

Hearing Date: November 19, 2020 at 11:00 a.m. (Prevailing Eastern Time)
Objection Deadline: November 12, 2020 at 4:00 p.m. (Prevailing Eastern Time)

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Counsel for Plan Administration Trustee

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----	X	
<i>In re</i>	:	Chapter 11
	:	
JCK LEGACY COMPANY, <i>et al.</i>,	:	Case No. 20-10418 (MEW)
	:	
Wind-Down Debtors.¹	:	(Jointly Administered)
	:	
-----	X	

**NOTICE OF HEARING TO CONSIDER PLAN ADMINISTRATION
TRUSTEE'S FOURTEENTH OMNIBUS OBJECTION TO CLAIMS
(NO LIABILITY CLAIMS – PENSION CLAIMS)**

¹ The Wind-Down Debtors in these chapter 11 cases and the last four characters of each Wind-Down Debtor's tax identification number are: JCK Legacy Company (0478) and Herald Custom Publishing of Mexico, S. de R.L. de C.V. (SUZ1). The location of the Plan Administration Trustee's service address for purposes of these chapter 11 cases is: 1201 W Peachtree Street, NW, Suite 500, Atlanta, Georgia 30309.

THIS OBJECTION SEEKS TO EXPUNGE CERTAIN CLAIMS. CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON EXHIBIT 1 TO THE DECLARATION OF SEAN M. HARDING ANNEXED HERETO.

PLEASE TAKE NOTICE that on October 19, 2020, Sean M. Harding, a Senior Managing Director with FTI Consulting, Inc. and the Plan Administration Trustee (the “**Plan Administration Trustee**”) for JCK Legacy Company and certain of its affiliates (collectively, the “**Debtors**”) filed the *Plan Administration Trustee’s Fourteenth Omnibus Objection to Claims (No Liability Claims – Pension Claims)* (the “**Objection**”).

PLEASE TAKE FURTHER NOTICE that a hearing on the Objection to consider the entry of an order disallowing and expunging certain claims for which the Debtors have no liability to the claimants asserting such claims will be held before the Honorable Michael E. Wiles, United States Bankruptcy Judge in the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Courtroom 617, New York, New York 10004 (the “**Bankruptcy Court**”), on **November 19, 2020 at 11:00 a.m. (prevailing Eastern Time)** (the “**Hearing**”), or as soon thereafter as counsel may be heard, unless the telephonic hearing procedures set forth in General Order M-543 (Morris, C.J.) (as may be amended) remain in effect as of that date, in which case the Hearing shall be held telephonically via Court Solutions LLC. Instructions to register for Court Solutions LLC are attached to Gen. Ord. M-543.

PLEASE TAKE FURTHER NOTICE that Gen. Ord. M-543, along with other temporary procedures implemented by the Bankruptcy Court in connection with the COVID-19 pandemic (including electronic filing procedures for *pro se* parties) can be found by visiting www.nysb.uscourts.gov and clicking on the “Coronavirus COVID-19 Protocol” banner.

PLEASE TAKE FURTHER NOTICE that responses or objections

(the “**Responses**”), if any, to the Objection, must be made in writing and (a) filed with the Bankruptcy Court no later than 4:00 p.m. (prevailing Eastern Time) on November 12, 2020 (the “**Response Deadline**”) and (b) served so as to be actually received by the following parties by the Response Deadline:

(i) the Debtors, JCK Legacy Company, c/o FTI Consulting, Inc., 1201 W Peachtree Street, NW, Suite 500, Atlanta, Georgia 30309, Attn.: Sean M. Harding (sean.harding@fticonsulting.com);

(ii) counsel for the Plan Administration Trustee, Skadden, Arps, Slate, Meagher & Flom LLP, One Manhattan West, New York, New York 10001, Attn.: Shana A. Elberg (shana.elberg@skadden.com) and Bram A. Stochlic (bram.stochlic@skadden.com), 300 South Grand Avenue, Suite 3400, Los Angeles, California 90071, Attn.: Van C. Durrer, II (van.durrer@skadden.com), and Destiny N. Almogue (destiny.almogue@skadden.com) and 525 University Avenue, Palo Alto, California 94301 Attn.: Jennifer Madden (jennifer.madden@skadden.com);

(iii) co-counsel for the Plan Administration Trustee, Togut, Segal & Segal LLP, One Penn Plaza, Suite 3335, New York, New York 10119, Attn.: Albert Togut (altogut@teamtogut.com) and Kyle J. Ortiz (kortiz@teamtogut.com);

(iv) the Office of the United States Trustee, U.S. Federal Office Building, 201 Varick Street, Room 1006, New York, New York 10014, Attn.: Benjamin J. Higgins and Brian S. Masumoto;

(v) counsel to the Official Committee of Unsecured Creditors, Stroock & Stroock & Lavan LLP, 180 Maiden Lane, New York, New York 10038-4982, Attn.: Kristopher M. Hansen (khansen@stroock.com), Frank A. Merola (fmerola@stroock.com), Erez E. Gilad (egilad@stroock.com), Samantha L. Martin (smartin@stroock.com), and Gabriel E. Sasson (gsasson@stroock.com);

(vi) counsel to Chatham Asset Management, Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, New York 10019, Attn.: Andrew N. Rosenberg (arosenberg@paulweiss.com) and Elizabeth R. McColm (emccolm@paulweiss.com) and John T. Weber (jweber@paulweiss.com);

(vii) counsel to Brigade Capital Management, LP, Kramer Levin Naftalis & Frankel LLP, 1177 Avenue of the Americas, New York, New York 10036, Attn.: Thomas Moers Mayer (tmayer@kramerlevin.com), Douglas H. Mannal (dmannal@kramerlevin.com) and David Braun (dbraun@kramerlevin.com);

(viii) counsel to the Pension Benefit Guaranty Corp., Schafer and Weiner, PLLC, 40950 Woodward Avenue, Suite 100, Bloomfield Hills, Michigan 48304, Attn.: Joseph K. Grekin (jgrekin@schaferandweiner.com); and

(ix) any party that has requested notice pursuant to Bankruptcy Rule 2002.

PLEASE TAKE FURTHER NOTICE that a copy of the Objection can be obtained through the Bankruptcy Court's electronic case filing system at www.nysb.uscourts.gov using a PACER password (to obtain a PACER password, go to the PACER website, www.pacer.gov) or the website maintained by the Debtors' noticing agent, Kurtzman Carson Consultants LLC, at www.kccllc.net/McClatchy.

PLEASE TAKE FURTHER NOTICE that if no timely, written responses are filed and received in accordance with the foregoing, an order granting the relief sought in the Objection may be entered by the Court.

