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– and –

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– and –

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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	Related Docket No. 914

**CERTIFICATE OF NO OBJECTION TO
PLAN ADMINISTRATION TRUSTEE'S
SEVENTH 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.



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 19, 2020, the Plan Administration Trustee filed and served the *Plan Administration Trustee’s Seventh Omnibus Objection to Claims (No Liability Claims – Pension Claims)* [Docket No. 914] (the “**Application**”) (with supporting documents), together with a Notice of Hearing (the “**Notice**”).

2. 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).

3. 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.

4. 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.

5. 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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/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
In re : **Chapter 11**
:
JCK LEGACY COMPANY, *et al.*, : **Case No. 20-10418 (MEW)**
:
Wind-Down Debtors.¹ : **(Jointly Administered)**
:
----- x Related Docket No. 914

**ORDER GRANTING PLAN ADMINISTRATION
TRUSTEE'S SEVENTH 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

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 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 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 No Liability Claims listed on **Exhibit 1** attached hereto 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** 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 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 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	Diana R Young 26348 Santa Barbara Drive Edwards, MO 65326-3072	712	6/12/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
2	Diana Snider 1225 N Withers Road Liberty, MO 64068	939	6/16/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
3	Diana Tyler 26348 Santa Barbara Drive Edwards, MO 65326-3072	713	6/12/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
4	Diane B Jacaruso 8308 Thornridge Ln Tallahassee, FL 32312-5010	1912	7/7/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) 59,716.07 (U) \$ 59,716.07 (T)
5	Diane I Carroll 4116 W 69th St Prairie Village, KS 66208	1344	7/3/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
6	Diane Kozelka 7309 Mayflower Rd NE Albuquerque, NM 87109	1589	7/1/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
7	Diane Vitzthum 15819 83rd Ave E Puyallup, WA 98375	2320	7/13/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
8	Diane Walsh 169 Virginville Rd Kutztown, PA 19530-8862	858	6/16/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
9	Diane Y Liang 271 Los Felicas Avenue Walnut Creek, CA 94598	382	6/8/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) 112,320.00 (U) \$ 112,320.00 (T)
10	Dianne I Nelson 15848 Emperor Ave Apt 207 Apple Valley, MN 55124-7881	1856	7/7/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
11	Dionne Hall 3732 Ridge View Way Lexington, KY 40509	2205	7/10/20	Lexington H-L Services, Inc. 20-10435	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
12	Dolores Goodman 1361 Knollcrest Circle	1759	7/8/20	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	
	Bloomfield Hills, MI 48304				\$	- (B) - (P) - (U) - (T)
13	Dolores J West 4812 Lamond Ct Fort Worth, TX 76117	1958	7/8/20	The McClatchy Company 20-10418	\$	- (S) - (A) - (B) - (P) - (U) - (T)
14	Donald Shellum 8542 Ivan Ave S Cottage Grove, MN 55016	1102	6/20/20	The McClatchy Company 20-10418	\$	- (S) - (A) - (B) - (P) - (U) - (T)
15	Donald C Thompson 4751 Maple Ellery Road Bemus Point, NY 14712	1030	6/22/20	The McClatchy Company 20-10418	\$	- (S) - (A) - (B) - (P) - (U) - (T)
16	Donald E Scott 1013 Great Hall Drive Lebanon, PA 17042-3214	873	6/16/20	The McClatchy Company 20-10418	\$	- (S) - (A) - (B) - (P) - (U) - (T)
17	Donald E Wieger Jr 402 Sweetbay Court Versailles, KY 40383	1609	7/2/20	The McClatchy Company 20-10418	\$	- (S) - (A) - (B) - (P) - (U) - (T)
18	Donald J Marteny 229 E Ralstone Avenue Akron, OH 44301	656	6/15/20	The McClatchy Company 20-10418	\$	- (S) - (A) - (B) - (P) - (U) - (T)
19	Donald L Wells 4904 S Gum Ave Broken Arrow, OK 74011	1073	6/19/20	The McClatchy Company 20-10418	\$	- (S) - (A) - (B) - (P) - (U) - (T)
20	Donald L Wilson 9900 S Lakeview Lane Harrison, ID 83833	1438	6/30/20	McClatchy Newspapers, Inc. 20-10444	\$	- (S) - (A) - (B) - (P) - (U) - (T)
21	Donald R Mills 4709 Firebrook Blvd Lexington, KY 40513-1460	1943	7/8/20	The McClatchy Company 20-10418	\$	- (S) - (A) - (B) - (P) - (U) - (T)
22	Donald R Slinkard 6694 East Kings Canyon Road #152 Fresno, CA 93727-3602	593	6/12/20	The McClatchy Company 20-10418	\$	- (S) - (A) - (B) - (P) - (U) - (T)
23	Donald Smith 3931 North Hwy 501 Marion, SC 29571-6489	1328	7/3/20	The Sun Publishing Company, Inc. 20-10466	\$	- (S) - (A) - (B) - (P)

