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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. 925

**CERTIFICATE OF NO OBJECTION TO
PLAN ADMINISTRATION TRUSTEE'S
EIGHTEENTH 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 Eighteenth Omnibus Objection to Claims (No Liability Claims – Pension Claims)* [Docket No. 925] (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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Telephone: (212) 594-5000
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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. 925

**ORDER GRANTING PLAN ADMINISTRATION
TRUSTEE'S EIGHTEENTH 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	William D McDonald 2050 N Beltline Blvd Apt 115W Columbia, SC 29204	1405	6/26/20	The State Media Company 20-10465	\$	-	(S) (A) (B) (P) (U) (T)
2	William D Truett 1005 E Clifton St Tampa, FL 33604-6807	659	6/15/20	The Charlotte Observer Publishing Company 20-10463	\$	-	(S) (A) (B) (P) (U) (T)
3	William F Cooke 611 Manning Dr Charlotte, NC 28209	1158	6/22/20	The McClatchy Company 20-10418	\$	-	(S) (A) (B) (P) (U) (T)
4	William Fleet 199 Wild Horse Lane Norco, CA 92860	706	6/12/20	The McClatchy Company 20-10418	\$	-	(S) (A) (B) (P) (U) (T)
5	William Heatter 1701 North Treasure Drive, Apt #2 North Bay Village, FL 33141	1057	6/18/20	Miami Herald Media Company 20-10450	\$	-	(S) (A) (B) (P) (U) (T)
6	William G Hunter 4678 Whyem Dr Akron, OH 44319-4443	1561	7/2/20	The McClatchy Company 20-10418	\$	-	(S) (A) (B) (P) (U) (T)
7	William H. Case 420 Lexington Avenue, Suite 300 New York, NY 10107	2167	7/10/20	The McClatchy Company 20-10418	\$	-	(S) (A) (B) (P) (U) (T)
8	Howard Collins 162 Weatherby Dr Macon, GA 31210-8234	610	6/13/20	The McClatchy Company 20-10418	\$	-	(S) (A) (B) (P) (U) (T)
9	William H Davies 1543 W Griffith Fresno, CA 93705	353	6/9/20	The McClatchy Company 20-10418	\$	-	(S) (A) (B) (P) (U) (T)
10	William Hathaway 13100 E 44th Street Independence, MO 64055	1722	7/8/20	The McClatchy Company 20-10418	\$	-	(S) (A) (B) (P) (U) (T)
11	William J Conroy 1358 W California Ave Falcon Heights, MN 55108-2101	2422	7/20/20	The McClatchy Company 20-10418	\$	-	(S) (A) (B) (P) (U) (T)
12	William J Thornton 6044 Bear Creek Ct	2098	7/9/20	Columbus-Ledger Enquirer, Inc. 20-10424	\$	-	(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	
Columbus, GA 31909					-	(B)
					-	(P)
					-	(U)
					\$	- (T)
13	William K Huwer 13900 SW 73rd Ave Palmetto Bay, FL 33158	403	6/9/20	Miami Herald Media Company 20-10450	\$	- (S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$	- (T)
14	William K Wells 166 S Killarney Ln Apt 24 Richmond, KY 40475-1991	658	6/15/20	Lexington H-L Services, Inc. 20-10435	\$	- (S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$	- (T)
15	William L Candy 3727 West Ave Ocean City, NJ 08226-1734	875	6/16/20	The McClatchy Company 20-10418	\$	- (S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$	- (T)
16	William L Seigle 900 North Wendover Rd Apt F Charlotte, NC 28211	1913	7/8/20	The McClatchy Company 20-10418	\$	- (S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$	- (T)
17	William L Staples 15849 Muscatel Street Hesperia, CA 92345-3919	1248	6/29/20	The McClatchy Company 20-10418	\$	- (S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$	- (T)
18	William M Lehmberg 14000 Dundewood Road Biloxi, MS 39532	1478	6/29/20	The McClatchy Company 20-10418	\$	- (S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$	- (T)
19	William R Rothermel 844 Robinson Ave Barberton, OH 44203-3725	1773	7/7/20	The McClatchy Company 20-10418	\$	- (S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$	- (T)
20	William R Schuyler PO Box 761 Marina, CA 93933	1857	7/7/20	The McClatchy Company 20-10418	\$	- (S)
					-	(A)
					-	(B)
					-	(P)
					47,677.00	(U)
					\$ 47,677.00	(T)
21	William S Smith 601 Mount Vernon Dr Venice, FL 34293-1117	2229	7/10/20	The McClatchy Company 20-10418	\$	- (S)
					-	(A)
					-	(B)
					2,285.76	(P)
					-	(U)
					\$ 2,285.76	(T)
22	William V Griffin III 1860 Myrick Rd Tallahassee, FL 32303-4336	576	6/12/20	The McClatchy Company 20-10418	\$	- (S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$	- (T)
23	Williams J Mena PO Box 410531 Kansas City, MO 64141-0531	2373	7/16/20	The McClatchy Company 20-10418	\$	- (S)
					10,000.00	(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	
					\$ 10,000.00	(T)
24	Willie G Fuller 1088 Bookford Rd Macon, GA 31210	652	6/15/20	Macon Telegraph Publishing Company 20-10436	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)
25	Willie J Edwards 1105 Calloway Street Tallahassee, FL 32304	1133	6/22/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)
26	Willie Lee Paschal 6226 Joyner Drive Columbus, GA 31907	920	6/10/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)
27	Wilma Seliger 560 Hedstrom Road Turlock, CA 95382	2307	7/13/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)
28	Wing K Lee 43913 S Moray Street Fremont, CA 94539	549	6/11/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)
29	Winston C Cavin 5308 Wood Valley Drive Raleigh, NC 27613	949	6/16/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)
30	Xia Va Xiong 315 N Douglas Fresno, CA 93727	2143	7/10/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)
31	Yvonne H Evridge 2540 Mosley Road Byron, GA 31008-7680	1039	6/22/20	Macon Telegraph Publishing Company 20-10436	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)
32	Zac T Bao 10201 Grosvenor Place Apt 1401 Rockville, MD 20852-4620	496	6/10/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)
33	Zenon Franckowiak 409 E Ellis St Long Beach, CA 90805-4615	721	6/12/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)
34	Zoila Acevedo Assouline Berlowe, P.A. 100 SE 2nd Street, Suite 3105 Miami, FL 33131	1966	7/9/20	Miami Herald Media Company 20-10450	\$ -	(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. 925</u>

**ORDER GRANTING PLAN ADMINISTRATION
TRUSTEE'S EIGHTEENTH 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