

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
SOUTHEASTERN DIVISION

In re:	§	Chapter 11
	§	
BRIGGS & STRATTON	§	Case No. 20-43597-399
CORPORATION, <i>et al.</i> ,	§	
	§	(Jointly Administered)
	§	
Debtors.	§	Related Docket No. [●]

**[PROPOSED] ORDER SUSTAINING THE PLAN ADMINISTRATOR’S  
THIRTIETH OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY)**

Upon the objection (the “**Objection**”)<sup>1</sup> of the Plan Administrator in the above-captioned chapter 11 cases for entry of an order pursuant to section 502(b) of the Bankruptcy Code, Bankruptcy Rule 3007(d)(5), and Local Rule 3007(C) disallowing the claims listed on **Schedule 1** attached hereto and as more fully set forth in the Objection; and upon the *Declaration of Alan D. Halperin in Support of Plan Administrator’s Thirtieth Omnibus Objection to Claims (No Liability)* (attached to the Objection as **Exhibit B**); and this Court having jurisdiction to consider the Objection and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and consideration of the Objection and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and it appearing that venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and the Plan Administrator having represented that adequate and proper notice of the Objection has been given in accordance with the Omnibus Objection Procedures; and that no other or further notice need be given; and this Court having reviewed the Objection; and this Court having held a hearing to consider the relief requested in the Objection; and this Court having determined that the legal and factual bases set forth in the Objection establish just cause for the

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<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Objection.

relief granted herein; and it appearing that the relief requested in the Objection is in the best interests of the Plan Administrator and creditors; and upon all of the proceedings had before this Court and after due deliberation and sufficient cause appearing therefor, **it is hereby ORDERED that the Objection is SUSTAINED in that:**

1. Pursuant to section 502 of the Bankruptcy Code and Bankruptcy Rule 3007, each Claim listed on **Schedule 1** is disallowed.

2. The terms and conditions of this Order are effective immediately upon entry.

3. Nothing contained in the Objection or this Order is intended to be or shall be deemed as (i) an admission as to the validity of any claim against the Debtors or the Wind-Down Estates, (ii) a waiver of rights to dispute the amount of, basis for, or validity of any claim, (iii) a waiver of rights under the Bankruptcy Code or any other applicable nonbankruptcy law, (iv) an agreement or obligation to pay any claims, (v) a waiver of any claims or causes of action which may exist against any creditor or interest holder, or (vi) an approval, assumption, adoption, or rejection of any agreement, contract, lease, program, or policy under section 365 of the Bankruptcy Code.

4. The Plan Administrator is authorized to take all actions necessary or appropriate to carry out the relief granted in this Order.

5. Not later than two (2) business days after the date of this Order, the Plan Administrator shall serve a copy of the Order and shall file a certificate of service no later than twenty-four (24) hours after service.

DATED: \_\_\_\_\_, 2022  
St. Louis, Missouri

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Barry S. Schermer  
United States Bankruptcy Judge

**Order Prepared By:**

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Christopher J. Lawhorn, #45713MO  
Thomas H. Riske, #61838MO  
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-and-

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*Counsel to the Plan Administrator*

**SCHEDULE 1**

**Schedule of Claims**

Exhibit A  
Briggs & Stratton Corp., et al.

