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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 No. 1093

**CERTIFICATE OF NO OBJECTION TO PLAN ADMINISTRATION  
TRUSTEE'S THIRTIETH OMNIBUS OBJECTION TO CLAIMS  
(REDUCED CLAIMS, RECLASSIFIED CLAIMS,  
AND REDUCED AND RECLASSIFIED 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 January 15, 2021, the Plan Administration Trustee filed and served the *Plan Administration Trustee’s Thirtieth Omnibus Objection to Claims (Reduced Claims, Reclassified Claims, and Reduced and Reclassified Claims)* [Docket No. 1093] (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 Plan Administration Trustee received informal responses to the Objection that were resolved after the Plan Administration Trustee and his professionals provided further information related to, and clarification of, the Objection

4. The undersigned counsel hereby certifies that, as of the date hereof, no response to the Objection other than those noted above 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.

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 Objection.

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  
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	
<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	<b>Related Docket No. 1093</b>

**ORDER GRANTING PLAN ADMINISTRATION  
TRUSTEE'S THIRTIETH OMNIBUS OBJECTION TO CLAIMS  
(REDUCED CLAIMS, RECLASSIFIED CLAIMS,  
AND REDUCED AND RECLASSIFIED 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, reducing the asserted amount, reclassifying to general unsecured, or reducing and reclassifying the Disputed 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

<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.

having been given under the particular circumstances; and it 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 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 Reduced Claims listed on **Exhibit 1** attached hereto are hereby reduced to the amounts listed in the column titled “*Reduced Amount*” on **Exhibit 1** attached hereto.
3. The Reclassified Claims listed on **Exhibit 2** attached hereto are hereby reclassified as Class 5 General Unsecured Claims as defined in the Plan.
4. The Reduced and Reclassified Claims listed on **Exhibit 3** attached hereto are hereby reduced to the amounts listed in the column titled “*Reduced Amount*” on **Exhibit 3** attached hereto, and reclassified as Class 5 General Unsecured Claims as defined in the Plan.
5. Each claim and the objections by the Plan Administration Trustee to each claim as identified and set forth on **Exhibits 1-3** 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.

6. The Plan Administration Trustee shall have the right to further object in the future on any ground to any of the Disputed Claims that are not reduced in amount, reclassified as general unsecured, or reduced and reclassified pursuant to this Order, 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, basis for, or amount of the Disputed Claims that are not reduced and/or reclassified pursuant to this Order.

7. The claims agent retained in the Debtors' Chapter 11 Cases is authorized to reflect the reduction in amount and/or reclassification to general unsecured claim of the Disputed Claims on the official claims register maintained for the Debtors' cases.

