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– and –

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*Counsel for Plan Administration Trustee*

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

-----	X	
<b><i>In re</i></b>	:	<b>Chapter 11</b>
	:	
<b>JCK LEGACY COMPANY, <i>et al.</i>,</b>	:	<b>Case No. 20-10418 (MEW)</b>
	:	
<b>Wind-Down Debtors.<sup>1</sup></b>	:	<b>(Jointly Administered)</b>
	:	
-----	X	Related Docket Nos. 895 and 900

**CERTIFICATE OF NO OBJECTION TO  
PLAN ADMINISTRATION TRUSTEE'S  
SECOND OMNIBUS OBJECTION TO CLAIMS  
(EQUITY INTEREST CLAIMS)**

<sup>1</sup> 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.



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

The undersigned counsel to Sean M. Harding, a Senior Managing Director with FTI Consulting, Inc. and the Plan Administration Trustee for JCK Legacy Company and certain of its affiliates (the “**Plan Administration Trustee**”), respectfully states:

1. On October 5, 2020, the Plan Administration Trustee filed and served the *Plan Administration Trustee’s Second Omnibus Objection to Claims (Equity Interest Claims)* [Docket No. 895] (the “**Application**”) (with supporting documents), together with a Notice of Hearing (the “**Notice**”).

2. On October 9, 2020, the Plan Administration Trustee filed and served the *Notice of Filing of Revised Exhibit 1 to the Declaration of Sean M. Harding in Support of the Plan Administration Trustee’s Second Omnibus Objection to Claims (Equity Interest Claims)* [Docket No. 900].

3. The Notice stated, among other things, that objections to the Application were to be filed and served so that they were actually received no later than November 12, 2020 at 4:00 p.m. (Prevailing Eastern Time).

4. The undersigned counsel hereby certifies that, as of the date hereof, no objection to the Application has been received. Undersigned counsel further certifies that he has reviewed the docket in this case and no answer, objection, or other response to the Application appears thereon.

5. In accordance with Rule 9075-2 of the Local Bankruptcy Rules for the Southern District of New York, this certificate is being filed at least forty-eight (48) hours after expiration of the deadline for parties to file and serve any answer, objection, or response to the Application.

6. Due to the foregoing, it is respectfully requested that the Court enter the Order attached hereto as **Exhibit A**, a blacklined version of which order against the original version is attached hereto as **Exhibit B**.

Dated: New York, New York  
November 17, 2020

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– and –

TOGUT, SEGAL & SEGAL LLP

/s/ Kyle J. Ortiz

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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>	:	<b>Chapter 11</b>
	:	
<b>JCK LEGACY COMPANY, <i>et al.</i>,</b>	:	<b>Case No. 20-10418 (MEW)</b>
	:	
<b>Wind-Down Debtors.<sup>1</sup></b>	:	<b>(Jointly Administered)</b>
	:	
-----	x	Related Docket Nos. 895 and 900

**ORDER GRANTING PLAN ADMINISTRATION  
TRUSTEE'S SECOND OMNIBUS OBJECTION TO CLAIMS  
(EQUITY INTEREST CLAIMS)**

Upon the omnibus claims objection (the “**Objection**”)<sup>2</sup> 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, reclassifying the Equity Interest Claims, as more fully set forth in the Objection; and this 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 appearing that no

<sup>1</sup> 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.

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

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 a Certificate of No Objection concerning the Objection having been filed on November 17, 2020; 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 Equity Interest Claims listed on **Exhibit 1** attached hereto are hereby reclassified as proofs of equity interests.
3. Each Equity Interest Claim and the objections by the Plan Administration Trustee to each Equity Interest Claim as identified and set forth on **Exhibit 1** attached hereto constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each Equity Interest Claim. Any stay of this Order shall apply only to the contested matter that involves such interest holder and its Equity Interest Claim and shall not act to stay the applicability or finality of this Order with respect to the other contested matters and corresponding Equity Interest Claims.
4. The Plan Administration Trustee shall have the right to further object in the future on any ground to any of the Equity Interest 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 Equity Interest 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 Equity Interest 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

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Honorable Michael E. Wiles  
UNITED STATES BANKRUPTCY JUDGE