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		As Stipulated		Modified Claim Amount and		Basis for Proposed Modification
					Claim Amount and Priority		Claim Amount and Priority		Priority		
Ohio Bureau of Workers Compensation	20-10575	Billy Goat Industries, Inc.	120	11/18/2020	Secured:	\$0.00	Secured:	n/a	Secured:	\$0.00	Satisfied.
Legal Division Bankruptcy Unit PO Box 15567 Columbus, OH 43215-0567					Administrative:	\$0.00	Administrative:	n/a	Administrative:	\$0.00	
					Priority:	\$117.01	Priority:	n/a	Priority:	\$0.00	
					Unsecured:	\$0.00	Unsecured:	n/a	Unsecured:	\$0.00	
					Total:	\$117.01	Total:	n/a	Total:	\$0.00	
Dean C. And Janine M. Black	20-43597	Briggs & Stratton Corporation	1030	10/2/2020	Secured:	\$0.00	Secured:	n/a	Secured:	\$0.00	The Debtors have no liability for this litigation-related claim. The Debtors insurance policies in effect as of the date of the causes of action are "all-sums" policies that fully cover the related liability, if any.
Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101					Administrative:	\$0.00	Administrative:	n/a	Administrative:	\$0.00	
					Priority:	\$0.00	Priority:	n/a	Priority:	\$0.00	
					Unsecured:	\$50,000.00	Unsecured:	n/a	Unsecured:	\$0.00	
					Total:	\$50,000.00	Total:	n/a	Total:	\$0.00	
Elofic Industries Limited	20-43597	Briggs & Stratton Corporation	1412	10/5/2020	Secured:	\$0.00	Secured:	n/a	Secured:	\$0.00	This claim was amended and superseded claim #1412 filed on 10/6/2020.
J. Talbot Sant, Jr. 1610 Des Peres Road, Ste 100 St. Louis, MO 63131					Administrative:	\$138,929.00	Administrative:	n/a	Administrative:	\$0.00	
					Priority:	\$0.00	Priority:	n/a	Priority:	\$0.00	
					Unsecured:	\$158,319.04	Unsecured:	n/a	Unsecured:	\$0.00	
					Total:	\$297,248.04	Total:	n/a	Total:	\$0.00	
Elofic Industries Limited	20-43597	Briggs & Stratton Corporation	1412	10/5/2020	Secured:	\$0.00	Secured:	n/a	Secured:	\$0.00	This claim was amended and superseded claim #1412 filed on 10/6/2020.
J. Talbot Sant, Jr. 1610 Des Peres Road, Ste 100 St. Louis, MO 63131					Administrative:	\$138,929.00	Administrative:	n/a	Administrative:	\$0.00	
					Priority:	\$0.00	Priority:	n/a	Priority:	\$0.00	
					Unsecured:	\$158,319.04	Unsecured:	n/a	Unsecured:	\$0.00	
					Total:	\$297,248.04	Total:	n/a	Total:	\$0.00	
Heather Barks	20-43597	Briggs & Stratton Corporation	1553	10/7/2020	Secured:	\$0.00	Secured:	n/a	Secured:	\$0.00	Satisfied.
C/O Therese A. Schellhammer 123 South Second PO Box 1226 Poplar Bluff, MO 63902-1226					Administrative:	\$0.00	Administrative:	n/a	Administrative:	\$0.00	
					Priority:	\$674.40	Priority:	n/a	Priority:	\$0.00	
					Unsecured:	\$0.00	Unsecured:	n/a	Unsecured:	\$0.00	
					Total:	\$674.40	Total:	n/a	Total:	\$0.00	
Kimberly Barron	20-43597	Briggs & Stratton Corporation	1558	10/7/2020	Secured:	\$0.00	Secured:	n/a	Secured:	\$0.00	Satisfied.
C/O Therese A. Schellhammer 123 South Second PO Box 1226 Poplar Bluff, MO 63902–1226					Administrative:	\$0.00	Administrative:	n/a	Administrative:	\$0.00	
					Priority:	\$1,517.40	Priority:	n/a	Priority:	\$0.00	
					Unsecured:	\$0.00	Unsecured:	n/a	Unsecured:	\$0.00	
					Total:	\$1,517.40	Total:	n/a	Total:	\$0.00	
