



INCORPORATED

U.S. DEPT. OF LABOR  
PUBLIC DISCLOSURE  
02/22/2002 13 PM 2:26

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Top Hat Plan Exemption  
Pension and Welfare Benefits Administration  
Room N-5644  
U.S. Department of Labor  
200 Constitution Avenue, NW  
Washington, DC 20210

2520032903054

Re: Top-Hat Plans

Ladies and Gentlemen:

On December 1st, 2001, RichardsApex, Inc. adopted the RichardsApex, Inc. Executive Deferred Compensation Plan (the "Plan"). The Plan first became subject to the Employee Retirement Income Security Act of 1974, as amended on December 1<sup>st</sup>, 2001.

The following information is provided on behalf of RichardsApex, Inc. pursuant to Department of Labor Regulation §2520.104-23:

1. Name of Employer: RichardsApex, Inc.
2. Address of Employer: 4202-24 Main Street  
Philadelphia, PA 19127
3. Employer's Employer Identification Number: 23-1322119
4. RichardsApex, Inc. maintains the Plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.
5. Number of employees covered by the Plan: 4

If you require additional information, please contact the undersigned at the letterhead address.

Sincerely,

Bradley N. Richards

*The global source for the metalworking industry...quality, experience, service.*

4202-24 MAIN STREET  
PHILADELPHIA, PA 19127 USA  
PHONE: 215 487-1100 FAX: 215 487-3090  
www.richardsapex.com

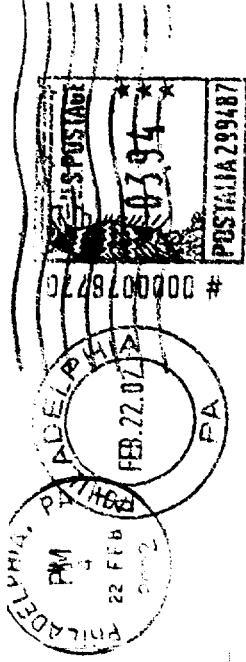


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