8. The terms and conditions of this Order are effective immediately upon entry.

9. 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

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HONORABLE MICHAEL E. WILES  
UNITED STATES BANKRUPTCY JUDGE

**EXHIBIT 1**

**Reduced Claims**



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

**EXHIBIT 1**  
**Reduced Claims**

**Objectionable Claims**

Name/Address of Claimant		Claim #	Filed Date	Debtor/Case #	Claim Amount	Reduced Amount
1 Simplifi Holdings, Inc. 128 E Exchange Avenue, Suite 700 Fort Worth, TX 76164		2126	7/9/20	McClatchy Interactive West 20-10440	\$ - (S)	\$ - (S)
					- (A)	- (A)
					- (B)	- (B)
					- (P)	- (P)
					527,695.76 (U)	1,576.97 (U)
					\$ 527,695.76 (T)	\$ 1,576.97 (T)
2 Urban Olympia 6 LLC 155 NE 100th St., Suite 205 Seattle, WA 98125		113	4/15/20	Olympian Publishing, LLC 20-10455	\$ - (S)	\$ - (S)
					- (A)	- (A)
					- (B)	- (B)
					- (P)	- (P)
					1,080,225.04 (U)	219,032.48 (U)
					\$ 1,080,225.04 (T)	\$ 219,032.48 (T)
3 CHERRY STREET PROPERTIES, LLC 487 CHERRY ST STE 400 MACON, GA 31201		2238	7/10/20	Macon Telegraph Publishing Company 20-10436	\$ - (S)	\$ - (S)
					- (A)	- (A)
					- (B)	- (B)
					- (P)	- (P)
					360,118.63 (U)	299,442.63 (U)
					\$ 360,118.63 (T)	\$ 299,442.63 (T)
4 CHIQUITA BRANDS L.L.C. 1855 GRIFFIN ROAD, SUITE C-436 FORT LAUDERDALE, FL 33004		2650	10/7/20	The McClatchy Company 20-10418	\$ 402,549.00 (S)	\$ - (S)
					- (A)	- (A)
					- (B)	- (B)
					- (P)	- (P)
					1,409,732.41 (U)	1,409,732.41 (U)
					\$ 1,812,281.41 (T)	\$ 1,409,732.41 (T)
5 The Travelers Indemnity Company and Its Property Casualty Insurance Affiliates One Tower Square 0000-FP15 Hartford, CT 06183		1941	7/7/20	The McClatchy Company 20-10418	\$ 61,000.00 (S)	\$ - (S)
					UNLIQUIDATED (A)	(A)
					- (B)	- (B)
					- (P)	- (P)
					UNLIQUIDATED (U)	(U)
					\$ 61,000.00 (T)	UNLIQUIDATED (T)
6 Voltari Real Estate Holding LLC c/o Brown Rudnick LLP One Financial Center Boston, MA 02111		2640	9/29/20	The McClatchy Company 20-10418	\$ 403,250.01 (S)	\$ - (S)
					- (A)	- (A)
					- (B)	- (B)
					- (P)	- (P)
					4,917,741.47 (U)	4,917,741.47 (U)
					\$ 5,320,991.48 (T)	\$ 4,917,741.47 (T)

**EXHIBIT 2**

**Reclassified Claims**

**EXHIBIT 2**  
**Reclassified Claims**

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

**Objectionable Claims**

	Name/Address of Claimant	Claim #	Filed Date	Debtor/Case #	Claim Amount	
1	Adorama Inc 42 West 18th Street New York, NY 10011	126	4/27/20	McClatchy Shared Services, Inc. 20-10448	\$ -	(S)
					35,494.08	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ 35,494.08	(T)
2	APPNEXIO 1024 IRON POINT ROAD FOLSOM, CA 95630-8013	2390	7/14/20	McClatchy Shared Services, Inc. 20-10448	\$ -	(S)
					-	(A)
					2,000.00	(B)
					-	(P)
					-	(U)
					\$ 2,000.00	(T)
3	BellSouth Telecommunications, Inc. One ATT Way, Suite 3A104 Bedminster, NJ 07921	2565	8/10/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					553.05	(B)
					-	(P)
					-	(U)
					\$ 553.05	(T)
4	CENTRAL PAGE PACK INC PO BOX 304 SPRINGVILLE, IA 52336	963	6/17/20	The State Media Company 20-10465	\$ -	(S)
					-	(A)
					2,720.00	(B)
					-	(P)
					-	(U)
					\$ 2,720.00	(T)
5	CITYSPARK, INC 1737 E IMPERIAL PARK SQ SALT LAKE CITY, UT 84106	343	6/8/20	McClatchy Shared Services, Inc. 20-10448	\$ -	(S)
					-	(A)
					165.52	(B)
					-	(P)
					-	(U)
					\$ 165.52	(T)
6	Curtis Heath 1247 Normandy Road Macon, GA 31210	2279	7/9/20	McClatchy Newspapers, Inc. 20-10444	\$ -	(S)
					-	(A)
					-	(B)
					9,434.25	(P)
					-	(U)
					\$ 9,434.25	(T)
7	Dow Jones and Co Inc 4300 Rt. 1 N So Brunswick, NJ 08643	1980	7/9/20	Miami Herald Media Company 20-10450	\$ -	(S)
					-	(A)
					2,712,232.41	(B)
					-	(P)
					8,954.81	(U)
					\$ 2,721,187.22	(T)
8	Elite Resources, Inc PO Box 410302 Charlotte, NC 28241	158	5/19/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					2,007.84	(B)
					-	(P)
					-	(U)
					\$ 2,007.84	(T)
9	Eugene Scalia, Secretary of Labor, United States Department of US Dept of Labor, EBSA 90 7th St., Ste. 11-300 San Francisco, CA 94103	1825	7/6/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)
10	INTELLIGENT AUDIENCE DEVELOPMENT, LLC PO BOX 73515 PUYALLUP, WA 98373	1040	6/22/20	Idaho Statesman Publishing, LLC 20-10431	\$ -	(S)
					-	(A)
					-	(B)
					2,775.00	(P)
					-	(U)
					\$ 2,775.00	(T)
11	Katherine M. Hinson 495 N Paraham Rd Clover, SC 29710-9133	551	6/11/20	McClatchy Newspapers, Inc. 20-10444	\$ -	(S)
					UNLIQUIDATED	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ -	(T)
12	Kent Digital, Inc. 1060 Woodcock Rd. Ste 128 #82956 Orlando, FL 33458	106	4/13/20	Aboard Publishing, Inc. 20-10419	\$ -	(S)
					-	(A)
					408.83	(B)
					-	(P)
					-	(U)
					\$ 408.83	(T)
13	KOH, ELIZABETH	785	6/15/20	Miami Herald Media Company	\$ -	(S)