[Concluded on Following Page]

Dated: New York, New York
October 19, 2020

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/s/ Kyle J. Ortiz

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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<i>In re</i>	:	Chapter 11
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JCK LEGACY COMPANY, <i>et al.</i>,	:	Case No. 20-10418 (MEW)
	:	
Wind-Down Debtors.¹	:	(Jointly Administered)
	:	
-----	X	

**PLAN ADMINISTRATION TRUSTEE'S
FOURTEENTH OMNIBUS OBJECTION TO CLAIMS
(NO LIABILITY CLAIMS – PENSION CLAIMS)**

¹ The Wind-Down Debtors in these chapter 11 cases and the last four characters of each Wind-Down Debtor's tax identification number are: JCK Legacy Company (0478) and Herald Custom Publishing of Mexico, S. de R.L. de C.V. (5UZ1). The location of the Plan Administration Trustee's service address for purposes of these chapter 11 cases is: 1201 W Peachtree Street, NW, Suite 500, Atlanta, Georgia 30309.



THIS OBJECTION SEEKS TO EXPUNGE CERTAIN CLAIMS. CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON EXHIBIT 1 TO THE DECLARATION OF SEAN M. HARDING ANNEXED HERETO.

TO THE HONORABLE MICHAEL E. WILES,
UNITED STATES BANKRUPTCY JUDGE:

Sean M. Harding, a Senior Managing Director with FTI Consulting, Inc. and the Plan Administration Trustee (the “**Plan Administration Trustee**”) for JCK Legacy Company and certain of its affiliates (collectively, the “**Debtors**” or the “**Company**”), hereby submits this omnibus claims objection (the “**Objection**”), pursuant to sections 105(a) and 502 of title 11 of the United States Code (the “**Bankruptcy Code**”) and Rule 3007 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), for an order, substantially in the form annexed hereto as **Exhibit A** (the “**Proposed Order**”), disallowing and expunging certain claims (the “**No Liability Claims**”) listed on **Exhibit 1** to the Declaration of Sean M. Harding (the “**Declaration**”), for which the Debtors have no liability to the claimants asserting the No Liability Claims. In support of this Objection, the Plan Administration Trustee relies on the Declaration, annexed hereto as **Exhibit B**, and respectfully represents:

JURISDICTION

1. This Court has jurisdiction to consider this Objection pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief requested herein are sections 105(a) and 502 of the Bankruptcy Code and Bankruptcy Rule 3007.

BACKGROUND

3. On February 13, 2020 (the “**Petition Date**”),² each Debtor commenced a case by filing a petition for relief under chapter 11 of the Bankruptcy Code (collectively, the “**Chapter 11 Cases**”). The Chapter 11 Cases are jointly administered.

4. On February 26, 2020, the Office of the United States Trustee for the Southern District of New York appointed a creditors’ committee in these Chapter 11 Cases [Docket No. 114].

5. Prior to the Petition Date, the Debtors were a diversified digital and print media business, focused on providing strong, independent local journalism to thirty communities in fourteen states, as well as national news coverage through the Debtors’ Washington D.C.-based bureau. The Debtors also provided a full suite of both local and nationwide digital marketing services. The Debtors’ businesses were comprised of websites and mobile applications, mobile news and advertising, video products, a digital marketing agency, daily newspapers, niche publications, other print and digital direct marketing services, and community newspapers. The Company’s business operations, corporate and capital structures, and restructuring efforts are described in greater detail in the *Declaration of Sean M. Harding in Support of Chapter 11 Petitions and First Day Papers* [Docket No. 23].

6. On April 28, 2020, the Debtors filed their schedules of assets and liabilities and statement of financial affairs (collectively, the “**Schedules and Statements**”). On

² On March 24, 2020 (the “**Additional Petition Date**”), Debtor Oak Street Redevelopment Corporation (“**Oak Street**”) also commenced a case by filing a chapter 11 petition. As used herein, the term “Petition Date” encompasses the Additional Petition Date, and the term “Chapter 11 Cases” includes the Oak Street chapter 11 case, which is being jointly administered with the Debtors’ chapter 11 cases commenced on February 13, 2020. See *Order (I) Directing Joint Administration of Cases and (II) Waiving Requirements of Bankruptcy Code Section 342(c)(1) and Bankruptcy Rules 1005 and 2002(n)* [Docket No. 265].

June 16, 2020, the Debtors filed amendments to the Schedules and Statements.

7. Pursuant to the *Order Establishing Bar Dates for Filing Proofs of Claim and Approving Form and Manner of Notice Thereof*, dated May 21, 2020 [Docket No. 485] (the “**Bar Date Order**”) and Bankruptcy Rule 3003(c)(3), the Court established July 10, 2020 at 5:00 p.m. (Eastern Time) as the deadline to file proofs of claim against the Debtors’ estates on account of claims that arose or were deemed to have arisen prior to the Petition Date (the “**General Bar Date**”). Pursuant to the Bar Date Order and section 502(b)(9) of the Bankruptcy Code, the Court established August 11, 2020 at 5:00 p.m. (Eastern Time) as the deadline for all governmental units to file proofs of claim against the Debtors’ estates on account of claims that arose or were deemed to have arisen prior to the Petition Date (the “**Governmental Bar Date**,” and together with the General Bar Date, the “**Bar Dates**”). Additionally, the Bar Date Order approved the form of proof of claim to be filed against the Debtors and the manner of giving notice of the Bar Dates.

8. Pursuant to the Bar Date Order, publication notice of the Bar Dates appeared in the *New York Times* on May 29, 2020. *See* Docket No. 513.

9. On September 21, 2020, the Debtors filed the *First Amended Joint Chapter 11 Plan of Distribution of JCK Legacy Company and its Affiliated Debtors and Debtors in Possession* [Docket No. 867, Exhibit A] (as may be amended, modified, and/or supplemented from time to time, the “**Chapter 11 Plan**”).³

10. On September 25, 2020, the Court entered the *Findings of Fact, Conclusions of Law, and Order Approving the Disclosure Statement and Confirming the First Amended Joint Chapter 11 Plan of Distribution of JCK Legacy Company and its Affiliated*

³ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Chapter 11 Plan.

Debtors and Debtors in Possession [Docket No. 879]. The Effective Date of the Chapter 11 Plan occurred on September 30, 2020 [Docket No. 886].

11. The Chapter 11 Plan established the deadline for filing proofs of or requests for payment of Administrative Claims as thirty (30) days after the Effective Date of the Chapter 11 Plan, unless otherwise ordered by the Court.

