

Exhibit B to Scheduling Order

Discovery Procedures

Coordination Among Aligned Parties

A. The Debtors anticipate that there will be a number of parties whose interests are substantially aligned with respect to Plan confirmation issues. For example, the Secured Noteholder Group will be aligned with the Debtors (collectively, the "Plan Proponents"). Similarly, the Debtors anticipate that all of the unsecured creditors likely will take the same position with respect to the value of the Debtors' upon emergence from chapter 11. In order to prevent parties from distracting the Debtors' management with duplicative depositions, to limit litigation costs and professional fees incurred by the Debtors' estates and to conserve judicial resources, the Debtors request that each of the following parties (each a "Party, and collectively, the "Parties) be treated as single party for purposes of discovery in connection with Plan confirmation:

1. The Secured Noteholders: the Secured Noteholder Group and U.S. Bank National Association, as indenture trustee and collateral trustee;
2. The Committee: the Committee, the Unsecured Noteholder Group, Deutsche Bank Trust Company Americas, as indenture trustee, and all other unsecured creditors; and
3. The Debtors

B. Each Party will be treated as a single party for all purposes including:

Each Party shall, to the extent possible, cooperate to act through one liaison counsel for purposes of discovery, briefing, presenting argument at court hearings and participating in negotiations regarding Plan issues;

Each Party shall, to the extent possible, cooperate among similarly situated parties for purposes of serving and responding to discovery, taking and defending depositions, filing motions, briefs and any other pleading with respect to discovery and examining and presenting witnesses at the Confirmation Hearing.

Discovery Schedule

In order to streamline the discovery process and minimize expenses, the Debtors request that pursuant to section 105(d)(2) of the Bankruptcy Code and Bankruptcy Rule 7016, the Court enter an order imposing the following discovery schedule (the "Discovery Schedule):

Each Party who wishes to conduct document discovery from another Party shall serve written document requests under Bankruptcy Rule 7035 on or before April 15, 2008. No Party may serve interrogatories to parties under Bankruptcy Rule 7033 or

requests for admission under Bankruptcy Rule 7036. Such process as is necessary to compel compliance by third parties may be served after April 15, 2008.

On or before April 24, 2008, the Plan Proponents must identify the name, employer, business address and expected area of testimony of any fact witness that they may present at the Confirmation Hearing. The Committee shall furnish a list containing the same information for any fact witness that it may present at the Confirmation Hearing on or before May 1, 2008 (except that the Committee may supplement its list by naming additional witnesses and providing the required information for such additional witnesses on or before May 5 and, if it does so, any newly disclosed witnesses may be deposed during the period from May 6, 2008 through June 5, 2008).

On May 2, 2008, all Parties participating in fact and expert discovery relating to Plan Confirmation shall have an informal teleconference to discuss discovery issues, schedule depositions and address any potential discovery disputes.

On or before April 30, 2008, the Parties and Advisors shall respond to written discovery by producing documents, subject to any objections and claims of privilege. (For purposes of this paragraph, "Advisors" shall include Alvarez & Marsal, LLP, Houlihan Lokey Howard & Zukin Inc. and Perella Weinberg Partners LP). In the event that any documents are withheld on the grounds of privilege, the Party or Advisor shall produce and deliver a privilege log in accordance with Bankruptcy Rule 7026, to be received no later than three (3) days after the date upon which the Party or Advisor would have otherwise been required to produce such documents.

During the period from May 1, 2008 through May 30, 2008, the Parties shall conduct fact witness depositions in accordance with a schedule to be determined by agreement of the Parties with the understanding that a fact witness from the Debtors shall be the first person deposed. Each deposition shall last no longer than seven (7) hours. Each Party will use its best efforts to restrict its questioning to those matters that have not been addressed by any other Party so as to prevent duplication.

In order to present expert testimony at the Confirmation Hearing, each Party must provide each of the other Parties with a report within the meaning of Federal Rule of Civil Procedure 26(a)(2)(B) for such Party's expert no later than June 2, 2008.

On or before June 9, 2008, the Parties shall produce rebuttal reports, if any, for any of the expert reports received from the other Parties.

During the period from June 10, 2008 through June 18, 2008, the Parties may depose the other Parties' experts. Each deposition shall last no longer than seven (7) hours. Each Party will use its best efforts to restrict its questioning to those matters that have not been addressed by any other Party so as to prevent duplication.

On June 18, 2008, all discovery with respect to the Plan and the Confirmation

Hearing shall be completed.

Modification of Discovery Schedule

The Discovery Schedule may be modified by: (1) written agreement of the Parties (without the need for Court approval as long as the modification does not affect any date on which the Court is scheduled to receive a written submission or conduct a hearing); or (2) order of the Court (only upon the filing of a motion that includes a verified statement that prior to filing the motion, the Party has met and conferred with the opposing Party in a good faith attempt to resolve the dispute).