(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	
					\$	- (U)
					\$	- (T)
24	Donna Adams 6929 Kipling St Fort Worth, TX 76112	245	6/6/20	Star-Telegram, Inc. 20-10460	\$	- (S)
						- (A)
						- (B)
						- (P)
						- (U)
					\$	- (T)
25	Donna Clements 1720 284th St E Roy, WA 98580	931	6/18/20	The McClatchy Company 20-10418	\$ 86,400.00	(S)
						- (A)
						- (B)
						- (P)
						- (U)
					\$ 86,400.00	(T)
26	Donna J Adams 6929 Kipling St Fort Worth, TX 76112	243	6/6/20	Star-Telegram, Inc. 20-10460	\$	- (S)
						- (A)
						- (B)
						- (P)
						- (U)
					\$	- (T)
27	Donna J Limoseth 6342 Burnham Cir Inver Grove, MN 55076-1609	1776	7/7/20	The McClatchy Company 20-10418	\$	- (S)
						- (A)
						- (B)
						- (P)
						- (U)
					\$	- (T)
28	Donna L Clements 1720 284th St E Roy, WA 98580	654	6/15/20	The McClatchy Company 20-10418	\$ 7,216.00	(S)
						- (A)
						- (B)
						- (P)
						- (U)
					\$ 7,216.00	(T)
29	Donna Phillips 1074 Panther Branch Rd Valley Mills, TX 76689-2637	1682	7/6/20	The McClatchy Company 20-10418	\$	- (S)
						- (A)
						- (B)
						- (P)
						- (U)
					\$	- (T)
30	Donna Schneider 620 3rd Ave Ne Watertown, SD 57201	1173	6/23/20	The McClatchy Company 20-10418	\$	- (S)
						- (A)
						- (B)
					125,000.00	(P)
						- (U)
					\$ 125,000.00	(T)
31	Donna Whitley 109 Wildflower Ct Brunswick, GA 31523-8929	2372	7/16/20	The McClatchy Company 20-10418	\$	- (S)
						- (A)
						- (B)
						- (P)
						- (U)
					\$	- (T)
32	Donna Worsham 4117 Woodbine Chevy Chase, MD 20815	457	6/9/20	The McClatchy Company 20-10418	\$	- (S)
						- (A)
						- (B)
						- (P)
						- (U)
					\$	- (T)
33	Donnie J Garabrandt 223 Hummel Avenue SW New Philadelphia, OH 44663	1578	6/30/20	The McClatchy Company 20-10418	\$	- (S)
						- (A)
						- (B)
					41,350.00	(P)
						- (U)
					\$ 41,350.00	(T)
34	Donnie Ray Tart 4452 Charlie Grissom Rd Kittrell, NC 27544	265	6/6/20	The News & Observer Publishing Co. 20-10464	\$	- (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
35	Dorinda S Trinka 1155 Greatwood Manor Alpharetta, GA 30005	2101	7/9/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
36	Doris Foster 141 W Trafford St Long Beach, CA 90805	1290	6/29/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
37	Doris L Felder 3507 Kingston Rd Winston-Salem, NC 27106-3636	1832	7/7/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
38	Doris L Murray 203 Ranch House Road Rockwall, TX 75032-2684	1846	7/7/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
39	Doris Mae Wilson 2636 Meadow Knoll Dr Charlotte, NC 28269	374	6/8/20	McClatchy Newspapers, Inc. 20-10444	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
40	Dorothea A Risker 1846 South Coy Kansas City, KS 66103	1305	7/3/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
41	Dorothy Aylward 4069 Glencairn Grove Stow, OH 44224	2424	7/20/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
42	Dorothy G McGary 47003 Mission Falls Ct #320 Fremont, CA 94539	883	6/16/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
43	Dorothy H Bolch 327 Northwest Park Ave Apt 2a Portland, OR 97209-3329	532	6/11/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
44	Dorothy Hart 371 Waverly Rd Chesterton, IN 46304	1553	6/29/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
45	Dorothy O Willocks 4308 East End St Charlotte, NC 28208-2302	1036	6/22/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
46	Doug Worgul 12901 Rosewood	285	6/7/20	The McClatchy Company 20-10418	\$ - (S) - (A)