12. Pursuant to Article 6.6 of the Chapter 11 Plan, the Plan Administration Trustee was appointed as of the Effective Date. As set forth in the Chapter 11 Plan:

Except as otherwise specifically provided for in the Plan, after the Effective Date, the Plan Administration Trustee shall retain responsibility for (a) administering, disputing, objecting to, compromising, or otherwise resolving all Claims against, and Interests in, the Debtors, including (i) filing, withdrawing, or litigating to judgment objections to Claims or Interests, (ii) settling or compromising any Disputed Claim without any further notice to or action, order, or approval by the Bankruptcy Court, and (iii) administering and adjusting the claims register to reflect any such settlements or compromises without any further notice to or action, order, or approval by the Bankruptcy Court, and (b) making distributions (if any) with respect to all Claims and Interests; *provided, however*, that upon the creation of the GUC Recovery Trust, the GUC Recovery Trustee, on behalf of the GUC Recovery Trust, shall have the authority, but not the obligation, to object to, compromise, settle, otherwise resolve, or withdraw any objections to all General Unsecured Claims.

Chapter 11 Plan at Art. 8.2.

13. On October 13, 2020 the Court entered the *Order Authorizing the Debtors to File Omnibus Claims Objections on Grounds Other Than as Set Forth in Bankruptcy Rule 3007(d)* [Docket No. 908] (the “**Omnibus Procedures Order**”).

14. Among other things, the Omnibus Procedures Order authorizes the Plan Administration Trustee to file omnibus objections to claims on the grounds that the claims seek recovery for which the Debtors are not liable. *See* Docket No. 908 at ¶ 2(c).

RELIEF REQUESTED

15. Pursuant to sections 105(a) and 502 of the Bankruptcy Code and Bankruptcy Rule 3007, the Plan Administration Trustee seeks entry of an order, substantially in the form of the Proposed Order, disallowing and expunging the No Liability Claims.

BASIS FOR RELIEF

16. Section 502 of the Bankruptcy Code provides, in pertinent part:

(a) A claim or interest, proof of which is filed under section 501 of this title, is deemed allowed, unless a party in interest, including a creditor of a general partner in a partnership that is a debtor in a case under chapter 7 of this title, objects.

11 U.S.C. § 502(a).

17. Bankruptcy Rule 3001(f) provides that “[a] proof of claim executed and filed in accordance with [the Bankruptcy Rules] shall constitute prima facie evidence of the validity and amount of the claim.” Fed. R. Bankr. P. 3001(f).

18. The Omnibus Procedures Order provides that the Debtors, the Plan Administration Trustee, and the GUC Recovery Trustee are authorized to file omnibus objections seeking reduction, reclassification, and/or disallowance of secured claims, administrative expense claims, priority claims, unsecured claims, interests, claims pursuant to section 510(b) of the Bankruptcy Code, and all other “claims” as that term is defined in section 101(5) of the Bankruptcy Code (collectively, “**Claims**”), on the grounds that the Claims seek recovery of amounts for which the Debtors are not liable.

19. As set forth in Bankruptcy Rule 3001(f), a properly executed and filed proof of claim constitutes *prima facie* evidence of the validity and the amount of the claim under section 502(a) of the Bankruptcy Code. See *In re Vanegas*, 290 B.R. 190, 193 (Bankr. D. Conn. 2003) (citing Bankruptcy Rule 3001(f) and holding that the evidence submitted by the debtor was insufficient to overcome the validity and amount of bank's proof of claim); *In re Rockefeller Ctr. Props.*, 272 B.R. 524, 539 n.13, 553 (Bankr. S.D.N.Y. 2000) (citing Bankruptcy Rule 3001(f) in analysis of debtors' objection to former tenant's proof of claim and granting partial summary judgment with respect to the objection where there were no material facts in dispute).

20. To receive the benefit of *prima facie* validity, however, "the proof of claim must set forth the facts necessary to support the claim." *In re Marino*, 90 B.R. 25, 28 (Bankr. D. Conn. 1988) (holding that claimant's proof of claim was not entitled to the presumption of *prima facie* validity because it did not set forth the necessary facts); see also Fed. R. Bankr. P. 3001(c)(1) (requiring claimant to provide documentation where claim is based on a writing).

21. A party objecting to the proof of claim must only provide evidence sufficient to negate the *prima facie* validity of the claim by refuting one or more of the facts in the filed claim. See *In re Waterman Steamship Corp.*, 200 B.R. 770, 774–75, 777 (Bankr. S.D.N.Y. 1996) (reopening discovery into asbestos claims due to insufficient information upon which to determine validity of claims). Once this occurs, "the burden reverts to the claimant to prove the validity of the claim by a preponderance of the evidence." *In re WorldCom, Inc.*, No. 02-13533 (AJG), 2005 WL 3832065, at *4, *9 (Bankr. S.D.N.Y. 2005) (citing Bankruptcy Rule 3001(f) and holding that claimant did not meet its burden to prove validity of anticipatory

breach and unjust enrichment claims, but that further evidence was needed to assess the merits of lack of good faith claim) (quoting *In re Allegheny Int'l, Inc.*, 954 F.2d 167, 173–74 (3d Cir. 1992)); *see also In re St. Johnsbury Trucking Co.*, 206 B.R. 318, 323, 328 (Bankr. S.D.N.Y. 1997) (citing Bankruptcy Rule 3001(f) and allowing claim where debtor failed to refute any of the material facts in proof of claim).

22. The claimant must prove the claim, not sit back while the objector attempts to disprove it. *See In re Bennett*, 83 B.R. 248, 252 (Bankr. S.D.N.Y. 1988) (holding that debtor presented sufficient evidence to rebut the *prima facie* validity of claimant's claim and that claimant failed to prove claim by a preponderance of credible evidence).

OBJECTION TO NO LIABILITY CLAIMS

23. The Plan Administration Trustee submits that the No Liability Claims should be disallowed and expunged because the Debtors are not liable to such claimants for the obligations asserted in the No Liability Claims.

24. Specifically, each of the No Liability Claims were filed by, or on behalf of, certain employees or former employees of the Debtors, and each asserts a claim on account of pension benefits related to The McClatchy Company Retirement Plan, a company-sponsored noncontributory defined benefit pension plan (the “**Pension Plan**”) covered by the Pension Benefit Guaranty Corporation (the “**PBGC**”).

25. On August 7, 2020, the Court entered an order approving, among other things, the sale of substantially all of the Debtors' assets free and clear of claims, liens, interests, and encumbrances (the “**Sale Transaction**”) to SIJ Holdings, LLC (“**Purchaser**”) pursuant to that Asset Purchase Agreement, dated as of July 24, 2020 (the “**Acquisition Agreement**”). Pursuant to the terms of the Acquisition Agreement, upon consummation of the Sale

Transaction, the Purchaser was not responsible for claims, liens, liabilities, obligations, interests, and encumbrances related to the Pension Plan. This left no entity to support the Pension Plan.

