IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re: : Chapter 11

:

SAAB CARS NORTH AMERICA, INC., : Case No. 12-10344 (CSS)

:

Debtor.

NOTICE OF FIXING ADMINISTRATIVE EXPENSE BAR DATE AND PROCEDURES FOR FILING PROOFS OF CLAIM FOR ADMINISTRATIVE EXPENSES

TO ALL PERSONS AND ENTITIES ASSERTING ADMINISTRATIVE EXPENSE CLAIMS AGAINST THE ESTATE OF THE ABOVE-CAPTIONED DEBTOR:

PLEASE TAKE NOTICE THAT on June 11, 2013, the Court entered an order (the "Administrative Expense Bar Date Order") establishing **July 8, 2013 at 4:00 p.m.** (**Eastern Time**) (the "Administrative Expense Bar Date"), as the last date and time for the filing of proofs of claim for Administrative Expenses against Saab Cars North America, Inc. (the "Debtor"). The Administrative Expense Bar Date and the procedures set forth below for the filing of proofs of claim apply to all Administrative Expense claims against the Debtor that arose or will arise between February 24, 2012 and the expected Effective Date of the proposed Joint Plan of Liquidation, which the Plan Proponents expect will occur on or about July 15, 2013 (the "Administrative Expense Period"). **THIS NOTICE DOES NOT APPLY TO CLAIMS ARISING PRIOR TO FEBRUARY 24, 2012.** Please note that each person asserting an administrative expense claim must estimate the amount of the administrative expense claim through the expected Effective Date of the proposed Joint Plan of Liquidation.

1. WHO MUST FILE A PROOF OF CLAIM

You **MUST** file a proof of claim if you believe that you are entitled to an Administrative Expense claim that arose during the Administrative Expense Period, and such claim is not one of the types described in section 2 below.

Administrative Expense claims are specifically described in sections 503 and 507 of the Bankruptcy Code. Among other things, these sections provide that certain types of claims are entitled to administrative expense priority, including, without limitation: (i) the actual, necessary costs and expenses of preserving the estate, including wages, salaries or commissions for services rendered after February 24, 2012; (ii) certain taxes and penalties related thereto; (iii) compensation and reimbursement of certain officers; and (iv) the actual, necessary expenses incurred by (a) certain creditors, (b) a creditor, an indenture trustee, an equity security holder, or a committee representing any such entities, in making a substantial contribution to a debtor's chapter 11 case, (c) a custodian, (d) members of certain committees if incurred in the performance of the duties of such committees.

2. WHO SHOULD NOT FILE A PROOF OF CLAIM

You should not file a proof of claim if:

- A. You have already properly filed your Administrative Expense claim;
- B. Your Administrative Expense claim has been previously allowed by an order or orders of the Bankruptcy Court;
- C. You are a professional retained pursuant to section 327, 328, 330, 331, 363 or 503(b) of the Bankruptcy Code by the Debtor or the statutory committee of unsecured creditors appointed in this chapter 11 case;
- D. You are the United States Trustee and are making a claim in connection with fees due under 28 U.S.C. section 1930; or
- E. You are a governmental unit with a claim or interest described in 11 U.S.C. 503(b)(1)(B) and (C), in accordance with 11 U.S.C. § 503(b)(1)(D).

If your claim falls within any of the above categories, your rights as the holder of such claim will be preserved without your filing of a proof of claim. Any other person or entity <u>must</u> file a proof of claim, as described herein, before July 8, 2013.

3. WHEN AND WHERE TO FILE

Except as provided for herein, proofs of claim must be filed so as to be **received on or before July 8, 2013 at 4:00 p.m.**, (**Eastern Time**) by Donlin, Recano & Company, Inc. ("DRC") by either of the two methods set forth below:

if by mail: Donlin, Recano & Company, Inc.

RE: Saab Cars North America, Inc.

P.O. Box 2019 Murray Hill Station New York, NY 10156

if by hand-delivery or overnight courier:

Donlin, Recano & Company, Inc. RE: Saab Cars North America, Inc. 419 Park Avenue South, Suite 1206 New York, NY 10016

Proofs of claim sent by email, facsimile or telecopy will *not* be accepted. Note that proofs of claim will be deemed timely filed only if **actually received** by DRC on or before the Administrative Expense Bar Date.

4. WHAT TO FILE

If you file a proof of claim, your filed proof of claim must: (i) be written in the English language; (ii) be denominated in lawful currency of the United States; and (iii) conform substantially with the proof of claim form, enclosed.

You should attach to your completed proof of claim form copies of any writings upon which such administrative expense claim is based.

EXCEPT WITH RESPECT TO CLAIMS OF THE TYPE SET FORTH IN SECTION 2 ABOVE, ANY CREDITOR WHO FAILS TO FILE AN ADMINISTRATIVE PROOF OF CLAIM ON OR BEFORE JULY 8, 2013 FOR ANY CLAIM SUCH CREDITOR HOLDS OR WISHES TO ASSERT AGAINST THE DEBTOR, WILL BE FOREVER BARRED, ESTOPPED, AND ENJOINED FROM ASSERTING SUCH ADMINISTRATIVE EXPENSE CLAIM (OR FILING A PROOF OF CLAIM WITH RESPECT TO SUCH ADMINISTRATIVE EXPENSE CLAIM) AGAINST THE DEBTOR, THE PLAN TRUST, AND EACH OF THEIR RESPECTIVE PROPERTIES WILL BE FOREVER DISCHARGED FROM ANY AND ALL INDEBTEDNESS OR LIABILITY WITH RESPECT TO SUCH ADMINISTRATIVE EXPENSE CLAIM.

A CLAIMANT SHOULD CONSULT AN ATTORNEY REGARDING ANY INQUIRIES, SUCH AS WHETHER SUCH CLAIMANT SHOULD FILE AN ADMINISTRATIVE PROOF OF CLAIM.

DATED: Wilmington, Delaware June 11, 2013

STEVENS & LEE, P.C.

/s/ Maria Aprile Sawczuk

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-and-

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