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**Debtors' First Omnibus Motion for Entry of an Order Authorizing the Rejection of Executory Contracts Related to Certain Financial Services (the "Rejection Motion").**

By the Rejection Motion, the Debtors seek entry of an order authorizing the Debtors to reject certain executory contracts related to various financial services (the "Finance Contracts") effective as of the date an order is entered authorizing such relief.

The Debtors assert that the Finance Contracts are neither necessary for, nor beneficial to the Debtors' ongoing businesses, and to the extent the Finance Contracts are executory they create an unnecessary and burdensome expense for the Debtors and their estates. The Debtors have placed the Finance Contracts they are seeking to reject into five categories: (i) Administrative Account Agreements; (ii) International Swap Dealer Association (ISDA) Master Agreements; (iii) Investment Banking Agreements; (iv) Sarbanes-Oxley Consulting Agreement; and (v) Tax Advisory Agreements.

*Administrative Account Agreements*

Prior to the petition date, certain Debtors maintained separate bank accounts with Citigroup or Wachovia Bank N.A. ("Wachovia"). At the time the bank accounts were opened, the Debtors entered into various additional Administrative Account Agreements with the banks in order to facilitate the orderly administration of the accounts. The Debtors have since closed all of the Wachovia and Citigroup bank accounts at issue and, therefore, seek to reject the related Administrative Account Agreements as they are no longer necessary to the Debtors' ongoing businesses.

*ISDA Master Agreements*

The Debtors are party to three pre-petition ISDA Master Agreements which govern a hedging program between the Debtors, Citibank and Bank of America. The Debtors instituted the hedging program in an effort to minimize the risks associated with the price paid by the Debtors to purchase gas. The Debtors assert that they have discontinued their hedging program and no longer require the ISDA Master Agreements.

*Investment Banking Agreements*

Prior to the petition date, the Debtors entered into two Investment Banking Agreements with Merrill Lynch & Co. ("Merrill"), and one with Citigroup Global ("Citigroup") related to the exploration and consideration of strategic business alternatives, including the potential marketing and sale of assets. The Debtors contend that the potential sales contemplated by the Investment Banking Agreements never materialized, and the Debtors are no longer utilizing the services of either Merrill or Citigroup as described in the Investment Banking Agreements.

*Sarbanes Oxley Consulting Agreement*

The Debtors seek to reject a pre-petition Sarbanes Oxley Consulting Agreement between Eisner LLP ("Eisner") and Chemtura pursuant to which Eisner advised Chemtura on various Sarbanes Oxley matters on an "as needed" basis. The Debtors have not used Eisner's services since 2008 and contend that they no longer require the services contemplated by the Sarbanes Oxley Consulting Agreement.

Tax Advisory Agreements

Various Debtor entities are party to several Tax Advisory Agreements with Ryan Inc., Ducharme McMillen & Associates Inc., and Nationwide Consulting Company (collectively the “Tax Advisors”), pursuant to which the Tax Advisors assisted the Debtors with sales and use tax overpayment reviews, and potential income tax and real estate tax refunds and savings. The Debtors are no longer utilizing the services of the Tax Advisors and thus seek to reject the related Tax Advisory Agreements.

***A hearing will be held on the Rejection Motion on November 18, 2009 at 9:45 a.m. (ET), with a corresponding objection deadline of November 13, 2009 at 4:00p.m. (ET).***