26. Thus, as of August 31, 2020, the PBGC involuntarily terminated the Pension Plan, became trustee of the Pension Plan, and, subject to certain statutory limitations, pays the Pension Plan's unfunded benefits with its insurance funds. *See* 29 U.S.C. §§ 1321-1322, 1342, 1361. Moreover, pursuant to the Employee Retirement Security Act of 1974 ("ERISA"), the PBGC has the exclusive authority to properly assert a claim on account of benefits under a single-employer pension plan. The PBGC is the sole party entitled to recover from a bankrupt plan sponsor following termination of a pension plan and must allocate funds according to the provisions of 29 U.S.C. § 1322(c) and the priorities of 29 U.S.C. § 1344.

27. Accordingly, the Plan Administration Trustee respectfully requests that this Court disallow and expunge the No Liability Claims because each No Liability Claim asserts a protective claim against one or more of the Debtors for Pension Plan obligations by a party other than the PBGC, and only the PBGC has the authority to assert a valid claim on account of any obligations owing under the Pension Plan. Consequently, the Debtors have no liability to the claimants asserting the No Liability Claims.

RESERVATION OF RIGHTS

28. The Plan Administration Trustee reserves the right to amend, modify, or supplement this Objection as to any of the No Liability Claims on any basis.

29. Additionally, the Plan Administration Trustee reserves the right to further object in the future on any ground to any of the No Liability Claims that are not disallowed and expunged pursuant to the Proposed Order. A separate notice and hearing will be scheduled for any

such objection. This Objection does not constitute, and cannot form the basis of, any admission by the Plan Administration Trustee with respect to the validity or amount of any of the No Liability Claims.

30. Nothing herein shall constitute a waiver of any rights that the Plan Administration Trustee may have to (a) bring avoidance actions under the applicable sections of the Bankruptcy Code against holders of the claims subject to the Objection or (b) exercise his right of setoff against the holders of such claims related to such avoidance actions.

SEPARATE CONTESTED MATTER

31. To the extent that a response is filed regarding any No Liability Claim and the Plan Administration Trustee is unable to resolve any such response, each such No Liability Claim, and the Objection as it pertains to such No Liability Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, to the extent applicable. Further, the Plan Administration Trustee requests that any order entered by the Court granting the relief in this Objection be deemed a separate order with respect to each No Liability Claim.

NOTICE

32. Pursuant to Article 8.3 of the Plan, notice of this Objection has been given to: (a) parties on the master service list who have agreed to accept service by email; and (b) each of the parties listed on **Exhibit 1** to the Declaration. The Plan Administration Trustee submits that, in view of the facts and circumstances, such notice is sufficient and no other or further notice need be provided.

NO PREVIOUS REQUEST

33. No previous request for the relief sought herein has been made by the Plan Administration Trustee to this or any other court.

CONCLUSION

WHEREFORE the Plan Administration Trustee respectfully requests that the Court enter an order, disallowing and expunging the No Liability Claims and granting such other and further relief as the Court deems just and proper.

Dated: New York, New York
October 19, 2020

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Counsel for Plan Administration Trustee

EXHIBIT A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----	X	
<i>In re</i>	:	Chapter 11
	:	
JCK LEGACY COMPANY, <i>et al.</i>,	:	Case No. 20-10418 (MEW)
	:	
Wind-Down Debtors.¹	:	(Jointly Administered)
	:	
-----	X	

**ORDER GRANTING PLAN ADMINISTRATION
TRUSTEE'S FOURTEENTH OMNIBUS OBJECTION TO CLAIMS
(NO LIABILITY CLAIMS – PENSION CLAIMS)**

Upon the omnibus claims objection (the “**Objection**”),² of the Plan Administration Trustee, seeking entry of an order (this “**Order**”), pursuant to sections 105 and 502 of the Bankruptcy Code and Bankruptcy Rule 3007, disallowing and expunging the No Liability Claims, as more fully set forth in the Objection; and the Court having considered the Declaration of Sean M. Harding (the “**Declaration**”) in support thereof; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the Southern District of New York*, dated January 31, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and due and sufficient notice of the Objection having been given under the particular circumstances; and it

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² Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Objection.

appearing that no other or further notice is necessary; and it appearing that the relief requested in the Objection is in the best interests of the Debtors, their estates, their creditors, and other parties in interest; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and upon the hearing conducted before this Court to consider the Objection (the “**Hearing**”) and upon the record of the Hearing; and after due deliberation thereon; and good and sufficient cause appearing therefor; it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

1. The relief requested in the Objection is GRANTED as set forth herein.
2. The No Liability Claims listed on **Exhibit 1** to the Declaration, annexed to the Objection, are hereby disallowed and expunged in their entirety.
3. Each claim and the objections by the Plan Administration Trustee to each claim as identified and set forth on **Exhibit 1** to the Declaration constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each claim. Any stay of this Order shall apply only to the contested matter that involves such creditor and its claim and shall not act to stay the applicability or finality of this Order with respect to the other contested matters and corresponding claims.
4. The Plan Administration Trustee shall have the right to further object in the future on any ground to any of the No Liability Claims that are not disallowed and expunged pursuant to this Order. Neither the Objection nor this Order shall constitute any admission or finding with respect to the validity or amount of the No Liability Claims that are not disallowed and expunged pursuant to this Order.

5. The claims agent retained in the Debtors' Chapter 11 Cases is authorized to reflect the disallowance and expungement of the No Liability Claims on the official claims register maintained for the Debtors' cases.

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

7. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation or interpretation of this Order.

Dated: New York, New York
[Month] __, 2020

Honorable Michael E. Wiles
UNITED STATES BANKRUPTCY JUDGE

EXHIBIT B

Harding Declaration

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----	X	
<i>In re</i>	:	Chapter 11
	:	
JCK LEGACY COMPANY, <i>et al.</i>,	:	Case No. 20-10418 (MEW)
	:	
Wind-Down Debtors.¹	:	(Jointly Administered)
	:	
-----	X	

**DECLARATION OF SEAN M. HARDING
IN SUPPORT OF THE PLAN ADMINISTRATION
TRUSTEE'S FOURTEENTH OMNIBUS OBJECTION TO CLAIMS
(NO LIABILITY CLAIMS – PENSION CLAIMS)**

Pursuant to 28 U.S.C. § 1746, I, Sean M. Harding, hereby declare under penalty of perjury that the following is true and correct to the best of my knowledge, information, and belief:

1. Pursuant to Article 6.6 of the *First Amended Joint Chapter 11 Plan of Distribution of JCK Legacy Company and its Affiliated Debtors and Debtors in Possession* [Docket No. 867, Exhibit A] (as may be amended, modified, and/or supplemented from time to time, the “**Chapter 11 Plan**”), as of the Effective Date (as defined in the Chapter 11 Plan), which occurred on September 30, 2020, I was appointed as the Plan Administration Trustee for JCK Legacy Company and certain of its affiliates (collectively, the “**Debtors**”).

