

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
Greenbelt Division

In re:

THE CONDOMINIUM ASSOCIATION OF
THE LYNNHILL CONDOMINIUM,

Debtor.¹

Case No. 18-10334

Chapter 11

**NOTICE OF (A) DEADLINE FOR CASTING VOTES TO ACCEPT OR
REJECT THE DEBTOR'S CHAPTER 11 PLAN, (B) HEARING TO CONSIDER
APPROVAL OF THE DISCLOSURE STATEMENT AND CONFIRMATION
OF THE PLAN, AND (C) RELATED MATTERS AND PROCEDURES**

PLEASE TAKE NOTICE THAT:

1. On January 10, 2018 (the "Petition Date"), the Debtor filed: (a) Chapter 11 Plan of the Condominium Association of the Lynnhill Condominium (as it may be amended or modified, the "Plan"); (b) the disclosure statement for the Plan (as it may be amended or modified, the "Disclosure Statement"); and (c) *Debtor's Expedited Motion for (I) Conditional Approval of the Disclosure Statement, (II) Approval of Procedures for Solicitation and Tabulation of Votes on the Plan, and (III) a Combined Hearing on Approval of the Disclosure Statement and Confirmation of the Plan* [Doc. 26] (the "Motion").²
2. Pursuant to an order of the Court dated January 18, 2018 [Doc. 72] (the "Solicitation Procedures Order"), the solicitation procedures and other related materials have been approved for the solicitation of votes to accept or reject the Plan. The Solicitation Procedures Order also conditionally approved the Disclosure Statement without prejudice to any party in interest's objection to the Disclosure Statement at the Combined Hearing.
3. **A hearing to consider approval of the Disclosure Statement and confirmation of the Plan (the "Combined Hearing") will be held on February 27, 2018, at 10:00 a.m. Eastern Time before the Honorable Wendelin I. Lipp, United States Bankruptcy Judge, in Courtroom 3C at the United States Courthouse, 6500 Cherrywood Lane, Greenbelt, MD 20770.**

¹ The Debtor's federal identification number is 52-0993760.

² Capitalized terms used in this Notice not otherwise defined have the meaning given in the Plan or the Motion, as applicable.



4. **If the Plan is approved at the Combined Hearing, the Property, which includes the Lynnhill Condominium, all of its constituent units, common areas, and surrounding parking lots and land will be sold free and clear of all liens, claims and encumbrances.**
5. Pursuant to the Solicitation Procedures Order, the Court approved certain procedures for the solicitation and tabulation of votes to accept or reject the Plan.
 - a. Under the terms of the Plan, Class 2 (Secured Claims), Class 3 (General Unsecured Claims) and Class 4 (Former Resident Claims) are entitled to vote on the Plan.
 - b. If you are the holder of a claim against the Debtor as of January 10, 2018 in a Class entitled to vote on the Plan (*i.e.*, Classes 2, 3 and 4), you have received with this notice a Solicitation Package. The Solicitation Package includes, among other things, a ballot form (a “Ballot”) and voting instructions appropriate for your claim, as well as copies of the Plan and the Disclosure Statement and related solicitation materials.
 - c. **The deadline to return completed Ballots is 5:00 p.m. Eastern Time on February 16, 2018** (the “Voting Deadline”). Any failure to follow the voting instructions included with the Ballot or to return a properly completed Ballot so that it is received by the Voting Deadline may disqualify the Ballot.
 - d. **YOU ARE URGED TO READ CAREFULLY ALL INSTRUCTIONS RECEIVED WITH YOUR SOLICITATION MATERIALS TO ENSURE THAT YOUR BALLOT IS PROPERLY COMPLETED AND TIMELY SUBMITTED.**
 - e. Under the terms of the Plan, Class 1 (Priority Non-Tax Claims) are not entitled to vote on the Plan.
 - f. If you are the holder of a claim against or interest in the Debtor in a Class not entitled to vote on the Plan, you have not received a Solicitation Package. Copies of the Plan and the Disclosure Statement and other key documents in this chapter 11 case are available for inspection free of charge (i) on the website established by the Debtor for this chapter 11 case at <http://www.kccllc.net/Lynnhill>; or (ii) between the hours of 8:00 a.m. and 4:00 p.m. (ET), Monday through Friday, at the Office of the Clerk, 6500 Cherrywood Lane, Suite 300, Greenbelt, MD 20770; or (iii) by contacting the Solicitation Agent using the information below.
 - g. Any holder of a claim that (a) is not listed in the Debtor’s schedules and (b) is not the subject of a proof of claim filed by the Voting Record Date will not be treated as a creditor with respect to such claim for purposes of voting on or objecting to the Plan.

6. Objections, if any, to approval of the Disclosure Statement or confirmation of the Plan must: (a) be in writing; (b) state the name and address of the objecting party and the nature of the claim of such party; (c) state with particularity the basis and nature of such Objection (and, if practicable, a proposed modification to the Plan that would resolve such Objection); (d) conform to the Bankruptcy Rules, the Local Rules and any orders of the Court; and (e) be filed with the Court and served on the following parties so that they are received no later than **5:00 p.m. Eastern Time on February 20, 2018**:
 - a. counsel to the Debtor, Pillsbury Winthrop Shaw Pittman LLP, 1200 Seventeenth Street, NW, Washington, DC 20036, Attn: Patrick J. Potter; and
 - b. the Office of the United States Trustee for Region 4, 6305 Ivy Lane, Suite 600, Greenbelt, MD 20770, Attn: Jeanne M. Crouse.
7. The Combined Hearing may be continued from time to time without further notice other than an order confirming the adjourned date at the Combined Hearing or any continued hearing.
8. Copies of the Plan, the Disclosure Statement, and other information regarding the Debtor's chapter 11 case are available free of charge at <http://www.kccllc.net/Lynnhill>, upon written request to LynnhillInfo@kccllc.com or Lynnhill Ballot Processing Center, c/o KCC, 2335 Alaska Ave., El Segundo, CA 90245 or by calling: 877-725-7530 or 424-236-7240.

Dated: January 18, 2018

Pillsbury Winthrop Shaw Pittman LLP

/s/ Patrick J. Potter

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Proposed Counsel for the Debtor