

**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 DEADLINES FOR FILING UNIT LIENHOLDER CLAIMS AND FOR
FORMER UNIT OWNERS TO OBJECT TO SUCH CLAIMS**

PLEASE TAKE NOTICE THAT:

1. On January 10, 2018, the Condominium Association of the Lynnhill Condominium (the “**Debtor**”) filed a voluntary petition for relief under chapter 11 of the U.S. Bankruptcy Code in the U.S. Bankruptcy Court for the District of Maryland (the “**Court**”).
2. On March 1, 2018, the Court entered an order confirming the Debtor’s *Second Amended Joint Chapter 11 Plan* [Doc. 227] (the “**Plan**”) and approving the sale of the real property located at 3103 and 3107 Good Hope Avenue, Temple Hills, Maryland 20748 (the “**Property**”) to Dragone Realty, LLC.
3. On July 13, 2018, the Court entered an order [Doc. 282] (the “**Unit Lienholder Bar Date Order**”) establishing: (i) **August 10, 2018 at 5:00 p.m. (ET)** as the deadline (the “**Unit Lienholder Bar Date**”) by which any person or entity asserting a claim that was secured by a Residential Unit of the Property immediately prior to the sale of the Property must file and serve a proof of claim (any such filed claims, “**Unit Lienholder Claims**”), (ii) **September 12, 2018 at 5:00 p.m. (ET)** as the deadline for former unit owners and other parties in interest to object to Unit Lienholder Claims, and (iii) **October 3, 2018 at 11:00 a.m. (ET)** as the hearing date for any disputed and unresolved objections to Unit Lienholder Claims.
4. **Unless you fall into one of the categories listed in paragraph 5 of this Notice, you MUST file and serve a claim. Any person or entity that previously filed a proof of claim on account of a claim that was secured by a Residential Unit of the Property must file and serve an amended claim to include the information identified in paragraph 8 of this Notice.**
5. The following entities, whose claims otherwise would be subject to the Unit Lienholder Bar Date, **DO NOT** need to file a Unit Lienholder Claim by the Unit Lienholder Bar Date: (i) the Debtor on account of any unpaid condominium fees and assessments; and (ii) any person or entity whose claim previously has been allowed by, or paid pursuant to, an order of the Court (collectively, the “**Excluded Claims**”).

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



6. **THE MERE FACT THAT YOU HAVE RECEIVED THIS NOTICE DOES NOT MEAN THAT YOU HAVE A UNIT LIENHOLDER CLAIM OR THAT THE DEBTOR BELIEVES YOU HAVE A UNIT LIENHOLDER CLAIM. IF YOU HAVE ANY DOUBTS, YOU SHOULD TIMELY FILE AND SERVE A CLAIM.**

INSTRUCTIONS FOR FILING A UNIT LIENHOLDER CLAIM:

7. Any person or entity asserting a Unit Lienholder Claim must file and serve a proof of claim substantially in the form of Official Bankruptcy Form B410, together with an addendum identifying (together with (i)–(iv) below, a “**Claim Form**”):
- i. the obligor (*i.e.*, the party against whom the claim is held);
 - ii. the applicable Residential Unit number;
 - iii. the date the obligation arose; and
 - iv. evidence of the claim, including copies of the document(s) granting the security interest (*e.g.*, deed of trust, judgment, invoice (for mechanics liens) or other security instrument) and of the document(s) evidencing perfection and recordation of the security interest.
8. Unit Lienholder Claims must be filed and served so as to be RECEIVED prior to **5:00 p.m. (ET) on August 10, 2018**. You can file your Claim Form by (i) electronic submission on the Court’s website at <http://www.mdb.uscourts.gov/content/electronic-filing-claims> or (ii) mailing or delivering the Claim Form to the Office of the Clerk, 6500 Cherrywood Lane, Greenbelt, MD 20770. The Court will not accept Claim Forms by facsimile, telecopy, or e-mail.
9. Additionally, any party filing a Claim Form must serve, by certified mail, a copy of the Claim Form on the applicable Former Resident and any other party that had an interest in the applicable Residential Unit immediately prior to the sale of the Property.²

CONSEQUENCES OF MISSING THE UNIT LIENHOLDER BAR DATE OR FAILING TO INCLUDE THE INFORMATION REQUIRED BY THE CLAIM FORM:

10. **EXCEPT WITH RESPECT TO THE EXCLUDED CLAIMS (AS DESCRIBED IN PARAGRAPH 6 OF THIS NOTICE), ANY PERSON OR ENTITY REQUIRED TO FILE AND SERVE A CLAIM USING THE CLAIM FORM, BUT THAT FAILS TO DO SO BY THE UNIT LIENHOLDER BAR DATE OR FAILS TO INCLUDE THE INFORMATION REQUIRED BY THE CLAIM FORM, INCLUDING THE INFORMATION IDENTIFIED IN PARAGRAPH 8 OF THIS NOTICE:**

- **WILL BE FOREVER BARRED, ESTOPPED, AND ENJOINED FROM ASSERTING ANY CLAIM THAT THE PERSON OR ENTITY HAS AGAINST**

² Service shall be at the last known address as set forth on (a) a proof of claim or Claim Form filed with the Court in this case, (b) any subsequent notice of change of address filed with the Court in this case, or (c) any written instructions of the Former Resident or other party that had an interest in the Residential Unit.

THE FRACTIONAL SALE PROCEEDS, THE APPLICABLE FORMER RESIDENT(S), OR THE DEBTOR;

- **WILL BE BARRED FROM PARTICIPATING IN ANY DISTRIBUTION UNDER THE PLAN WITH RESPECT TO SUCH CLAIM; AND**
- **WILL HAVE ALL OF THEIR LIENS, CLAIMS, ENCUMBRANCES, AND INTERESTS ON ACCOUNT OF SUCH CLAIM DISCHARGED.**

OBJECTIONS TO UNIT LIENHOLDER CLAIMS:

11. If you wish to object to any Unit Lienholder Claim, then you or your attorney must file a written objection on or before **September 12, 2018 at 5:00 p.m. (ET)** with the Clerk of the Court, 6500 Cherrywood Lane, Greenbelt, MD 20770. You may append affidavits and documents in support of your objection.
12. If there are any disputed and unresolved objections to Unit Lienholder Claims, then the Court will hold a hearing on such objections on **October 3, 2018 at 11:00 a.m. (ET)** at the U.S. Bankruptcy Court, 6500 Cherrywood Lane, Greenbelt, MD 20770.

EXAMINATION OF THE DEBTOR'S COURT FILINGS:

13. Copies of the Unit Lienholder Bar Date Order and other information regarding the Debtor's chapter 11 case are available for inspection free of charge (i) on the website established by the Debtor 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. Copies are also available upon written request to LynnhillInfo@kccllc.com or Lynn Hill Claims Processing Center, c/o KCC, 2335 Alaska Avenue, El Segundo, CA 90245 or by calling: 877-725-7530 or 424-236-7240.
14. Please note that the Debtor's counsel cannot advise you on how to file—or whether you should file—a Unit Lienholder Claim.

Dated: July 17, 2018

Pillsbury Winthrop Shaw Pittman LLP

/s/ Patrick J. Potter

Patrick J. Potter (Bar No. 08445)

Dania Slim (Bar No. 18050)

1200 Seventeenth Street, NW

Washington, DC 20036

Tel (202) 663-8928

Fax (202) 663-8007

E-mail: patrick.potter@pillsburylaw.com

E-mail: daniaslim@pillsburylaw.com

Counsel for the Debtor