcy Rule 1010 does not apply to the Debtors' petitions seeking recognition of a foreign main proceeding and, accordingly, the summons requirement in Bankruptcy Rule 1011(b) is inapplicable.

10. Service pursuant to this Order shall be good and sufficient service and adequate notice of the hearing to consider the Debtors' chapter 15 petitions and Hollinger's request for an order granting recognition of the Debtors' foreign proceeding as a "foreign main proceeding" and for relief, including the automatic stay. The provisions of section 1514(c) regarding

notification of foreign creditors of the time and place (and with respect to secured creditors, the need) for filing proofs of claim is inapplicable to this proceeding.

11. This Court shall retain jurisdiction with respect to all matters relating to the interpretation or implementation of this Order.

Dated: August 7, 2007
Wilmington, Delaware


UNITED STATES BANKRUPTCY JUDGE

Exhibit B

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

In re:	)	Chapter 15
	)	
HOLLINGER INC., <u>et al.</u> , ¹	)	Case No. 07-_____ ()
	)	
Debtors in Foreign Proceedings.	)	Joint Administration Proposed
	)	

**NOTICE OF FILING AND HEARING ON PETITION UNDER
CHAPTER 15 OF THE UNITED STATES BANKRUPTCY CODE**

PLEASE TAKE NOTICE, on August 1, 2007, Hollinger Inc., ("Hollinger") as foreign representative of Hollinger and its affiliated captioned debtors and participants (collectively, with Hollinger, the "Debtors"), in a proceeding (the "Canadian Proceeding") under Canada's *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended (the "CCAA"), pending before the Ontario Superior Court of Justice (Commercial List) (the "Canadian Court"), filed petitions (the "Chapter 15 Petitions") under chapter 15 of title 11 of the United States Code (the "Bankruptcy Code") commencing the Debtors' chapter 15 cases ancillary to the Canadian Proceeding and seeking recognition of such foreign proceeding as a "foreign main proceeding" and relief in aid of the Canadian Proceeding in the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court") with respect to the Debtors.

PLEASE TAKE FURTHER NOTICE, that copies of the Official Form Chapter 15 Petitions are attached hereto, along with (i) the list required to be filed with the Chapter 15 Petitions pursuant to Bankruptcy Rule 1007(a)(4); (ii) the Statement of Foreign Representative of the foreign proceeding required to be filed pursuant to Bankruptcy Code section 1515; (iii) the Debtors' Motion for Temporary Restraining Order and, After Notice and a Hearing, a Preliminary Injunction Granting Provisional Relief Under 11 U.S.C. § 1519(a); (iv) the Declaration of G. Wesley Voorheis, Chief Executive Officer of Hollinger Inc., in Support of (I) Petitions for Recognition of Canadian Proceeding Under 11 U.S.C. § 1515; (II) Debtors' Motion for Order Directing Joint Administration of Chapter 15 Bankruptcy Cases Under Fed. R. Bankr. P. 1015(b); and (III) Debtors' Motion for Temporary Restraining Order and, After Notice and a Hearing, a Preliminary Injunction Granting Provisional Relief Under 11 U.S.C. § 1519(a); and (v) the Scheduling Order, as defined below, (collectively, the "Supporting Documents") which were filed in support of and contemporaneously with the Chapter 15 Petitions.

¹ These jointly administered cases are those of the following debtors: Hollinger Inc.; Sugra Limited; and 4322525 Canada Inc., f/k/a 504468 N.B. Inc.

PLEASE TAKE FURTHER NOTICE, that pursuant to the Order Scheduling Hearing and Specifying the Form and Manner of Service of Notice of Filing of Petitions Pursuant to Chapter 15 of the Bankruptcy Code, dated August __, 2007 (the "Scheduling Order"), the Bankruptcy Court has scheduled a hearing on August __, 2007 at __: __.m. Eastern time before the Honorable _____ in Room __ of the United States Bankruptcy Court, 824 North Market Street, Third Floor, Wilmington, Delaware 19801 (the "Hearing").

PLEASE TAKE FURTHER NOTICE, that any party in interest wishing to submit a response or objection to the Chapter 15 Petitions or the relief requested by Hollinger must do so pursuant to the Bankruptcy Code and the Local and Federal Rules of Bankruptcy Procedure, including, without limitation, rule 1011 of the Federal Rules of Bankruptcy Procedure, in writing and setting forth the bases therefor and the nature and extent of the respondent's interests in the Debtors' estates, such response or objection must be filed with the Office of the Clerk of the Court, 824 Market Street, Third Floor, Wilmington, Delaware 19801, and served on the attorneys for Hollinger, Morris, Nichols, Arshat & Tunnell LLP, 1201 North Market Street, Wilmington, Delaware 19899-1347 U.S.A., Attn: Derek C. Abbott, Esquire, and Weil, Gotshal & Manges LLP, 757 Fifth Avenue, New York, New York, 10153 U.S.A., Attn: Marcia L. Goldstein, Esquire, so as to be received by them no later than 4:00 p.m. Eastern time, August __, 2007.

PLEASE TAKE FURTHER NOTICE, that all parties in interest opposed to the Chapter 15 Petitions or Hollinger's request for relief must appear at the Hearing at the time and place set forth above.

PLEASE TAKE FURTHER NOTICE, that the Hearing may be adjourned from time to time without further notice other than an announcement in open court at the Hearing of the adjourned date or dates or any further adjourned hearing.

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PLEASE TAKE FURTHER NOTICE, that if no response or objection is timely filed and served as provided above, the Bankruptcy Court may grant the recognition and relief requested by the Petitioner without further notice or hearing. Copies of the Chapter 15 Petitions and the Supporting Documents will be made available upon request at the Office of Hollinger's counsel at Morris, Nichols, Arsht & Tunnell LLP, 1201 North Market Street, Wilmington, Delaware 19899-1347 U.S.A., Attn: Derek C. Abbott, Esquire.

Dated: August ____, 2007
Wilmington, Delaware

BY ORDER OF THE BANKRUPTCY COURT

MORRIS, NICHOLS, ARSHT & TUNNELL LLP
Derek C. Abbott (No. 3376)
Kelly M. Dawson (No. 4786)
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(302) 658-9200

-and-

WEIL, GOTSHAL & MANGES LLP
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*Counsel for the Debtors
Hollinger Inc., et al.*