**EXHIBIT 1**

**Equity Interest Claims**



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

**EXHIBIT 1**  
**Equity Interest Claims**

**Objectable Claims**

	Name/Address of Claimant	Claim #	Filed Date	Debtor/Case #	Claim Amount
1	Adi Navroji Kasad 122 Christine Drive Downingtown, PA 19335	1949	7/8/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) 12,849.99 (U) \$ 12,849.99 (T)
2	Amy Kok 35 Clark St B2 Brooklyn, NY 11201	2036	7/9/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) 5,000.00 (U) \$ 5,000.00 (T)
3	Ann Dumouchelle 2470 Churchill Trenton, MI 48183	1171	6/23/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) 155.25 (U) \$ 155.25 (T)
4	Arlene Versaw 1131 Jonagold Way Brentwood, CA 94513	2280	7/9/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
5	Barbara Dutra 5751 W Hallmark Ct Boise, ID 83703	473	6/10/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) 3,203.48 (U) \$ 3,203.48 (T)
6	Blanca Gonzalez 13013 War Bonnet Street San Diego, CA 92129	1687	7/6/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) 1,297.80 (U) \$ 1,297.80 (T)
7	Brigit G Ferguson Conway 411 Wappoo Rd Charleston, SC 29407	1582	7/1/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) 500.00 (U) \$ 500.00 (T)
8	Bruce Y. Kwan 1154 Bellevue Ave Apt 116 Los Angeles, CA 90012	997	6/19/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
9	Caesar Vicente 1380 Cuciz Lane Milpitas, CA 95035	1735	7/7/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
10	Chaz Beasley 11619 Hophornbeam Ln	1593	7/1/20	The McClatchy Company 20-10418	\$ - (S) - (A)

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

**EXHIBIT 1**  
**Equity Interest Claims**

**Objectionable Claims**

Name/Address of Claimant		Claim #	Filed Date	Debtor/Case #	Claim Amount
Charlotte, NC 28278					- (B)
					- (P)
					1,062.23 (U)
					\$ 1,062.23 (T)
11	Cheryl L. Jensen 830 E Normal Fresno, CA 93704-6113	910	6/17/20	The McClatchy Company 20-10418	\$ - (S)
					- (A)
					- (B)
					- (P)
					133.50 (U)
					\$ 133.50 (T)
12	Clark C. Hartman & Pamela S. Hartman 12050 Grotto Rd Brazil, IN 47834-9238	2281	7/9/20	The McClatchy Company 20-10418	\$ - (S)
					- (A)
					- (B)
					- (P)
					5,120.00 (U)
					\$ 5,120.00 (T)
13	Cline Living Trust Stock Portfolio UA Jun 02, 1998/Craig 3384 Augusta National Dr. S. Salem, OR 97302	1860	7/7/20	The McClatchy Company 20-10418	\$ - (S)
					- (A)
					- (B)
					- (P)
					- (U)
					\$ - (T)
14	Dale Filbert 7523 Saginaw Way Citrus Heights, CA 95610	1608	7/1/20	The McClatchy Company 20-10418	\$ - (S)
					- (A)
					- (B)
					- (P)
					7,574.00 (U)
					\$ 7,574.00 (T)
15	Denise M Szott 11308 SE 30th Avenue Milwaukie, OR 97222	2163	7/10/20	The McClatchy Company 20-10418	\$ - (S)
					- (A)
					- (B)
					- (P)
					- (U)
					\$ - (T)
16	Dennis C. Andrews 2579 Southcrest Ave Maplewood, MN 55119	2318	7/13/20	The McClatchy Company 20-10418	\$ - (S)
					- (A)
					- (B)
					- (P)
					26,227.60 (U)
					\$ 26,227.60 (T)
17	Donna Loraine Pincus 906 North Shore Dr. Leesburg, FL 34748	730	6/12/20	The McClatchy Company 20-10418	\$ - (S)
					- (A)
					- (B)
					- (P)
					- (U)
					\$ - (T)
18	Donnie Mack Autry 785 Fleet Cooper Rd Roseboro, NC 28382	2435	7/21/20	The McClatchy Company 20-10418	\$ - (S)
					- (A)
					- (B)
					- (P)
					856.75 (U)
					\$ 856.75 (T)
19	Dora M. Williams & Phyllis A. Black 3065 N.W. 68 St Miami, FL 33147	1233	6/25/20	The McClatchy Company 20-10418	\$ - (S)
					- (A)
					- (B)
					- (P)

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

**EXHIBIT 1**  
**Equity Interest Claims**

Objectionable Claims				
Name/Address of Claimant	Claim #	Filed Date	Debtor/Case #	Claim Amount
				- (U)
				\$ - (T)
20 Francis Ryan 35415 Ridge Richmond, MI 48062	2377	7/15/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) 2,000.00 (U) \$ 2,000.00 (T)
21 Gary Ragusa 127 West 15th Street 4R New York, NY 10011	302	6/7/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) 840.63 (U) \$ 840.63 (T)
22 Geneva Sue Moorhead 7442 Teaswood Drive Conroe, TX 77304	2295	7/13/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
23 George G Flamm and Audrey M Flamm 270 Mt. Laurel Rd Mount Laurel, NJ 08054	994	6/19/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
24 Gerald W Ward 5714 W Yellowstone Ave Kennewick, WA 99336-1303	1694	7/6/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) 129.30 (U) \$ 129.30 (T)
25 Invesco Bulletshares 2026 High Yield Corporate Bond ETF of Invesco Capital Management LLC 11 Greenway Plaza, Suite 1000 Houston, TX 77046	1340	7/3/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) 162,000.00 (U) \$ 162,000.00 (T)
26 Jack Cooper 6831 Calvin Dr. Citrus Heights, CA 95621	762	6/15/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) 1,066.00 (U) \$ 1,066.00 (T)
27 Jacquelyn Hoflich 302 Southcreek Lane Fircrest, WA 98466	1435	6/26/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
28 James Joseph Cook 1820 Lexington Ave North Roseville, MN 55113-6153	744	6/15/20	The McClatchy Company 20-10418	\$ - (S) 5,000.00 (A) - (B) - (P) - (U) \$ 5,000.00 (T)

