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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. 916

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



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 Ninth Omnibus Objection to Claims (No Liability Claims – Pension Claims)* [Docket No. 916] (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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– 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
In re : **Chapter 11**
:
JCK LEGACY COMPANY, *et al.*, : **Case No. 20-10418 (MEW)**
:
Wind-Down Debtors.¹ : **(Jointly Administered)**
:
----- x Related Docket No. 916

**ORDER GRANTING PLAN ADMINISTRATION
TRUSTEE'S NINTH 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	Ina Bowser 4209 Lassiter Mill Rd Unit 222 Raleigh, NC 27609-5797	639	6/14/20	The News & Observer Publishing Co. 20-10464	\$ -	(S) (A) (B) (P) (U) (T)
2	Inez Coles 4178 Wasatch Meadows Dr West Jordan, UT 84088-6373	1192	6/23/20	The McClatchy Company 20-10418	\$ -	(S) (A) (B) (P) (U) (T)
3	Ira Breskin 31 Baker Hill Rd Great Neck, NY 11023	2230	7/10/20	The McClatchy Company 20-10418	\$ -	(S) (A) (B) (P) (U) (T)
4	Irene Tadich 1416 McMillan Avenue A-4 Sumner, WA 98390-2163	1698	7/6/20	The McClatchy Company 20-10418	\$ -	(S) (A) (B) (P) (U) (T)
5	Irina Lallemand 5370 128th Pl Ocala, FL 34473	2043	7/9/20	Miami Herald Media Company 20-10450	\$ -	(S) (A) (B) (P) (U) (T)
6	Iris Carr 2961 Terrace Way #24 Martinez, CA 94553	2154	7/10/20	The McClatchy Company 20-10418	\$ -	(S) (A) (B) (P) (U) (T)
7	Iris Leon 10574 Regal Stallion Ave Las Vegas, NV 89135	1165	6/22/20	The McClatchy Company 20-10418	\$ -	(S) (A) (B) (P) (U) (T)
8	Iris Leon 10574 Regal Stallion Ave Las Vegas, NV 89135	836	6/16/20	The McClatchy Company 20-10418	\$ -	(S) (A) (B) (P) (U) (T)
9	Irma D Navarro 1406 Lodgepole Court Gilroy, CA 95020	2309	7/13/20	The McClatchy Company 20-10418	\$ -	(S) (A) (B) (P) (U) (T)
10	Irvin Bethel, Jr. 1320 Pineland Drive Columbia, SC 29203	2014	7/9/20	The State Media Company 20-10465	\$ -	(S) (A) (B) (P) (U) (T)
11	Isabel Wright 220 Southwestern Dr, Apt 111 Lakewood, NY 14750-2142	1059	6/22/20	The McClatchy Company 20-10418	\$ -	(S) (A) (B) (P) (U) (T)
12	Ivan Jones 265 Buttonwood Dr	1256	6/26/20	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
Key Biscayne, FL 33149-1202					- (B) - (P) - (U) \$ - (T)
13	J G Fallquist 2105 Cardinal Dr Ceres, CA 95307-2403	1191	6/23/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
14	J H Chapman 805 Saadowhill St Norman, OK 73071-7167	1853	7/7/20	Miami Herald Media Company 20-10450	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
15	Jack D Roberts 2216 Squires St Longmont, CO 80501-1414	1141	6/22/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
16	Jack Douglas Jr 3840 Shelby Drive Fort Worth, TX 76109	882	6/16/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
17	Jack E Kelly 8408 N Upper Mayes Lane Spokane, WA 99208-7099	1715	7/6/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
18	Jack L Eikenberry 290 SW 97th Ter Pembroke Pines, FL 33025-1073	829	6/16/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
19	Jack L Smith 209 SW Whitmore Dr Port St Lucie, FL 34984-3654	1270	7/2/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
20	Jack White 1247 Ashwood Ct Lebanon, OR 97355-1239	1264	6/29/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
21	Jacqueline Marlowe 5316 Bonnell Ave Fort Worth, TX 76107	508	6/10/20	Star-Telegram, Inc. 20-10460	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
22	Jaime Lozano 12481 SW 194 ST Miami, FL 33177	1891	7/7/20	Miami Herald Media Company 20-10450	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
23	James Arnold 564 Auburndale Ave Akron, OH 44313	2274	7/12/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P)