Laura Smyser	20-43597	Briggs & Stratton Corporation	2139	10/7/2020	Secured:	\$0.00	Secured:	n/a	Secured:	\$0.00	The claim is related to litigation, for which the Debtors were dismissed with prejudice from the underlying case.
C/O E. Kos Beckman Lawson, LLP 201 West Wayne Street Fort Wayne, IN 46802					Administrative:	\$0.00	Administrative:	n/a	Administrative:	\$0.00	
					Priority:	\$0.00	Priority:	n/a	Priority:	\$0.00	
					Unsecured:	\$0.00	Unsecured:	n/a	Unsecured:	\$0.00	
					Total:	\$0.00	Total:	n/a	Total:	\$0.00	
Lewis Alexander	20-43597	Briggs & Stratton Corporation	1233	9/18/2020	Secured:	\$0.00	Secured:	n/a	Secured:	\$0.00	Withdrawn by stipulation.
C/O Jon C. Goldfarb Wiggins Childs Pantazis Fisher Goldfarb LLC 301 19 St N Birmingham, AL 35203					Administrative:	\$0.00	Administrative:	n/a	Administrative:	\$0.00	
					Priority:	\$0.00	Priority:	n/a	Priority:	\$0.00	
					Unsecured:	\$0.00	Unsecured:	n/a	Unsecured:	\$0.00	
					Total:	\$0.00	Total:	n/a	Total:	\$0.00	
Linda F. Head	20-43597	Briggs & Stratton Corporation	1457	10/5/2020	Secured:	\$0.00	Secured:	n/a	Secured:	\$0.00	Satisfied.
C/O Therese A. Schellhammer 123 South Second PO Box 1226 Poplar Bluff, MO 63902-1226					Administrative:	\$0.00	Administrative:	n/a	Administrative:	\$0.00	
					Priority:	\$1,236.40	Priority:	n/a	Priority:	\$0.00	
					Unsecured:	\$0.00	Unsecured:	n/a	Unsecured:	\$0.00	
					Total:	\$1,236.40	Total:	n/a	Total:	\$0.00	
Luke Davidson	20-43597	Briggs & Stratton Corporation	1562	10/7/2020	Secured:	\$0.00	Secured:	n/a	Secured:	\$0.00	Satisfied.
C/O Therese A. Schellhammer 123 South Second PO Box 1226 Poplar Bluff,, MO 63902-1226					Administrative:	\$0.00	Administrative:	n/a	Administrative:	\$0.00	
					Priority:	\$1,348.80	Priority:	n/a	Priority:	\$0.00	
					Unsecured:	\$0.00	Unsecured:	n/a	Unsecured:	\$0.00	
					Total:	\$1,348.80	Total:	n/a	Total:	\$0.00	
Michelle Spencer, Administrator of the Estate	20-43597	Briggs & Stratton Corporation	1637	10/7/2020	Secured:	\$0.00	Secured:	n/a	Secured:	\$0.00	The claimant attached insufficient support to validate the claim.
Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101					Administrative:	\$0.00	Administrative:	n/a	Administrative:	\$0.00	
					Priority:	\$0.00	Priority:	n/a	Priority:	\$0.00	
					Unsecured:	\$50,000.00	Unsecured:	n/a	Unsecured:	\$0.00	
					Total:	\$50,000.00	Total:	n/a	Total:	\$0.00	
Mississippi Department of Revenue	20-43597	Briggs & Stratton Corporation	2528	12/8/2020	Secured:	\$0.00	Secured:	n/a	Secured:	\$0.00	The Debtors' books and records show no resulting liability to the claimant.
Bankruptcy Section PO Box 22808 Jackson, MS 39225-2808					Administrative:	\$0.00	Administrative:	n/a	Administrative:	\$0.00	
					Priority:	\$0.00	Priority:	n/a	Priority:	\$0.00	
					Unsecured:	\$0.00	Unsecured:	n/a	Unsecured:	\$0.00	
					Total:	\$0.00	Total:	n/a	Total:	\$0.00	
Mitchel Barks	20-43597	Briggs & Stratton Corporation	1460	10/5/2020	Secured:	\$0.00	Secured:	n/a	Secured:	\$0.00	Satisfied.
c/o Therese A. Schellhammer 123 South Second PO Box 1226 Poplar Bluff, MO 63902-1226					Administrative:	\$0.00	Administrative:	n/a	Administrative:	\$0.00	
					Priority:	\$2,405.00	Priority:	n/a	Priority:	\$0.00	
					Unsecured:	\$0.00	Unsecured:	n/a	Unsecured:	\$0.00	
					Total:	\$2,405.00	Total:	n/a	Total:	\$0.00	