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

EXHIBIT 1
No Liability Claims - Pension Claims

Objectionable Claims				
Name/Address of Claimant	Claim #	Filed Date	Debtor/Case #	Claim Amount
Leawood, KS 66209				- (B) - (P) - (U) \$ - (T)
47 Douglas Hambley 198 NW Widmer Place Albany, OR 97321	356	6/8/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) 101,793.60 (U) \$ 101,793.60 (T)
48 Douglas M Oswald 6008 Noreston Shawnee, KS 66218	426	6/9/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
49 Dove E Morris P.O. Box 16234 Chapel Hill, NC 27516	1095	6/20/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
50 DUANE KING 1803 14TH STREET CT W PALMETTO, FL 34221-2936	308	6/7/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
51 Bernice King 1803 14th Street Ct W Palmetto, FL 34221	307	6/7/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
52 Duncan J Livingston 1802 S Brookside Terrace Tacoma, WA 98465	2249	7/10/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
53 Durham A Evans 542 Browns Crossing Road Milledgeville, GA 31061	2361	7/14/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) 125.58 (U) \$ 125.58 (T)
54 Dustin L Vancleve 2917 W 19th Ave Trlr 37 Kennewick, WA 99337-2304	990	6/19/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
55 Edem B Umoren 1421 SW Merryman Dr Lee Summit, MO 64082	2326	7/13/20	McClatchy Newspapers, Inc. 20-10444	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
56 Edmund DArcy-Clarke 1243 E Escalon Ave Fresno, CA 93710	2092	7/9/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
57 Edmund E Olson 200 Idle Hour Dr Macon, GA 31210	1219	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
No Liability Claims - Pension Claims