2. I am in all respects competent to make this Declaration, which I submit in support of the *Plan Administration Trustee's Fourteenth Omnibus Objection to Claims (No Liability Claims – Pension Claims)* (the “**Objection**”),² seeking entry of an order disallowing

¹ The Wind-Down Debtors in these chapter 11 cases and the last four characters of each Wind-Down Debtor's tax identification number are: JCK Legacy Company (0478) and Herald Custom Publishing of Mexico, S. de R.L. de C.V. (SUZ1). The location of the Plan Administration Trustee's service address for purposes of these chapter 11 cases is: 1201 W Peachtree Street, NW, Suite 500, Atlanta, Georgia 30309.

² Capitalized terms used and not otherwise defined herein shall have the meaning ascribed to them in the Objection.

and expunging certain claims (the “**No Liability Claims**”), listed on **Exhibit 1** annexed hereto.

3. Except as otherwise set forth herein, all statements in this Declaration are based on my personal knowledge, my familiarity with the Debtors’ books and records (the “**Books and Records**”), the Debtors’ Schedules and Statements, my review and reconciliation of the filed proofs of claim, my discussions with the legal and financial professionals familiar with the Debtors’ Chapter 11 Cases, or my review of relevant documents. If I were called upon to testify, I could and would testify competently to the facts set forth in the Objection.

4. I have personally reviewed, have caused a member of the Debtors’ staff under my supervision to review, or have caused professionals under my supervision familiar with these Chapter 11 Cases to review the No Liability Claims and compare the information submitted in support thereof, if any, with the Books and Records, the Schedules and Statements, the official claims register maintained in these Chapter 11 Cases, and/or the facts and circumstances set forth in the Objection regarding the No Liability Claims.

5. Based upon this review, I have determined that the No Liability Claims should be disallowed and expunged because each No Liability Claim asserts a protective claim against one or more of the Debtors for Pension Plan obligations by a party other than the PBGC, and only the PBGC has the authority to assert a valid claim on account of any obligations owing under the Pension Plan. Consequently, the Debtors have no liability to the claimants asserting the No Liability Claims.

Executed on this 19th day of October, 2020.

/s/ Sean M. Harding
Sean M. Harding
Plan Administration Trustee

EXHIBIT 1

No Liability Claims – Pension Claims

(S) - Secured
(A) - Administrative
(B) - 503(b)(9)
(P) - Priority
(U) - Unsecured
(T) - Total Claimed

EXHIBIT 1
No Liability Claims - Pension Claims

Objectionable Claims

	Name/Address of Claimant	Claim #	Filed Date	Debtor/Case #	Claim Amount		
1	Patricia Bagsby 3550 Crestview Dr Pittsburg, CA 94565	1123	6/22/20	The McClatchy Company 20-10418	\$	-	(S)
						-	(A)
						-	(B)
						-	(P)
						-	(U)
					\$	-	(T)
2	Patricia Benson Matthews 504 Margaret Hiatt Court Greensboro, NC 27455-2519	189	6/5/20	The McClatchy Company 20-10418	\$	-	(S)
						-	(A)
						-	(B)
						674.20	(P)
						-	(U)
					\$	674.20	(T)
3	Patricia G. Franklin Gerth Richard E. Flowers, P.C. 1214 1st Ave, Suite 320 Columbus, GA 31902	1388	6/25/20	Columbus-Ledger Enquirer, Inc. 20-10424	\$	-	(S)
						-	(A)
						-	(B)
						-	(P)
						-	(U)
					\$	-	(T)
4	Patricia Gail Franklin 1214 1st Ave, Suite 320 Columbus, GA 31902	1691	6/24/20	Columbus-Ledger Enquirer, Inc. 20-10424	\$	-	(S)
						-	(A)
						-	(B)
						-	(P)
						906.21	(U)
					\$	906.21	(T)
5	Patricia J East 3402 Timothy Circle Phenix City, AL 36867-1636	986	6/18/20	The McClatchy Company 20-10418	\$	-	(S)
						-	(A)
						-	(B)
						-	(P)
						-	(U)
					\$	-	(T)
6	Patricia J Richardson 308 Deauville Dr Fort Worth, TX 76108-3786	1205	6/22/20	The McClatchy Company 20-10418	\$	-	(S)
						-	(A)
						-	(B)
						65,195.76	(P)
						-	(U)
					\$	65,195.76	(T)
7	Patricia L Neky 3525 San Clemente Ave180 Modesto, CA 95356-0788	2271	7/12/20	The McClatchy Company 20-10418	\$	-	(S)
						-	(A)
						-	(B)
						-	(P)
						-	(U)
					\$	-	(T)
8	Patricia Purser 103 Calle Mayor Street Warner Robins, GA 31088	2634	9/22/20	The McClatchy Company 20-10418	\$	-	(S)
						-	(A)
						-	(B)
						-	(P)
						22,000.00	(U)
					\$	22,000.00	(T)
9	Patrick C Yeung 9705 Ridgemore Dr Charlotte, NC 28277-2310	195	6/5/20	The McClatchy Company 20-10418	\$	-	(S)
						-	(A)
						-	(B)
						-	(P)
						-	(U)
					\$	-	(T)
10	Patrick Dillon 2238 Schaeffer Road Sebastopol, CA 95472-5556	204	6/5/20	The McClatchy Company 20-10418	\$	-	(S)
						-	(A)
						-	(B)
						-	(P)
						-	(U)
					\$	-	(T)
11	Patrick J Marrinan Jr 41 Delaport Way Coronado, CA 92118	1762	7/7/20	The McClatchy Company 20-10418	\$	-	(S)
						-	(A)
						-	(B)
						-	(P)
						-	(U)
					\$	-	(T)
12	Patrick Hervey 8905 Linden Dr Prairie Village, KY 66207	218	6/5/20	The McClatchy Company 20-10418	\$	-	(S)
						186.00	(A)
						-	(B)

(S) - Secured
(A) - Administrative
(B) - 503(b)(9)
(P) - Priority
(U) - Unsecured
(T) - Total Claimed