Exhibit A  
Briggs & Stratton Corp., et al.

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		As Stipulated		Modified Claim Amount and		Basis for Proposed Modification
					Claim Amount and Priority		Claim Amount and Priority		Priority		
Ohio Bureau of Workers Compensation	20-43597	Briggs & Stratton Corporation	2304	11/2/2020	Secured:	\$0.00	Secured:	n/a	Secured:	\$0.00	Satisfied.
Legal Division Bankruptcy Unit PO Box 15567 Columbus, OH 43215-0567					Administrative:	\$0.00	Administrative:	n/a	Administrative:	\$0.00	
					Priority:	\$134.00	Priority:	n/a	Priority:	\$0.00	
					Unsecured:	\$0.00	Unsecured:	n/a	Unsecured:	\$0.00	
					Total:	\$134.00	Total:	n/a	Total:	\$0.00	
Patricia Kampling	20-43597	Briggs & Stratton Corporation	2378	10/30/2020	Secured:	\$0.00	Secured:	n/a	Secured:	\$0.00	Satisfied.
4827 Enchanted Valley Middleton, WI 53562					Administrative:	\$110,000.00	Administrative:	n/a	Administrative:	\$0.00	
					Priority:	\$0.00	Priority:	n/a	Priority:	\$0.00	
					Unsecured:	\$0.00	Unsecured:	n/a	Unsecured:	\$0.00	
					Total:	\$110,000.00	Total:	n/a	Total:	\$0.00	
Rhonda Bell	20-43597	Briggs & Stratton Corporation	1601	10/7/2020	Secured:	\$0.00	Secured:	n/a	Secured:	\$0.00	Satisfied.
C/O Therese A. Schellhammer 123 South Second PO Box 1226 Poplar Bluff, MO 63902-1226					Administrative:	\$0.00	Administrative:	n/a	Administrative:	\$0.00	
					Priority:	\$1,292.60	Priority:	n/a	Priority:	\$0.00	
					Unsecured:	\$0.00	Unsecured:	n/a	Unsecured:	\$0.00	
					Total:	\$1,292.60	Total:	n/a	Total:	\$0.00	
Robin Schmidt and Joann Schmidt	20-43597	Briggs & Stratton Corporation	814	9/28/2020	Secured:	\$0.00	Secured:	n/a	Secured:	\$0.00	The Debtors have no liability for this litigation-related claim. The Debtors insurance policies in effect as of the date of the causes of action are "all-sums" policies that fully cover the related liability, if any.
Jamie L. Edmonson, Esq. Robinson & Cole LLP 1201 N. Market Street, Suite 1406 Wilmington, DE 19801					Administrative:	\$0.00	Administrative:	n/a	Administrative:	\$0.00	
					Priority:	\$0.00	Priority:	n/a	Priority:	\$0.00	
					Unsecured:	\$0.00	Unsecured:	n/a	Unsecured:	\$0.00	
					Total:	\$0.00	Total:	n/a	Total:	\$0.00	
Saint-Gobain Performance Plastics Corporation	20-43597	Briggs & Stratton Corporation	519	9/8/2020	Secured:	\$0.00	Secured:	n/a	Secured:	\$0.00	Satisfied.
Mark E. Golman Phillips Murrah P.C. 3710 Rawlins Street, Suite 1420 Dallas, TX 75219					Administrative:	\$5,894.40	Administrative:	n/a	Administrative:	\$0.00	
					Priority:	\$0.00	Priority:	n/a	Priority:	\$0.00	
					Unsecured:	\$0.00	Unsecured:	n/a	Unsecured:	\$0.00	
					Total:	\$5,894.40	Total:	n/a	Total:	\$0.00	
Sopheon Corporation	20-43597	Briggs & Stratton Corporation	2552	12/29/2020	Secured:	\$0.00	Secured:	n/a	Secured:	\$0.00	This claim is a duplicate of claim 136 filed on 8/13/2020.
3001 Metro Drive Ste 460 Bloomington, MN 55425					Administrative:	\$0.00	Administrative:	n/a	Administrative:	\$0.00	
