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U.S. DEPT. OF LABOR
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Robert D. Webb
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December 8, 2006
20716-1

Via Certified Mail

Top Hat Plan Exemption
Employee Benefits Security Administration
Room N-1513
U.S. Department of Labor
200 Constitution Avenue, N.W.
Washington, DC 20210

Re: Reporting and Disclosure Compliance Statement

Dear Sir or Madam:

In accordance with Section 110 of the Employee Retirement Income Security Act of 1974, as amended and the alternative method under Section 2520.104-23 of the Labor regulations for complying with ERISA's reporting and disclosure requirements, enclosed for filing is a Reporting and Disclosure Compliance Statement for the top hat plan maintained by Haynes Management Company for the benefit of Mary Butler.

Very truly yours,

Robert D. Webb

RDW:tlp
Enclosure
cc: Mary Butler, Haynes Management, Inc. (w/enc.)

1586389_1.DOC

November 1, 2006

Via Certified Mail

Top Hat Plan Exemption
Employee Benefits Security Administration
Room N-1513
U.S. Department of Labor
200 Constitution Avenue, N.W.
Washington, DC 20210

Re: Retirement Agreement for Mary Butler
Reporting and Disclosure Compliance Statement

Dear Sir or Madam:

In accordance with Section 110 of the Employee Retirement Income Security Act of 1974, as amended ("ERISA") and the alternative method set forth in Department of Labor Regulation Section 2520.104-23 for compliance with the reporting and disclosure requirements of Part 1 of ERISA for unfunded or insured pension plans maintained by an employer for a select group of management or highly compensated employees (so-called "Top Hat Plans"), Haynes Management, Inc. (the "Employer") is filing this Reporting and Disclosure Compliance Statement with respect to the Deferred Compensation Agreement dated October 26, 2006 by and between the Employer and Mary Butler (the "Plan") and, in connection therewith, provides the following information:

Employer: Haynes Management, Inc.
Address: 34 Washington Street
Wellesley Hills, MA 02181

Effective Date of Plan: November 1, 2006
~~04-2110529~~

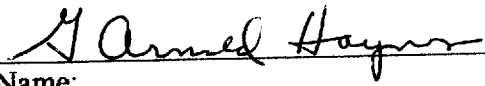
Employer's Taxpayer
Identification Number: 04-2210529

Number of additional "Top
Hat" plans maintained by the
Employer (and the Number of
Employees in Each): None

The Employer hereby declares that it maintains the Plan primarily for the purpose of providing deferred compensation to a select group of management or highly compensated employees of the Employer or affiliates of Employer designated by the Plan administrator. This submission does not constitute a declaration or admission that the Plan is an "employee benefit plan" within the meaning of Section 3(3) of ERISA; and all of the Employer's rights, claims and defenses, both substantive and procedural, with respect to ERISA's application to the Plan are expressly reserved. Without limiting the foregoing, the Employer will provide the Plan documents to the Secretary of Labor upon request, to the extent required by Section 104(a)(1) of ERISA.

Very truly yours,

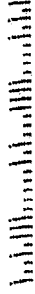
HAYNES MANAGEMENT, INC.

By: 
Name:
Title: President

Rt D. Webb/20716-1
Nutter

Nutter McClennen & Fish LLP ■ Attorneys at Law
World Trade Center West ■ 155 Seaport Boulevard ■ Boston, MA 02210-2604

Top Hat Plan Exemption
Employee Benefits Security Administration
Room N-1513
U.S. Department of Labor
200 Constitution Avenue, N.W.
Washington, DC 20210



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