

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

40-7580

In re: )  
 )  
FANSTEEL INC., et al.,<sup>1</sup> ) 02-CV-44 (JJF)  
 )  
 )  
Debtor. )

Objection Deadline: February 20, 2002 at 4:00 p.m.  
Hearing Date: Hearing Held Only If Necessary

**MOTION OF DEBTORS TO SHORTEN NOTICE OF TIME PERIOD AND TO  
APPROVE FORM AND MANNER THEREOF**

Debtors and Debtors-in-Possession (the "Debtors") in the above captioned cases, by and through their undersigned counsel, hereby move (the "Motion") this Court pursuant to Rule 2002 of the Federal Rule of Bankruptcy Procedure (the "Bankruptcy Rules"), Section 102 of chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"), for entry of an order providing that the notice period with respect to the attached **Motion for Entry of An Order Pursuant to 11 U.S.C. Section 105 and 363 Authorizing Debtors to Make Payments to Congress Financial Corporation Necessary for Diligence, Negotiation, Preparation and Documentation of a Debtor in Possession Financing Facility** ("Congress Motion") be shortened as set forth below.

1. The Debtors seek Court approval to Shorten the Notice Period for the Congress Motion so that Congress Financial Corporation can immediately begin the due

<sup>1</sup> The Debtors are the following entities: Fansteel Inc.; Fansteel Holdings, Inc.; Custom Technologies Corp., Escast, Inc., Wellman Dynamics Corp., Washington Mfg. Co., Phoenix Aerospace Corp., American Sintered Technologies, Inc., and Fansteel Schulz Products, Inc.

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diligence necessary in order to make a firm commitment or definitive documentation for Debtor in Possession financing. Service will be effected by overnight delivery or by hand delivery to local recipients.

2. Additionally, Debtors seek an order from this Court requiring that objections, if any, to the Congress Motion be filed with the Court and served upon both undersigned counsel and co-counsel on or before February 20, 2002, at 4:00 p.m. Prevailing Eastern Time and providing that a hearing will be held only if objections or responses are filed.

3. In addition to shortening the time period for the notice period for the motion, the Debtors also request that the Court approve the attached Notice that sets forth a period of 7 days for filing objections to the Congress Motion and requiring a hearing only if objections or responses are filed. The Debtors submit that the form of notice is proper under 11 U.C.S. §102 of Bankruptcy Rule 2002(m).

**WHEREFORE**, Debtors respectfully request the entry of an Order approving the timing and attached form of Notice and providing that notice of the attached Congress Motion.

Dated: February 12, 2002

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and

PACHULSKI, STANG, ZIEHL, YOUNG & JONES P.C.



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Laura Davis Jones (Bar No. 2436)  
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Co-Counsel for the Debtors and  
Debtors in Possession

SO ORDERED this \_\_\_ day  
of \_\_\_\_\_, 2001

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Honorable Joseph J. Farnan, Jr.  
United States District Court

THE UNITED STATES DISTRICT COURT  
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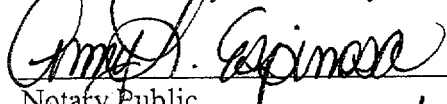
**AFFIDAVIT OF SERVICE**

Louise L. Tuschak being duly sworn according to law, deposes and says that she is employed by the law firm of Pachulski, Stang, Ziehl, Young & Jones P.C., and that on the 13<sup>th</sup> day of February 2002, she caused a copy of the following document(s) to be served upon the attached service lists in the manner indicated:

**MOTION OF DEBTORS TO SHORTEN NOTICE OF TIME PERIOD AND TO APPROVE FORM AND MANNER THEREOF**

  
Louise L. Tuschak

Sworn to and subscribed before  
me this 13<sup>th</sup> day of February 2002

  
Notary Public  
My Commission Expires: 01/13/03

<sup>1</sup> The Debtors are the following entities: Fansteel Inc.; Fansteel Holdings, Inc., Custom Technologies Corp., Escast, Inc., Wellman Dynamics Corp., Washington Mfg. Co., Phoenix Aerospace Corp., American Sintered Technologies, Inc., and Fansteel Schulz Products, Inc.