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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. 1092

**CERTIFICATE OF NO OBJECTION TO PLAN ADMINISTRATION
TRUSTEE'S TWENTY-NINTH OMNIBUS OBJECTION TO CLAIMS
(AMENDED 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 January 15, 2021, the Plan Administration Trustee filed and served the *Plan Administration Trustee’s Twenty-Ninth Omnibus Objection to Claims (Amended Claims)* [Docket No. 1092] (the “**Objection**”) (with supporting documents), together with a Notice of Hearing (the “**Notice**”).

2. The Notice stated, among other things, that responses to the Objection were required to be filed and served so that they were actually received no later than February 10, 2021 at 4:00 p.m. (Prevailing Eastern Time).

3. The undersigned counsel hereby certifies that, as of the date hereof, no response to the Objection 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 Objection 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 Objection.

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
February 12, 2021

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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. 1092**

**ORDER GRANTING PLAN ADMINISTRATION
TRUSTEE'S TWENTY-NINTH OMNIBUS OBJECTION TO CLAIMS
(AMENDED 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 Amended 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 appearing that no

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.

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 February 12, 2021; 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 Amended Claims listed under the heading “*Objectionable Claims*” on **Exhibit 1** attached hereto are hereby disallowed and expunged in their entirety. The holders of the Surviving Claims listed under the heading “*Surviving Claims*” on **Exhibit 1** attached hereto will continue to be the actual or beneficial holders of the Surviving Claims.
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 (i) any of the Amended Claims that are not disallowed and expunged pursuant to this Order and (ii) any of the Surviving Claims, including to seek disallowance and expungement of same, and the rights and defenses of the claimants regarding such claims are fully preserved. Neither the Objection nor this Order shall constitute any admission or finding with respect to the validity or

amount of the Amended Claims that are not disallowed and expunged pursuant to this Order or the Surviving Claims.

5. The claims agent retained in the Debtors' Chapter 11 Cases is authorized to reflect the disallowance and expungement of the Amended 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] __, 2021