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(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	
					180,000.00	(U)
					\$ 180,000.00	(T)
24	James A Fredericks 429 Boothe Lane PO Box 6233 Crestline, CA 92325-6233	1020	6/22/20	The McClatchy Company 20-10418	\$ -	(S) (A) (B) (P) (U) (T)
25	James A Hayward 221 North Pennsylvania Ave Independence, KS 67301	1897	7/6/20	Wichita Eagle and Beacon Publishing Company, Inc. 20-10469	\$ -	(S) (A) (B) (P) (U) (T)
26	James A Souza 2422 #h N Main St Salinas, CA 93906-4259	1909	7/7/20	McClatchy Newspapers, Inc. 20-10444	\$ -	(S) (A) (B) (P) (U) (T)
27	James A Whetter 1101 S. Ellsworth Rd. #239 Mesa, AZ 85208-2927	1114	6/21/20	The McClatchy Company 20-10418	\$ -	(S) (A) (B) (P) (U) (T)
28	James B Brakey 2208 Griffith Terrace Manhattan, KS 66502-4746	2081	7/10/20	Wichita Eagle and Beacon Publishing Company, Inc. 20-10469	\$ 60,000.00	(S) (A) (B) (P) (U) (T)
29	James B. Worsham 4117 Woodbine St. Chevy Chase, MD 20815	458	6/9/20	The McClatchy Company 20-10418	\$ -	(S) (A) (B) (P) (U) (T)
30	James C Eaton 1207 NE 4th Ave Austin, MN 55912	280	6/7/20	The McClatchy Company 20-10418	\$ -	(S) (A) (B) (P) (U) (T)
31	James Delaney 6298 144th Avenue Holland, MI 49423	441	6/9/20	The McClatchy Company 20-10418	\$ -	(S) (A) (B) (P) (U) (T)
32	James E Carr 1474 South Eudora Street Denver, CO 80222	1112	6/21/20	The McClatchy Company 20-10418	\$ -	(S) (A) (B) (P) (U) (T)
33	James E Coverton 1313 Oakland Rd Henrico, VA 23231	2251	7/10/20	The News & Observer Publishing Co. 20-10464	\$ -	(S) (A) (B) (P) (U) (T)
34	James E Phillips 14819 W. 74th Ct Shawnee, KS 66216	2548	8/4/20	The McClatchy Company 20-10418	\$ -	(S) (A) (B) (P)

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EXHIBIT 1
No Liability Claims - Pension Claims

Objectionable Claims

Name/Address of Claimant		Claim #	Filed Date	Debtor/Case #	Claim Amount	
					\$	- (U)
					\$	- (T)
35	James E Plants PO Box 291 Republic, PA 15475-0291	1169	6/23/20	The McClatchy Company 20-10418	\$	- (S)
						- (A)
						- (B)
						- (P)
						- (U)
					\$	- (T)
36	James F Sisley 5604 78th Ave E Palmetto, FL 34221	516	6/11/20	The McClatchy Company 20-10418	\$	- (S)
						- (A)
						- (B)
						- (P)
						- (U)
					\$	- (T)
37	James Goldsborough 4085 Caminito Terviso San Diego, CA 92122-1991	557	6/11/20	The McClatchy Company 20-10418	\$	- (S)
						- (A)
						- (B)
						- (P)
						- (U)
					\$	- (T)
38	James H Frankel 1736 Flagstone Drive Ripon, CA 95366	621	6/13/20	The McClatchy Company 20-10418	\$	- (S)
						- (A)
						- (B)
						- (P)
						- (U)
					\$	- (T)
39	James H Keeble 23310 Coconut Island Drive Apt 201 Estero, FL 34134	479	6/10/20	The McClatchy Company 20-10418	\$	- (S)
						- (A)
						- (B)
					44,712.00	(P)
						- (U)
					\$ 44,712.00	(T)
40	James H Matthews Jr 10808 SE Hobart St Tequesta, FL 33469-1672	1972	7/8/20	The McClatchy Company 20-10418	\$	- (S)
						- (A)
						- (B)
					200,000.00	(P)
						- (U)
					\$ 200,000.00	(T)
41	James J Kilrain 103 Kintzing Ct Marlton, NJ 08053-9603	1432	7/2/20	The McClatchy Company 20-10418	\$	- (S)
						- (A)
						- (B)
						- (P)
						- (U)
					\$	- (T)
42	James K Bohanon II 2102 E B St Belleville, IL 62221-5006	1945	6/24/20	The McClatchy Company 20-10418	\$	- (S)
						- (A)
						- (B)
						- (P)
						- (U)
					\$	- (T)
43	James K Davis 804 NE Adams Drive Lees Summit, MO 64086-4932	2323	7/13/20	The McClatchy Company 20-10418	\$	- (S)
						- (A)
						- (B)
						- (P)
						- (U)
					\$	- (T)
44	James K Wright 26221 SW 133 Place Homestead, FL 33032	2128	7/10/20	The McClatchy Company 20-10418	\$	- (S)
						- (A)
						- (B)
						- (P)
						- (U)
					\$	- (T)
45	James L Kessler 3027 Oak Hill Drive Avon Park, FL 33825-6507	798	6/15/20	The McClatchy Company 20-10418	\$	- (S)
						- (A)
						- (B)
						- (P)
						- (U)
					\$	- (T)

