

MEDIPRO

Worksheet for Claims and
Proposed Treatment

Players

Pre-Bankruptcy

- Corporation
- Directors
- Officers
- Employees
- Shareholders
- Bondholders
- Creditors
- Customers
- Suppliers

Post - Bankruptcy

- Judge
- U.S. Trustee
- Creditors' Committee
- Bondholder Committee
- Equityholder Committee
- Individual Creditors
- Debtor-in-Possession (DIP)

Powers

- Automatic Stay
- Use, Sale or Lease of Property
- Obtaining Credit
 - unsecured
 - super-priority/super-lien
- Executory Contracts and Unexpired Leases
- Avoiding Powers
 - preferences
 - fraudulent transfers
 - strong-arm

<u>Claim</u>	How <u>Satisfied</u>	<u>Amount</u>
Administration Expenses		
(i) Attorney's and accountant's fees	(i) Cash	
(ii) Unpaid costs of Chapter 11	(ii) Cash	

<u>Claim</u>	<u>How Satisfied</u>	<u>Amount</u>
Class 1 - Priority Claims	(i) Cash	
(i) Salaries and Wages	(ii) Assumption/ Continuation/ Freeze	
(ii) Employee Benefit Plans	(iii) Cash; Merchandise Vouchers	
(iii) Consumer Deposits		

<u>Claim</u>	<u>How Satisfied</u>	<u>Amount</u>
Class 2 - Unsecured Priority Tax Claims		
(i) FICA	(i) - (iii) Cash	
(ii) Fed. & State Withholdings		
(iii) Deferred Income Taxes		

How
Satisfied Amount

Claim

Class 3 - Secured

Tax Claims

(i) Property Taxes

(i) Cash

Class 4 - \$(3.5) (350) mm
Secured Claim: Bk/Boston

Revised payment Value of
schedule Bk's
collateral

Class 5 - \$(1.875) (190) mm
Secured Claim: State Bk

Claim

How
Satisfied

Amount

Class 6 -

General Unsecured Claims

- (i) \$2.25(225) mm trade debt
- (ii) \$1.275(130) mm Customer
advance
- (iii) Bank Deficiency Claims

Claim

How

Satisfied

Amount

(iv) Lease Rejection Claims

(v) Claim of MediPlastecs
(disputed)

(vi) Personal Injury/
Wkrs. Comp.
Claims of 3 employees
(disputed)

Claim

How Satisfied
Amount

(vii) Alleged
“tainted blood”
suit (disputed)

Class 7 - \$(.55) (550)mm
Convertible/ Sub. Note

Class 8 - Interest
of Common Stockholders

CRAM DOWN

- At least one impaired class has accepted the Plan
- Plan does not discriminate unfairly
- Plan is fair and equitable

CRAM DOWN

Secured Claim

- Retain lien to extent of allowed amount and
- Receive deferred cash payments the PV of which equals the value of the lesser of the allowed amount or collateral value

CRAM DOWN

Unsecured Claim

- Receive property of a value equal to allowed amount, i.e. 100% payment OR
- No holder of a junior claim or interest receives anything
- New value exception?