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

**EXHIBIT 1**  
**Equity Interest Claims**

**Objectionable Claims**

	Name/Address of Claimant	Claim #	Filed Date	Debtor/Case #	Claim Amount
29	JAN HANSEN 234 SUNSHINE CIRCLE SW MATTAWA, WA 99349	759	6/15/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
30	Jeffrey D. Ruff 4996 Northwest Dr Bellingham, WA 98226	1550	7/1/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) 309.45 (U) \$ 309.45 (T)
31	John Couch 3045 Lake Bluff Decatur, IL 62521	2171	7/10/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) 3,998.00 (U) \$ 3,998.00 (T)
32	John Evan Roberts 512 Wildwood E. Lansing, MI 48823	951	6/16/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) 2,290.60 (U) \$ 2,290.60 (T)
33	John T. Russial 941 Almaden St Eugene, OR 97402	2333	7/13/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
34	Jon Ledversis, Through Fidelity Investments 188 LedgeWood Drive Hanover, MA 02339	902	6/17/20	The McClatchy Company 20-10418	\$ 938.00 (S) - (A) - (B) - (P) - (U) \$ 938.00 (T)
35	Juli Warren-Ward and Douglas B. Ward 1311 Spencer Dr. Lawrence, KS 66044	2265	7/10/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
36	Karen Barber Lands 1821 Windy Rush Lane Gastonia, NC 28054	1924	7/7/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) 30.72 (U) \$ 30.72 (T)
37	Karen Irene Weightman 6510 Mercer Road , BC V0K 2E3	1908	7/7/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) 540.46 (U) \$ 540.46 (T)
38	Lee W. Morris 11020 Huebner Oaks #2421	1931	7/7/20	The McClatchy Company 20-10418	\$ - (S) - (A)

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

**EXHIBIT 1**  
**Equity Interest Claims**

**Objectionable Claims**

Name/Address of Claimant		Claim #	Filed Date	Debtor/Case #	Claim Amount
San Antonio, TX 78230-1147					- (B)
					- (P)
					108,984.70 (U)
					\$ 108,984.70 (T)
39	Lemuel E. Lewis 9111 River Crescent Suffolk, VA 23433	2317	7/13/20	The McClatchy Company 20-10418	\$ - (S)
					- (A)
					- (B)
					- (P)
					199,000.00 (U)
					\$ 199,000.00 (T)
40	Lesli Meyer 445 Sterling Place Ridgewood, NJ 07450	2319	7/13/20	The McClatchy Company 20-10418	\$ - (S)
					- (A)
					- (B)
					- (P)
					- (U)
					\$ - (T)
41	LISA FAUBION 9007 W 128TH ST OVERLAND PARK, KS 66213	985	6/18/20	The McClatchy Company 20-10418	\$ - (S)
					- (A)
					- (B)
					- (P)
					1,000.00 (U)
					\$ 1,000.00 (T)
42	LORRAINE SIMMONS 109 CHARTWELL RD. COLUMBIA, SC 29210	1272	6/29/20	The McClatchy Company 20-10418	\$ - (S)
					- (A)
					- (B)
					- (P)
					- (U)
					\$ - (T)
43	Maida Odom 3121 North 33rd Street Philadelphia, PA 19132	1968	7/9/20	Quad County Publishing, Inc. 20-10458	\$ - (S)
					- (A)
					- (B)
					- (P)
					- (U)
					\$ - (T)
44	Margaret Spargo 2754 Pepperwood Pl Hayward, CA 94541	616	6/13/20	The McClatchy Company 20-10418	\$ - (S)
					- (A)
					- (B)
					- (P)
					3,000.00 (U)
					\$ 3,000.00 (T)
45	Michael A Levin 1645 Eastlake Way Weston, FL 33326	764	6/15/20	The McClatchy Company 20-10418	\$ - (S)
					- (A)
					- (B)
					1,280.00 (P)
					- (U)
					\$ 1,280.00 (T)
46	Michael Kirk Lands & Karen Barber Lands JT Ten 1821 Windy Rush Lane Gastonia, NC 28054	1869	7/7/20	The McClatchy Company 20-10418	\$ - (S)
					- (A)
					- (B)
					- (P)
					107.52 (U)
					\$ 107.52 (T)
47	Michele Terry 3075 SE St Lucie Blvd Stuart, FL 34997	1127	6/22/20	The McClatchy Company 20-10418	\$ - (S)
					- (A)
					- (B)
					- (P)