(S) - Secured
(A) - Administrative
(B) - 503(b)(9)
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EXHIBIT 1
No Liability Claims - Pension Claims

Objectionable Claims

	Name/Address of Claimant	Claim #	Filed Date	Debtor/Case #	Claim Amount
46	James M Sparks 2803 Hardscrabble Road Erieville, NY 13061-3252	1071	6/19/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
47	James McCoy Jr 2427 Rob Roy Ct Charlotte, NC 28208	2597	8/26/20	The Charlotte Observer Publishing Company 20-10463	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
48	James P Davis 204 Fishermans Cv Lizella, GA 31052-3325	1434	6/29/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
49	James P Ketsdever 1139 Grandview Dr Martinez, CA 94553	1046	6/18/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
50	James P Spangler 500A Mcpride Ln Brookfield, WI 53045-3671	1310	6/29/20	Wichita Eagle and Beacon Publishing Company, Inc. 20-10469	\$ - (S) - (A) - (B) - (P) 30,292.99 (U) \$ 30,292.99 (T)
51	James Poole 4763 Turnberry Lane Columbus, GA 31909	444	6/9/20	Columbus-Ledger Enquirer, Inc. 20-10424	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
52	James Francis 2214 SE 34th Ave Portland, OR 97214	1655	7/4/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) 175,000.00 (U) \$ 175,000.00 (T)
53	James R Haney Jr. 6467 Bridgewood Road Columbia, SC 29206	673	6/15/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
54	James R Lindsey 109 Great Frontier Drive Georgetown, TX 78633-4595	906	6/17/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
55	James R Price 110 Boulder Lane Chapel Hill, NC 27514	1895	7/7/20	McClatchy Newspapers, Inc. 20-10444	\$ - (S) - (A) - (B) - (P) 42,000.00 (U) \$ 42,000.00 (T)
56	James R Steckel 1906 Ruiz Ct Lady Lake, FL 32159-8590	763	6/15/20	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
57	James Ray Worley 719 Justice Drive Lake Lure, NC 28746	768	6/15/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
58	Jim Finkelstein 5412 S Piccadilly Cir West Bloomfield, MI 48322	1907	7/7/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
59	James S Olichwier 1717 150th Ave St Croix Falls, WI 54024	1085	6/19/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
60	James T Wiley 32 West Madison Durant, MS 39063-3613	1936	7/8/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
61	James W Watson 90 Lee Road #442 Phenix City, AL 36870-8710	724	6/12/20	Columbus-Ledger Enquirer, Inc. 20-10424	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
62	James Wittmeyer 655 Santiago Avenue Half Moon Bay, CA 94019	179	6/4/20	McClatchy U.S.A., Inc. 20-10449	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
63	Jamie T Hufnagel 3616 Wickersham Way Raleigh, NC 27604	2056	7/10/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
64	Jan P Pallares 38 Ladue Estates Dr Creve Coeur, MO 63141	357	6/8/20	McClatchy Newspapers, Inc. 20-10444	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
65	Jane A Dotson 306 Aladar Drive OFallon, IL 62269	1946	7/2/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
66	Jane A Johnson 1168 Old Peachy Canyon Rd Paso Robles, CA 93446	249	6/6/20	San Luis Obispo Tribune, LLC 20-10459	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
67	Jane A. Dotson 306 Aladar Drive OFallon, IL 62269	1612	7/2/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
68	Jane C Kwiatkowski 212 S Catamaran Circle	68	3/24/20	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
Pittsburg, CA 94565				- (B) - (P) - (U) \$ - (T)
69 Jane F Gattone 8 General Wayne Dr Media, PA 19063-4838	1885	7/6/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
70 Jane Graham 10106 N Comanche Dr Spokane, WA 99208	2428	7/20/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
71 Jane M Parrish 2121 Danshire Drive Tallahassee, FL 32308-3811	2509	7/28/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
72 Janet E Hoffman 616 East Allens Lane Philadelphia, PA 19119	861	6/16/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
73 Janet L Plesek 9211 Broadway Merrillville, IN 46410	1671	6/30/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) 32,938.08 (U) \$ 32,938.08 (T)
74 Janice A Gorthy 4311 North Fourth Fresno, CA 93726	2289	7/11/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
75 Janie C Jamieson 565 Lee Rd 550 Phenix City, AL 36870	2091	7/9/20	Columbus-Ledger Enquirer, Inc. 20-10424	\$ - (S) - (A) - (B) 1,000,000.00 (P) - (U) ##### (T)
76 Jasminka Delic 3924 Horizon Pl Fort Worth, TX 76133	892	6/17/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
77 Jason S Coughran 2117 O Street C Sacramento, CA 95816	945	6/18/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) 500,000.00 (P) - (U) \$ 500,000.00 (T)
78 Jay M. Roth 36842 Blanca Avenue Madera, CA 93636	181	6/4/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
79 Jean E Kirby 9024 Warren Dr Mc Kinney, TX 75071-7403	947	6/18/20	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)
80	Jeanne M Huff 6008 W Lubkin Boise, ID 83704	1839	7/7/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
81	Jeanne Marie Minor 4724 McCulloch Street Duluth, MN 55804	2032	7/9/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
82	Jeanne P Matthews-Dickerson 1378 Hackberry Place The Villages, FL 32163-2612	1622	7/3/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
83	Jeff C Bank 26 Pegasus Drive Trabuco Canyon, CA 92679	849	6/16/20	McClatchy U.S.A., Inc. 20-10449	\$ - (S) - (A) - (B) - (P) 50,205.60 (U) \$ 50,205.60 (T)
84	Jeff C Bowman 513 Pine Wood Drive Nicholasville, KY 40356	1984	7/9/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
85	Jeffrey A Deitz 311 Lakewood Dr Waleska, GA 30183-4448	541	6/11/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
86	Jeffrey Charles Bils 419 S. Palm Drive, Apt. 4 Beverly Hills, CA 90212	2204	7/10/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) 6,000.00 (U) \$ 6,000.00 (T)
87	Jeffrey H Burlew 211 N Meridian St Tallahassee, FL 32301-7601	231	6/6/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) 3,000.00 (P) - (U) \$ 3,000.00 (T)
88	Jeffrey R Liles 435 Vista Ct Mount Sterling, KY 40353	680	6/15/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
89	Jeff New 1706 4th Ave N Grand Forks, ND 58203	2272	7/12/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
90	Jeffrey Walsh 518 Butler Street Wyoming, PA 18644	1050	6/18/20	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