Objectionable Claims

Name/Address of Claimant		Claim #	Filed Date	Debtor/Case #	Claim Amount
					- (U)
					\$ - (T)
58	Edna Buchanan 400 West San Marino Dr Miami Beach, FL 33139-1136	1258	6/26/20	Miami Herald Media Company 20-10450	\$ - (S) - (A) - (B) - (P) - (U)
					\$ - (T)
59	Edward Allen Register 208 Asbury Drive Saginaw, TX 76179-1207	2397	7/15/20	Star-Telegram, Inc. 20-10460	\$ - (S) - (A) - (B) - (P) - (U)
					\$ - (T)
60	Edward A Schneider 6997 80th St S #253 Cottage Grove, MN 55016-5044	1508	6/30/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U)
					\$ - (T)
61	Edward B Estes 5412 Washingtonian Dr Metairie, LA 70003-2525	2159	7/10/20	The News & Observer Publishing Co. 20-10464	\$ - (S) - (A) - (B) - (P) 118,800.00 (U)
					\$ 118,800.00 (T)
62	Edward Canale 3025 Perth Way Carmichael, CA 95608	1697	7/6/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U)
					\$ - (T)
63	Edward E. Lloyd 309 18th Street Unit A Huntington Beach, CA 92648	92	4/1/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) 30,013.20 (P) - (U)
					\$ 30,013.20 (T)
64	Edward L Ellingburg 2500 E 11th St Kansas City, MO 64127	2325	7/13/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U)
					\$ - (T)
65	Edward L Thigpen 9311 Jewel Lake Rd Unit 201 Anchorage, AK 99502-1562	1703	7/6/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U)
					\$ - (T)
66	Edward M Grohosky 59 W Woodsdale Akron, OH 44301	745	6/15/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U)
					\$ - (T)
67	Edward R Cass 3429 N Spyglass Village Path Lecanto, FL 34461	533	6/11/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U)
					\$ - (T)
68	Edwin L Ower 18070 Langlois Rd Space 278 Desert Hot Springs, CA 92241-8340	1794	7/6/20	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
69	Eileen Benninghoff 119 Plum Creed Dr Dyer, IN 46311	1023	6/22/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
70	Eileen M Reynolds 195 E Evergreen Ave Philadelphia, PA 19118-3318	897	6/17/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
71	Eileen Pryel 2064 Herschel Street #305 Jacksonville, FL 32204	1486	6/30/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
72	Elaine M Brownfield 3030 E 101st St N Valley Center, KS 67147-9167	614	6/13/20	Wichita Eagle and Beacon Publishing Company, Inc. 20-10469	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
73	Elbert Mock 9604 Lakepoint Dr Elk Grove, CA 95756-3604	1854	7/7/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
74	Elizabeth C Steindler 1143 N Rutland Ct Wichita, KS 67206-3833	1026	6/22/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
75	Elizabeth L Tigner 991 Oswichee Road Seale, AL 36875	238	6/6/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
76	Elizabeth M Guzior 3520 Eastover Ridge Drive Apt 1125 Charlotte, NC 28211	1560	7/1/20	The State Media Company 20-10465	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
77	Elizabeth Pineda 11950 168 St. N. Jupiter Florida 33478 Jupiter, FL 33478	1911	7/7/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
78	Elizabeth Pineda 12170-164 Ct North Jupiter, FL 33478	1904	7/7/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
79	Elizabeth R Cadieu 890 Seven Lakes North West End, NC 27376	1350	6/24/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) 25,295.00 (U) \$ 25,295.00 (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
80	Elizabeth R Paysinger 558 Saddlebrook Dr Rock Hill, SC 29730-6826	2544	8/3/20	The Charlotte Observer Publishing Company 20-10463	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
81	Ellen A Warren 4300 N Marine Dr #303 Chicago, IL 60613-1502	2434	7/20/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
82	Ellen Robinson-Haynes 1122 Beverly Way Sacramento, CA 95818-2212	375	6/8/20	McClatchy Newspapers, Inc. 20-10444	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
83	Emanuel Busch 3336 Park Ave Kansas City, MO 64109	1883	7/7/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
84	Emelyn C. Manibo-Monteclaro 6140 Colby Street Oakland, CA 94618	1665	7/2/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
85	Eric F Douglas 817 48Th Street Sacramento, CA 95819	2362	7/14/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
86	Eric Ridder Jr 441 Old Dutch Road Bedminster, NJ 07921-2552	1237	6/26/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
87	Eric S Asbell 343 Branch Road Mc Intyre, GA 31054	229	6/6/20	Macon Telegraph Publishing Company 20-10436	\$ - (S) - (A) - (B) 20,000.00 (P) - (U) \$ 20,000.00 (T)
88	Erin M Myers 13692 Inverness Ave NW Uniontown, OH 44685-7205	274	6/6/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
89	Ernest Felix 290 El Portal Dr Merced, CA 95340	507	6/10/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
90	Ethline H Alexander 11966 SW 110 St Cir So Miami, FL 33186-3830	1401	6/29/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
91	Etta J Thompson	569	6/12/20	The McClatchy Company	\$ - (S)

(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
764 Peerless Ave Akron, OH 44320				20-10418	- (A) - (B) 93,000.00 (P) - (U) \$ 93,000.00 (T)
92 Eugene S Tracy 3361 Claudia Court Concord, CA 94519		940	6/16/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
93 Eugenia L Dickey 2228 N Cascade Ave Colorado Spgs, CO 80907-6737		1166	6/23/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) 60,000.00 (P) - (U) \$ 60,000.00 (T)
94 Euna Houston 3448 Mahlon Moore Rd Spring Hill, TN 37174		2296	7/13/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
95 Evelyn M Massey 1897 Tuolumne Drive Reno, NV 89523		881	6/16/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
96 Evelyn Wissner 9460 Tangerine Pl #205 Ft Lauderdale, FL 33324-4439		2237	7/10/20	Miami Herald Media Company 20-10450	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
97 Ewell B Pinkston 1240 Providence Drive Lawrenceville, GA 30044		2177	7/10/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
98 F P Bernet/Francis Patrick Bernet (Retiree) 400 Woodland Way Tunkhannock, PA 18657		1459	6/29/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
99 Floyd L Hickman 8417 Gillespie Rd Napoleon, MO 64074		1490	6/30/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
100 Foy Maloy Jr PO Box 16874 Fernandina Beach, FL 32035-3132		348	6/8/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)

EXHIBIT B

Blacklined 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	<u>Related Docket No. 914</u>

**ORDER GRANTING PLAN ADMINISTRATION
TRUSTEE'S SEVENTH 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

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.

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~~ 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 No Liability Claims listed on **Exhibit 1** ~~to the Declaration, annexed to the Objection,~~ attached hereto 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~~ 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 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