

2520043380201

SWIFT NEWSPAPERS, INC.
500 DOUBLE EAGLE COURT
RENO, NV 89511

November 15, 1998

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

Re: *Swift Newspapers, Inc. MBO/Deferred Compensation Plan*

Dear Sir or Madam:

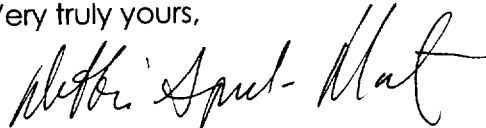
This notice is intended to satisfy the requirements of Department of Labor Regulation Section 2520.104-23 with respect to the above-referenced plan.

Swift Newspapers, Inc. maintains one plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees. The name of this plan is the Swift Newspapers, Inc. MBO/Deferred Compensation Plan. The number of employees who are participants in the plan is 23. (Swift Newspapers, Inc. does not maintain any other plans of this type.)

The address of Swift Newspapers, Inc. is 500 Double Eagle Court, Reno, Nevada 89511. The employer identification number of Swift Newspapers, Inc. is 91-1169487.

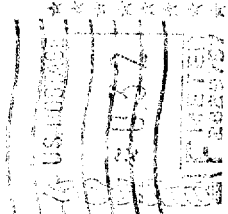
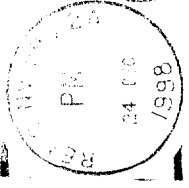
If you have any questions with regard to this matter or require any other information, please let me know.

Very truly yours,



Debbie Spieker-Martin
Corporate Director of Human Resources
Swift Newspapers, Inc.

SWIFT NEWSPAPERS, INC.
437 West Plumb Lane
Reno, NV 89509



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