Objectable Claims

	Name/Address of Claimant	Claim #	Filed Date	Debtor/Case #	Claim Amount
91	Jennifer L Swindell 1345 E Lone Creek Dr Eagle, ID 83616-4776	1847	7/7/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) 100,000.00 (P) - (U) \$ 100,000.00 (T)
92	Jennifer Small-Jackson 105 Skyway Dr Vallejo, CA 94591-5657	1195	6/22/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) 22,000.00 (P) - (U) \$ 22,000.00 (T)
93	Jennifer Small-Jackson 105 Skyway Vallejo, CA 94591-5657	982	6/18/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) 22,000.00 (P) - (U) \$ 22,000.00 (T)
94	Jesse E Ruiz 4621 E Mineral Rd Phoenix, AZ 85044	842	6/16/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) 380.92 (P) - (U) \$ 380.92 (T)
95	Jesse J Hardin 2317 Timberline Dr Fort Worth, TX 76119	2384	7/15/20	Star-Telegram, Inc. 20-10460	\$ - (S) - (A) - (B) 300,000.00 (P) - (U) \$ 300,000.00 (T)
96	Jesse L Little 3288 Haley Road Lexington, KY 40516	693	6/12/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
97	Jessie Milligan 229 A Street Myrtle Point, OR 97458	488	6/10/20	Star-Telegram, Inc. 20-10460	\$ - (S) - (A) - (B) - (P) - (U) \$ - (T)
98	Jesus F Silvarrey 6357 SW 32nd Street Miami, FL 33155-3036	1786	7/7/20	The McClatchy Company 20-10418	\$ - (S) 78,000.00 (A) - (B) - (P) - (U) \$ 78,000.00 (T)
99	Jesus Moreno 215 Powell Avenue Healdsburg, CA 95448	485	6/10/20	Tribune Newsprint Company 20-10467	\$ - (S) 31,406.85 (A) - (B) - (P) - (U) \$ 31,406.85 (T)
100	Jill C Arnone 444 Wicksworth Lane Saint Louis, MO 63122	1324	6/24/20	McClatchy Newspapers, Inc. 20-10444	\$ - (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. 916</u>

**ORDER GRANTING PLAN ADMINISTRATION
TRUSTEE'S NINTH 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