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

**EXHIBIT 1**  
**Equity Interest Claims**

**Objectable Claims**

Name/Address of Claimant		Claim #	Filed Date	Debtor/Case #	Claim Amount	
					227.80	(U)
					\$ 227.80	(T)
48	Najmah Singleton 6608 Hemsworth Terrace Charlotte, NC 28227	345	6/8/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)
49	Nancy L Williams 11616 Prospect Hill Dr Gold River, CA 95670	2097	6/25/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					45.89	(U)
					\$ 45.89	(T)
50	Patricia Crouse 265 E Bay Cedar Cir Jupiter, FL 33458	847	6/16/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)
51	Paul Richardson 4029 E Sunset Dr Bellingham, WA 98226	2102	7/9/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)
52	Praful A. Patel 765 Wood Avenue Edison, NJ 08820	2346	7/13/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					5,504.00	(U)
					\$ 5,504.00	(T)
53	Richard J. Scoppe Jr. 104 Country Club Drive Jacksonville, NC 28546	2324	7/13/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					593.44	(U)
					\$ 593.44	(T)
54	Russell V Johnson 359 Betty Lane Saint Paul, MN 55118-2904	1378	6/29/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)
55	Sandra Harnagel-Fox 908 Station Avenue Haddon Heights, NJ 08035	1834	7/7/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					1,285.68	(U)
					\$ 1,285.68	(T)
56	Sannazzaro Family Trust 1233 Dixie Mountain Drive South Lake Tahoe, CA 96150	2290	7/13/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					5,000.00	(U)
					\$ 5,000.00	(T)

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

**EXHIBIT 1**  
**Equity Interest Claims**

**Objectionable Claims**

	Name/Address of Claimant	Claim #	Filed Date	Debtor/Case #	Claim Amount
57	Stifel Nicolaus c/f Gay B Prater PO Box 7 Boynton Beach, FL 33425	2379	7/15/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) 4,023.44 (U) \$ 4,023.44 (T)
58	Theresa Martin Harris 4176 Menderes Dr. Powell, OH 43065	1896	7/7/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
59	Theresa Maynetta Martin 4176 Menderes Dr. Powell, OH 43065	2391	7/16/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
60	Todd Janovics 1104 South Oakwood Drive Mount Prospect, IL 60056	2267	7/11/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
61	Vernon E Dick 1120 N W Hobbs Road Cornelius, OR 97113-6345	1568	7/1/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) 129.30 (U) \$ 129.30 (T)
62	William James Fraser 115 Denholm Gate, Suite 402 Fort McMurray, AB T9H 0E9	1055	6/18/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) 330.24 (U) \$ 330.24 (T)

**EXHIBIT B**

**Blacklined Proposed Order**



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

----- x  
*In re* : **Chapter 11**  
:   
JCK LEGACY COMPANY, *et al.*, : **Case No. 20-10418 (MEW)**  
:   
Wind-Down Debtors.<sup>1</sup> : **(Jointly Administered)**  
:   
----- x [Related Docket Nos. 895 and 900](#)

**ORDER GRANTING PLAN ADMINISTRATION  
TRUSTEE'S SECOND OMNIBUS OBJECTION TO CLAIMS  
(EQUITY INTEREST CLAIMS)**

Upon the omnibus claims objection (the “**Objection**”)<sup>2</sup> 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, reclassifying the Equity Interest Claims, as more fully set forth in the Objection; and this 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 appearing that no

<sup>1</sup> 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.

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

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~~ a Certificate of No Objection concerning the Objection having been filed on November 17, 2020; 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 Equity Interest Claims listed on **Exhibit 1** ~~to the Declaration, annexed to the Objection,~~ attached hereto are hereby reclassified as proofs of equity interests.
3. Each Equity Interest Claim and the objections by the Plan Administration Trustee to each Equity Interest Claim as identified and set forth on **Exhibit 1** ~~to the Declaration~~ attached hereto constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each Equity Interest Claim. Any stay of this Order shall apply only to the contested matter that involves such interest holder and its Equity Interest Claim and shall not act to stay the applicability or finality of this Order with respect to the other contested matters and corresponding Equity Interest Claims.
4. The Plan Administration Trustee shall have the right to further object in the future on any ground to any of the Equity Interest 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 Equity Interest 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 Equity Interest 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

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Honorable Michael E. Wiles  
UNITED STATES BANKRUPTCY JUDGE