EXHIBIT 1
No Liability Claims - Pension Claims

Objectionable Claims

Name/Address of Claimant		Claim #	Filed Date	Debtor/Case #	Claim Amount	
					-	(P)
					-	(U)
					\$ 186.00	(T)
13	Patrick Maman 1220 Woodhollow Court Schererville, IN 46375	1028	6/22/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)
14	Patrick O'Donnell 33 Lanning Lane Wilkes Barre, PA 18702	1930	7/7/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)
15	Patrick T Blanchat 14827 Southwest Millikan Way Apt # 1337 Beaverton, OR 97003	2433	7/20/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)
16	Patrizzi L Margaret 51 Yankee Drive South Yarmouth, MA 02664-1626	2117	7/10/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					1,000,000.00	(P)
					-	(U)
					\$ 1,000,000.00	(T)
17	Patsy C Clements 4503 Berini Drive Durham, NC 27705-1706	2236	7/10/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)
18	Patsy L McMahon 1280 E Fairview Avenue Tulare, CA 93274-8024	389	6/8/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)
19	Patsy Moore 404 West A Street El Dorado Spg, MO 64744-2116	1246	6/26/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)
20	Paul A Bourgeois Jr 2245 Fairmount Ave Fort Worth, TX 76110	330	6/8/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)
21	Paul A Ridder 252 Myrtle Street Winnetka, IL 60093	648	6/15/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)
22	Paul A Watts 8381 E Nees Clovis, CA 93619	797	6/15/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)
23	Paul E Stephens 1702 Treasure Cay Dr Mansfield, TX 76063-8536	1255	6/26/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)

(S) - Secured
(A) - Administrative
(B) - 503(b)(9)
(P) - Priority
(U) - Unsecured
(T) - Total Claimed

EXHIBIT 1
No Liability Claims - Pension Claims

Objectionable Claims

	Name/Address of Claimant	Claim #	Filed Date	Debtor/Case #	Claim Amount	
24	Paul F Glaeser 142 Cimarand Drive Williamsville, NY 14221	965	6/17/20	The McClatchy Company 20-10418	\$ -	(S) (A) (B) (P) (U) (T)
25	Paul G Ingersoll 124 Rainier Lane Boise, ID 83702	1875	7/7/20	Idaho Statesman Publishing, LLC 20-10431	\$ -	(S) (A) (B) (P) (U) (T)
26	Paul P Chambliss 14803 21st Ave E Bradenton, FL 34212-8125	209	6/5/20	The McClatchy Company 20-10418	\$ -	(S) (A) (B) (P) (U) (T)
27	Paul Phillips Jr 4813 Shady Lane Raleigh, NC 27604	1035	6/22/20	The News & Observer Publishing Co. 20-10464	\$ -	(S) (A) (B) (P) (U) (T)
28	Paul T Tucker 1402 Waverly Dr Champaign, IL 61821-5004	366	6/8/20	The McClatchy Company 20-10418	\$ - 120,667.20 \$ 120,667.20	(S) (A) (B) (P) (U) (T)
29	Paul V. Brown 1607 Homewood Ave. Durham, NC 27707	813	6/16/20	N & O Holdings, Inc. 20-10451	\$ -	(S) (A) (B) (P) (U) (T)
30	Paula E Nick 13741 SW 32 St Miramar, FL 33027	318	6/7/20	The McClatchy Company 20-10418	\$ -	(S) (A) (B) (P) (U) (T)
31	Paulette Hawthorne 4015 Cranford Dr Apt C Charlotte, NC 28209-3659	1048	6/18/20	The Charlotte Observer Publishing Company 20-10463	\$ - 1,968.00 \$ 1,968.00	(S) (A) (B) (P) (U) (T)
32	Paulette M Haddix 8520 Dewey Street Crown Point, IN 46307	1944	7/8/20	The McClatchy Company 20-10418	\$ -	(S) (A) (B) (P) (U) (T)
33	Pavel P Natkha 8020 Mullen St SW Lakewood, WA 98409-1015	677	6/15/20	The McClatchy Company 20-10418	\$ -	(S) (A) (B) (P) (U) (T)
34	Pedro F Fonteboa 841 Avenue A Apt A Boulder City, NV 89005-2377	321	6/8/20	The McClatchy Company 20-10418	\$ - 77,663.18 \$ 77,663.18	(S) (A) (B) (P) (U) (T)
35	Peggy D Giddens 1106 N Sugartree Lane	709	6/12/20	The McClatchy Company 20-10418	\$ -	(S) (A)

(S) - Secured
(A) - Administrative
(B) - 503(b)(9)
(P) - Priority
(U) - Unsecured
(T) - Total Claimed

EXHIBIT 1
No Liability Claims - Pension Claims

Objectionable Claims

Name/Address of Claimant		Claim #	Filed Date	Debtor/Case #	Claim Amount	
Lakeland, FL 33813					-	(B)
					-	(P)
					-	(U)
					\$	- (T)
36	Peggy E Dotson PO Box 73 Prides Crossing, MA 01965	2441	7/20/20	The McClatchy Company 20-10418	\$	- (S)
					-	(A)
					-	(B)
					-	(P)
					225,246.63	(U)
					\$	225,246.63 (T)
37	Peggy L Brodeur 5035 28th Ave S Apt 211 Fargo, ND 58104	1081	6/19/20	The McClatchy Company 20-10418	\$	- (S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$	- (T)
38	Peggy M Ross Citron 3739 Oasis Springs Road NE Rio Rancho, NM 87144	647	6/15/20	The McClatchy Company 20-10418	\$	- (S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$	- (T)
39	Peggy M Hatcher 9516 Drury Ave Apt 206 Kansas City, MO 64137-1234	1874	7/7/20	The McClatchy Company 20-10418	\$	- (S)
					-	(A)
					-	(B)
					502.01	(P)
					-	(U)
					\$	502.01 (T)
40	Peggy M Krueger 251 East Seminole Drive Byron, GA 31008-4122	1422	6/26/20	Macon Telegraph Publishing Company 20-10436	\$	- (S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$	- (T)
41	Peggy R Anthony 12218 Windy Wood Ct Charlotte, NC 28273	2223	7/10/20	The McClatchy Company 20-10418	\$	- (S)
					-	(A)
					-	(B)
					300,000.00	(P)
					-	(U)
					\$	300,000.00 (T)
42	Penelope Ziegenhirt 8387 SE Croft Circle #Q3 Hobe Sound, FL 33455-6385	1094	6/20/20	The McClatchy Company 20-10418	\$	- (S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$	- (T)
43	Penny D Starr-Vecchione 5007 Ames St NE Washington, DC 20019-5310	977	6/18/20	The McClatchy Company 20-10418	\$	- (S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$	- (T)
44	Perry L Huffman 8335 N Barton Fresno, CA 93710	979	6/18/20	The McClatchy Company 20-10418	\$	- (S)
					-	(A)
					-	(B)
					-	(P)
					1,576.92	(U)
					\$	1,576.92 (T)
45	Perseo Agualimpia 10852 SW 88 St Apt 301 Miami, FL 33176	1446	6/27/20	The McClatchy Company 20-10418	\$	- (S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$	- (T)
46	Peter B Hillan 12 Sterling Lane Scotts Valley, CA 95066	2112	7/9/20	The McClatchy Company 20-10418	\$	- (S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)