					Priority:	\$0.00	Priority:	n/a	Priority:	\$0.00	
					Unsecured:	\$50,703.00	Unsecured:	n/a	Unsecured:	\$0.00	
					Total:	\$50,703.00	Total:	n/a	Total:	\$0.00	
State of Wisconsin Department of Revenue	20-43597	Briggs & Stratton Corporation	2554	1/11/2021	Secured:	\$0.00	Secured:	n/a	Secured:	\$0.00	Satisfied.
Special Procedures Unit PO Box 8901 Madison, WI 53708-8901					Administrative:	\$0.00	Administrative:	n/a	Administrative:	\$0.00	
					Priority:	\$324,932.82	Priority:	n/a	Priority:	\$0.00	
					Unsecured:	\$452,219.28	Unsecured:	n/a	Unsecured:	\$0.00	
					Total:	\$777,152.10	Total:	n/a	Total:	\$0.00	
Toyota Industries Commercial Finance, Inc.	20-43597	Briggs & Stratton Corporation	1699	10/19/2020	Secured:	\$0.00	Secured:	n/a	Secured:	\$0.00	This claim has been admended and superseded by claim 1699 filed on 9/1/2021
Charles S. Stahl, Jr. Swanson, Martin & Bell, LLP 2525 Cabot Drive, Suite 204 Lisle, IL 60532					Administrative:	\$0.00	Administrative:	n/a	Administrative:	\$0.00	
					Priority:	\$0.00	Priority:	n/a	Priority:	\$0.00	
					Unsecured:	\$474,936.92	Unsecured:	n/a	Unsecured:	\$0.00	
					Total:	\$474,936.92	Total:	n/a	Total:	\$0.00	
Xprite Usa	20-43597	Briggs & Stratton Corporation	781	9/25/2020	Secured:	\$0.00	Secured:	n/a	Secured:	\$0.00	Satisfied.
13825 Benson Avenue Chino, CA 91710-7022					Administrative:	\$0.00	Administrative:	n/a	Administrative:	\$0.00	
					Priority:	\$0.00	Priority:	n/a	Priority:	\$0.00	
					Unsecured:	\$3,500.00	Unsecured:	n/a	Unsecured:	\$0.00	
					Total:	\$3,500.00	Total:	n/a	Total:	\$0.00	
Wisconsin Department of Revenue	20-43597	Briggs & Stratton Corporation	2597	8/13/2021	Secured:	\$0.00	Secured:	n/a	Secured:	\$0.00	Satisfied.
Special Procedures Unit PO Box 8901 Madison, WI 53708-8901					Administrative:	\$0.00	Administrative:	n/a	Administrative:	\$0.00	
					Priority:	\$241,080.17	Priority:	n/a	Priority:	\$0.00	
					Unsecured:	\$293,012.12	Unsecured:	n/a	Unsecured:	\$0.00	
					Total:	\$534,092.29	Total:	n/a	Total:	\$0.00	
Wisconsin Department of Revenue	20-43597	Briggs & Stratton Corporation	2554	8/13/2021	Secured:	\$0.00	Secured:	n/a	Secured:	\$0.00	Satisfied.
Special Procedures Unit PO Box 8901 Madison, WI 53708-8901					Administrative:	\$0.00	Administrative:	n/a	Administrative:	\$0.00	
					Priority:	\$241,080.17	Priority:	n/a	Priority:	\$0.00	
					Unsecured:	\$293,012.12	Unsecured:	n/a	Unsecured:	\$0.00	
					Total:	\$534,092.29	Total:	n/a	Total:	\$0.00	
Wisconsin Department of Revenue	20-43597	Briggs & Stratton Corporation	2554	10/6/2021	Secured:	\$0.00	Secured:	n/a	Secured:	\$0.00	Satisfied.
Special Procedures Unit PO Box 8901 Madison, WI 53708-8901					Administrative:	\$0.00	Administrative:	n/a	Administrative:	\$0.00	
					Priority:	\$258,909.30	Priority:	n/a	Priority:	\$0.00	
					Unsecured:	\$0.00	Unsecured:	n/a	Unsecured:	\$0.00	
					Total:	\$258,909.30	Total:	n/a	Total:	\$0.00	