HONORABLE MICHAEL E. WILES
UNITED STATES BANKRUPTCY JUDGE

EXHIBIT 1

Amended Claims

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

EXHIBIT 1
Amended Claims

Objectionable Claims					Surviving Claims				
Name/Address of Claimant	Claim #	Filed Date	Debtor/Case #	Claim Amount	Claim #	Filed Date	Debtor/Case #	Claim Amount	
1 ADSSERVE, INC 5325 BALLARD AVE NW, SUITE 300 SEATTLE, WA 98107	2452	7/22/20	The News & Observer Publishing Co. 20-10464	\$ - (S) - (A) - (B) - (P) 98,395.77 (U) 98,395.77 (T)	2458	7/23/20	The News & Observer Publishing Co. 20-10464	\$ - (S) - (A) - (B) - (P) 98,395.77 (U) 98,395.77 (T)	
2 DOW JONES AND CO INC PO BOX 4137 NEW YORK, NY 10261	1126	6/22/20	Macon Telegraph Publishing Company 20-10436	\$ - (S) - (A) - (B) - (P) 1,874.40 (U) 1,874.40 (T)	2015 ^[1]	7/9/20	Macon Telegraph Publishing Company 20-10436	\$ - (S) 937.20 (A) - (B) - (P) 937.20 (U) 1,874.40 (T)	
3 DOW JONES AND CO INC PO BOX 4137 NEW YORK, NY 10261-4137	1491	6/29/20	Tacoma News, Inc. 20-10461	\$ - (S) - (A) - (B) - (P) 3,200.14 (U) 3,200.14 (T)	2005 ^[1]	7/9/20	Tacoma News, Inc. 20-10461	\$ - (S) 1,427.90 (A) - (B) - (P) 1,772.24 (U) 3,200.14 (T)	
4 DOW JONES AND CO INC PO BOX 4137 NEW YORK, NY 10261-4137	1493	6/29/20	Columbus-Ledger Enquirer, Inc. 20-10424	\$ - (S) - (A) - (B) - (P) 84.66 (U) 84.66 (T)	2019 ^[1]	7/9/20	Columbus-Ledger Enquirer, Inc. 20-10424	\$ - (S) 698.94 (A) - (B) - (P) - (U) 698.94 (T)	
5 DOW JONES AND CO INC PO BOX 4137 NEW YORK, NY 10261-4137	1495	6/29/20	Wichita Eagle and Beacon Publishing Company, Ir 20-10469	\$ - (S) - (A) - (B) - (P) 1,069.55 (U) 1,069.55 (T)	2004 ^[1]	7/9/20	Wichita Eagle and Beacon Publishing Company, Ir 20-10469	\$ - (S) 397.32 (A) - (B) - (P) 672.23 (U) 1,069.55 (T)	
6 DOW JONES AND CO INC PO BOX 4137 NEW YORK, NY 10261-4137	1592	7/2/20	McClatchy Newspapers, Inc. 20-10444	\$ - (S) - (A) - (B) - (P) 28,559.19 (U) 28,559.19 (T)	1987 ^[1]	7/9/20	McClatchy Newspapers, Inc. 20-10444	\$ - (S) 12,030.98 (A) - (B) - (P) 16,528.21 (U) 28,559.19 (T)	
7 DOW JONES AND CO INC PO BOX 4137 NEW YORK, NY 10261-4137	1604	7/2/20	Star-Telegram, Inc. 20-10460	\$ - (S) - (A) - (B) - (P) 5,692.52 (U) 5,692.52 (T)	1981 ^[1]	7/9/20	Star-Telegram, Inc. 20-10460	\$ - (S) 3,829.98 (A) - (B) - (P) 1,862.54 (U) 5,692.52 (T)	
8 DOW JONES AND CO INC PO BOX 4137 NEW YORK, NY 10261-4137	1607	7/1/20	Bellingham Herald Publishing, LLC 20-10420	\$ - (S) - (A) - (B) - (P) 3,075.60 (U) 3,075.60 (T)	1999 ^[1]	7/9/20	Bellingham Herald Publishing, LLC 20-10420	\$ - (S) 916.74 (A) - (B) - (P) 2,158.86 (U) 3,075.60 (T)	
9 DOW JONES AND CO INC PO BOX 4137 NEW YORK, NY 10261	1623	7/2/20	Miami Herald Media Company 20-10450	\$ - (S) - (A) - (B) - (P) 2,721,187.22 (U) 2,721,187.22 (T)	1977	7/9/20	Miami Herald Media Company 20-10450	\$ - (S) - (A) - (B) - (P) 2,707,336.46 (U) 2,707,336.46 (T)	
10 DOW JONES AND CO INC PO BOX 4137 NEW YORK, NY 10261	1663	7/2/20	McClatchy Shared Services, Inc. 20-10448	\$ - (S) - (A) - (B) - (P) 5,864.68 (U) 5,864.68 (T)	1982 ^[1]	7/9/20	McClatchy Shared Services, Inc. 20-10448	\$ - (S) 3,081.24 (A) - (B) - (P) 2,783.44 (U) 5,864.68 (T)	
11 Simplifi Holdings, Inc. 128 East Exchange Ave, Suite 700 Fort Worth, TX 76164	2066	7/9/20	McClatchy Interactive West 20-10440	\$ - (S) - (A) - (B) - (P) 527,695.76 (U) 527,695.76 (T)	2126	7/9/20	McClatchy Interactive West 20-10440	\$ - (S) - (A) - (B) - (P) 527,695.76 (U) 527,695.76 (T)	

^[1] This surviving claim was listed as an "objectionable claim" on Exhibit 1 to the *Plan Administration Trustee's Twentieth Omnibus Objection to Claims (No Liability Claims)*, filed on November 17, 2020 [Docket No. 983] (the "**Twentieth Omnibus Objection**"). The Twentieth Omnibus Objection, solely as to this and the other claims notated with [1], was adjourned to January 19, 2021 [Docket No. 1024].

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. 1092</u>

**ORDER GRANTING PLAN ADMINISTRATION
TRUSTEE'S TWENTY-NINTH OMNIBUS OBJECTION TO CLAIMS
(AMENDED 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 Amended 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 appearing that no

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² 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 February 12, 2021; 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 Amended Claims listed under the heading “*Objectionable Claims*” on **Exhibit 1** ~~to the Declaration, annexed to the Objection,~~ attached hereto are hereby disallowed and expunged in their entirety. The holders of the Surviving Claims listed under the heading “*Surviving Claims*” on **Exhibit 1** ~~to the Declaration~~ attached hereto will continue to be the actual or beneficial holders of the Surviving Claims.
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 (i) any of the Amended Claims that are not disallowed and expunged pursuant

to this Order and (ii) any of the Surviving Claims, including to seek disallowance and expungement of same, and the rights and defenses of the claimants regarding such claims are fully preserved. Neither the Objection nor this Order shall constitute any admission or finding with respect to the validity or amount of the Amended Claims that are not disallowed and expunged pursuant to this Order or the Surviving Claims.

5. The claims agent retained in the Debtors' Chapter 11 Cases is authorized to reflect the disallowance and expungement of the Amended 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] __, 2021

HONORABLE MICHAEL E. WILES
UNITED STATES BANKRUPTCY JUDGE