(S) - Secured
(A) - Administrative
(B) - 503(b)(9)
(P) - Priority
(U) - Unsecured
(T) - Total Claimed

EXHIBIT 1
No Liability Claims - Pension Claims

Objectionable Claims

Name/Address of Claimant		Claim #	Filed Date	Debtor/Case #	Claim Amount	
					\$	- (T)
47 Peter Felsenfeld 909 Bridge Rd San Leandro, CA 94577-3805		856	6/17/20	The McClatchy Company 20-10418	\$	- (S)
						- (A)
						- (B)
						- (P)
					20,100.00	(U)
					\$	20,100.00 (T)
48 Peter H Vandevanter 2130 N St NW Apt 511 Washington, DC 20037-3046		284	6/7/20	The McClatchy Company 20-10418	\$	- (S)
						- (A)
						- (B)
					963.96	(P)
						- (U)
					\$	963.96 (T)
49 Peter Moore 3458 Ladoga Ave Long Beach, CA 90808-2950		1658	7/5/20	The McClatchy Company 20-10418	\$	- (S)
						- (A)
						- (B)
					20,487.00	(P)
						- (U)
					\$	20,487.00 (T)
50 Peter R Ayala 5724 Caballo St Fort Worth, TX 76179-7740		463	6/10/20	Star-Telegram, Inc. 20-10460	\$	- (S)
						- (A)
						- (B)
					10,000.00	(P)
						- (U)
					\$	10,000.00 (T)
51 Pharris L Jones 5624 SW 19th St West Park, FL 33023-3063		1244	6/26/20	The McClatchy Company 20-10418	\$	- (S)
						- (A)
						- (B)
						- (P)
						- (U)
					\$	- (T)
52 Phillip D McFadden 1100 Barton Street Columbia, SC 29203-4270		2125	7/10/20	The State Media Company 20-10465	\$	- (S)
						- (A)
						- (B)
						- (P)
						- (U)
					\$	- (T)
53 Philip G Nussel 731 Berkshire Dr Saline, MI 48176		565	6/12/20	The McClatchy Company 20-10418	\$	- (S)
						- (A)
						- (B)
						- (P)
						- (U)
					\$	- (T)
54 Philip M LaRose 2010 Glasgow Ave Baton Rouge, LA 70808-4003		578	6/12/20	The McClatchy Company 20-10418	\$	- (S)
						- (A)
						- (B)
						- (P)
						- (U)
					\$	- (T)
55 Phillip W Drake 303 Rainbow Lake Drive Hendersonville, NC 28739-3935		2337	7/13/20	The McClatchy Company 20-10418	\$	- (S)
						- (A)
						- (B)
						- (P)
						- (U)
					\$	- (T)
56 Phu Tonthat 303 E Bullard Ave #140 Fresno, CA 93710-5251		1634	7/4/20	McClatchy Newspapers, Inc. 20-10444	\$	- (S)
						- (A)
						- (B)
						- (P)
						- (U)
					\$	- (T)
57 Phyllis J Conway 1790 Wedgewood Ct Crown Point, IN 46307-5311		208	6/5/20	The McClatchy Company 20-10418	\$	- (S)
						- (A)
						- (B)
						- (P)
						- (U)
					\$	- (T)
58 Primmie Whitaker 827 Hadley Rd		1342	6/24/20	The McClatchy Company 20-10418	\$	- (S)
						- (A)

(S) - Secured
(A) - Administrative
(B) - 503(b)(9)
(P) - Priority
(U) - Unsecured
(T) - Total Claimed

EXHIBIT 1
No Liability Claims - Pension Claims

Objectionable Claims

Name/Address of Claimant		Claim #	Filed Date	Debtor/Case #	Claim Amount	
Raleigh, NC 27610					-	(B)
					-	(P)
					-	(U)
					\$	- (T)
59	Priscilla L Mihal 4800 Buchanan Gary, IN 46408-4448	2536	7/31/20	The McClatchy Company 20-10418	\$	- (S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$	- (T)
60	R Richard Hood 20734 W 92nd St Lenexa, KS 66220-3442	901	6/17/20	Cypress Media, Inc. 20-10417	\$	- (S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$	- (T)
61	R Scott Pace 5010 Plantation Colony Drive Sugar Land, TX 77478	2475	7/27/20	The McClatchy Company 20-10418	\$	- (S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$	- (T)
62	Rafael Arrazcaeta 1083 SW 135th Place Miami, FL 33184	1969	7/9/20	The McClatchy Company 20-10418	\$	- (S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$	- (T)
63	Ralph B Sherman 23 Ransom Ave Castleton, NY 12033-1305	1131	6/22/20	The McClatchy Company 20-10418	\$	- (S)
					366.69	(A)
					-	(B)
					-	(P)
					-	(U)
					\$	366.69 (T)
64	Ralph E Montano 948 Freemont Way Sacramento, CA 95818	2399	7/15/20	The McClatchy Company 20-10418	\$	- (S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$	- (T)
65	Rance Palmer 6713 Plum Tree Court Citrus Heights, CA 95610	224	6/5/20	The McClatchy Company 20-10418	\$	- (S)
					-	(A)
					-	(B)
					63,000.00	(P)
					-	(U)
					\$	63,000.00 (T)
66	Randolph Beasley 1023 South 55th Street Richmond, CA 94804	1689	7/7/20	The McClatchy Company 20-10418	\$	8,067.60 (S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$	8,067.60 (T)
67	Randy J Ethridge 125 Ellas Lane Clayton, NC 27520-7530	2329	7/13/20	The McClatchy Company 20-10418	\$	- (S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$	- (T)
68	Raul C Gonzales 775 W Roger Rd, Unit 4 Tucson, AZ 85705	1950	7/8/20	The McClatchy Company 20-10418	\$	- (S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$	- (T)
69	Ray Eversole 944 Detroit Ave Lexington, KY 40505-3912	695	6/12/20	Lexington H-L Services, Inc. 20-10435	\$	- (S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)

(S) - Secured
(A) - Administrative
(B) - 503(b)(9)
(P) - Priority
(U) - Unsecured
(T) - Total Claimed

