

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
GSE ENVIRONMENTAL, INC., <i>et al.</i> , ¹)	Case No. 14-11126 (MFW)
)	
Debtors.)	(Joint Administration Requested)
)	

NOTICE OF HEARING ON FIRST DAY MOTIONS

PLEASE TAKE NOTICE that on May 4, 2014 (the "Petition Date"), the above-captioned debtors (collectively, the "Debtors") each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the "Bankruptcy Code"), with the Clerk of the United States Bankruptcy Court for the District of Delaware. The Debtors are operating their businesses as debtors in possession under sections 1107(a) and 1108 of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE that together with their chapter 11 petitions, on the Petition Date, the Debtors filed their joint chapter 11 plan [Docket No. 19] and the accompanying disclosure statement [Docket No. 20]. The Debtors also filed the following application and motions set forth below (collectively, the "First Day Motions"). A hearing to consider the First Day Motions (the "First Day Hearing") will be held on **May 6, 2014, at 11:30 a.m. (prevailing Eastern Time)**, before the Honorable Mary F. Walrath, at the United States Bankruptcy Court for the District of Delaware (the "Court"), located at 824 North Market Street, 5th Floor, Courtroom No. 4, Wilmington, Delaware 19801.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: GSE Environmental, Inc. (1074); GSE Environmental, LLC (1539); GSE Holding, Inc. (9069); and SynTec, LLC (2133). The location of the Debtors' service address is: 19103 Gundle Road, Houston, Texas 77073.

First Day Administrative and Scheduling Motions

1. Debtors' Motion for Entry of an Order Directing Joint Administration of Chapter 11 Cases
2. Debtors' Application for Appointment of Prime Clerk LLC as Claims and Noticing Agent
3. Debtors' Motion for Entry of an Order Authorizing the Debtors to File a Consolidated List of Creditors in Lieu of Submitting a Separate Mailing Matrix for Each Debtor
4. Debtors' Motion for Entry of Interim and Final Orders (A) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (B) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Services, (C) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, and (D) Granting Related Relief

First Day Motion Pertaining to Financing

5. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Postpetition Financing, (II) Granting Liens and Providing Superpriority Administrative Expense Priority, (III) Authorizing Use of Cash Collateral, (IV) Granting Adequate Protection, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief

First Day Motions Pertaining to Business Operations

6. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses, (B) Continue Ordinary Course Incentive Programs for Non-Insiders, and (C) Continue Employee Benefits Programs and (II) Granting Related Relief
7. Debtors' Motion for Entry of Order (I) Authorizing the Debtors to (A) Continue to Operate the Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Bank Forms, and (D) Continue to Perform Intercompany Transactions, and (II) Granting Related Relief
8. Debtors' Motion for Entry of an Order (A) Authorizing the Payment of Certain Prepetition Taxes and Fees and (B) Granting Related Relief
9. Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing Debtors to Pay Certain Prepetition Claims of Critical Vendors and (B) Granting Related Relief

10. Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to (A) Pay Prepetition Claims of Shippers and Other Lien Claimants, (B) Pay Section 503(B)(9) Claims, and (C) Grant Administrative Expense Priority to All Undisputed Obligations for Goods and Raw Materials Ordered Prepetition and Delivered Postpetition and Satisfy Such Obligations in the Ordinary Course of Business and (II) Granting Related Relief
11. Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to (A) Continue Insurance Coverage Entered into Prepetition, (B) Enter Into New Insurance Policies, (C) Honor Their Prepetition Insurance Premium Financing Agreement, and (D) Renew Their Prepetition Financing Agreement in the Ordinary Course of Business, and (II) Granting Related Relief
12. Debtors' Motion for the Entry of an Order Authorizing the Debtors to Honor Certain Prepetition Obligations to Customers and to Otherwise Continue Certain Customer Programs the Ordinary Course of Business
13. Debtors' Motion for Entry of an Order Approving Continuation of Surety Bond Program

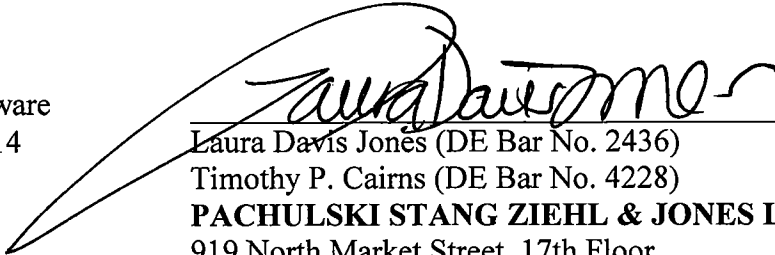
First Day Motion Pertaining to Trading Restrictions

14. Debtors' Motion for Entry of Interim and Final Orders Approving Notification and Hearing Procedures for Certain Transfers of, or Claims of Worthlessness with Respect to, Certain Equity Securities

PLEASE TAKE FURTHER NOTICE that copies of the First Day Motions can be obtained through the Court's website at www.deb.uscourts.gov, referencing Case No. 14-11126 (MFW), by accessing the Debtors' restructuring website at <http://cases.primeclerk.com/gse>, or by calling the Debtors' restructuring hotline at (844) 205-4335.

PLEASE TAKE FURTHER NOTICE that any and all objections to the First Day Motions may be made at the First Day Hearing.

Wilmington, Delaware
Dated: May 5, 2014



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