EXHIBIT 1
No Liability Claims - Pension Claims

Objectionable Claims

Name/Address of Claimant		Claim #	Filed Date	Debtor/Case #	Claim Amount	
					\$	- (T)
70	Raye M Deusinger 1333 Chobee St Okeechobee, FL 34974-0468	1241	6/26/20	The McClatchy Company 20-10418	\$	- (S) - (A) - (B) - (P) 37,288.32 (U) \$ 37,288.32 (T)
71	Raymond Curry 2510 Wadsworth Road Norton, OH 44203-5367	2061	7/9/20	McClatchy Newspapers, Inc. 20-10444	\$	- (S) - (A) - (B) - (P) - (U) \$ - (T)
72	Raymond D Schmidt 3192 Bullard Ave Clovis, CA 93619-8517	536	6/11/20	The McClatchy Company 20-10418	\$	- (S) - (A) - (B) - (P) - (U) \$ - (T)
73	Raymond Caraballo 915 Sw 100 Ct Miami, FL 33174	1797	7/8/20	The McClatchy Company 20-10418	\$	- (S) - (A) - (B) 25,000.00 (P) - (U) \$ 25,000.00 (T)
74	Raymond G. MacLean 18 Songbird Road Trabuco Canyon, CA 92679	152	5/16/20	The McClatchy Company 20-10418	\$	- (S) - (A) - (B) - (P) 566,240.00 (U) \$ 566,240.00 (T)
75	Raymond W Corl 5957 Morgan Run Road West Decatur, PA 16878-9621	2474	7/27/20	The McClatchy Company 20-10418	\$	- (S) - (A) - (B) - (P) - (U) \$ - (T)
76	Raymond W Potter 309 Schuyler Avenue Scales Mound, IL 61075	327	6/8/20	The McClatchy Company 20-10418	\$	- (S) - (A) - (B) - (P) - (U) \$ - (T)
77	Reba Roberts 661 Tally Rd Apt 1144 Lexington, KY 40502	506	6/10/20	The McClatchy Company 20-10418	\$	- (S) - (A) - (B) - (P) - (U) \$ - (T)
78	Rebecca Jane Bates 1213 Morning Side Dr Lexington, KY 40509	2344	7/13/20	The McClatchy Company 20-10418	\$	- (S) - (A) - (B) - (P) - (U) \$ - (T)
79	Rebecca L Carlton 9208 Cub Trail Raleigh, NC 27615	2155	7/10/20	The News & Observer Publishing Co. 20-10464	\$	- (S) - (A) - (B) - (P) - (U) \$ - (T)
80	Rebecca S Uzzle 112 Kelsey Court Clayton, NC 27520	885	6/16/20	The McClatchy Company 20-10418	\$	- (S) - (A) - (B) - (P) - (U) \$ - (T)
81	Regina A Knox 114 Grayfox Ln	199	6/5/20	The McClatchy Company 20-10418	\$	- (S) - (A)

(S) - Secured
(A) - Administrative
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EXHIBIT 1
No Liability Claims - Pension Claims

Objectionable Claims

Name/Address of Claimant		Claim #	Filed Date	Debtor/Case #	Claim Amount	
Mount Holly, NC 28120					-	(B)
					2,000.00	(P)
					-	(U)
					\$ 2,000.00	(T)
82	Reina Vazquez Ponce 8870 SW 92 Place Miami, FL 33176	2035	7/9/20	Miami Herald Media Company 20-10450	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)
83	Renee Ittner McManus 2 Stablegate Ct Columbia, SC 29229	1464	6/30/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					44,100.50	(U)
					\$ 44,100.50	(T)
84	Renee Kessler 2411 E 4th St Duluth, MN 55812	2312	7/14/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)
85	Rhonda Johnson Stokes 4880 Cameron Valley Parkway Charlotte, NC 28210	1268	6/29/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)
86	Rhonda L McClendon PO Box 473235 Miami, FL 33247-3235	1650	7/5/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)
87	Richard A Hunter 526 Pacific Ave Apt 403 Atlantic City, NJ 08401	2432	7/20/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)
88	Richard C Black 6921 Raytown Rd Raytown, MO 64133	1668	7/6/20	McClatchy Newspapers, Inc. 20-10444	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)
89	Richard D Mauer 10215 Schneider Dr Anchorage, AK 99507	1571	6/30/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					221,108.30	(P)
					-	(U)
					\$ 221,108.30	(T)
90	Richard J Rodarte 4420 S Dogwood Ave Tucson, AZ 85730-4209	1331	7/3/20	The McClatchy Company 20-10418	\$ 50,273.00	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ 50,273.00	(T)
91	Richard L Mann 12916 S Ramsgate St, Apt B Olathe, KS 66062-5138	2314	7/13/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)
92	Richard M Hooie 5216 39th Avenue West Bradenton, FL 34209	1397	6/29/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)

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EXHIBIT 1
No Liability Claims - Pension Claims

Objectionable Claims

Name/Address of Claimant		Claim #	Filed Date	Debtor/Case #	Claim Amount	
					\$	- (T)
93	Richard M Nagel 3708 Lake Powhatan Williamsburg, VA 23188	1656	7/6/20	The McClatchy Company 20-10418	\$	- (S) - (A) - (B) - (P) - (U) - (T)
94	Richard Mansapit 1628 Rio Verde Circle Pittsburg, CA 94565	1632	7/3/20	The McClatchy Company 20-10418	\$	- (S) - (A) - (B) 107.07 (P) - (U) 107.07 (T)
95	Richard Stouch 211 Maywood Rd York, PA 17402-3035	2029	7/9/20	The McClatchy Company 20-10418	\$	- (S) - (A) - (B) - (P) - (U) - (T)
96	Richard W Brownlee 9207 Hardy Street Overland Park, KS 66212-3136	807	6/15/20	The McClatchy Company 20-10418	\$	- (S) - (A) - (B) - (P) 784.65 (U) 784.65 (T)
97	Rick Biggs 1761 Castellina Drive Brentwood, CA 94513	244	6/6/20	The McClatchy Company 20-10418	\$	- (S) - (A) - (B) - (P) - (U) - (T)
98	Ricky M Tolbert 6311 Old Hickory Court Charlotte, NC 28227	301	6/7/20	The McClatchy Company 20-10418	\$	67,709.36 (S) - (A) - (B) - (P) - (U) 67,709.36 (T)
99	Rita F Rowe 320 N Booth Calloway Rd #2805 Hurst, TX 76053	692	6/12/20	The McClatchy Company 20-10418	\$	- (S) - (A) - (B) - (P) - (U) - (T)
100	Rita R Libman 5921 Pikes Peak Way Citrus Heights, CA 95621	2080	7/6/20	The McClatchy Company 20-10418	\$	- (S) - (A) - (B) - (P) - (U) - (T)