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

**EXHIBIT 2**  
**Reclassified Claims**

					<b>Objectable Claims</b>	
<b>Name/Address of Claimant</b>		<b>Claim #</b>	<b>Filed Date</b>	<b>Debtor/Case #</b>	<b>Claim Amount</b>	
16104 PROMONTORY PLACE LA MIRADA, CA 90638				20-10450	-	(A)
					-	(B)
					605.03	(P)
					200.00	(U)
					\$ 805.03	(T)
14	LEGALNOTICE ORG 9901 BELWARD CAMPUS DRIVE, SUITE 175 ROCKVILLE, MD 20850	2184	7/9/20	The Charlotte Observer Publishing Company 20-10463	\$ -	(S)
					-	(A)
					29.67	(B)
					-	(P)
					120.33	(U)
					\$ 150.00	(T)
15	LEGALNOTICE ORG 9901 BELWARD CAMPUS DRIVE, SUITE 175 ROCKVILLE, MD 20850	2185	7/9/20	Bellingham Herald Publishing, LLC 20-10420	\$ -	(S)
					-	(A)
					150.00	(B)
					-	(P)
					-	(U)
					\$ 150.00	(T)
16	LEGALNOTICE ORG 9901 BELWARD CAMPUS DRIVE, SUITE 175 ROCKVILLE, MD 20850	2186	7/9/20	Columbus-Ledger Enquirer, Inc. 20-10424	\$ -	(S)
					-	(A)
					220.88	(B)
					-	(P)
					-	(U)
					\$ 220.88	(T)
17	LEGALNOTICE ORG 9901 BELWARD CAMPUS DRIVE, SUITE 175 ROCKVILLE, MD 20850	2187	7/9/20	Idaho Statesman Publishing, LLC 20-10431	\$ -	(S)
					-	(A)
					10.00	(B)
					-	(P)
					-	(U)
					\$ 10.00	(T)
18	LEGALNOTICE ORG 9901 BELWARD CAMPUS DRIVE, SUITE 175 ROCKVILLE, MD 20850	2188	7/9/20	Lexington H-L Services, Inc. 20-10435	\$ -	(S)
					-	(A)
					220.88	(B)
					-	(P)
					-	(U)
					\$ 220.88	(T)
19	LEGALNOTICE ORG 9901 BELWARD CAMPUS DRIVE, SUITE 175 ROCKVILLE, MD 20850	2189	7/9/20	The News & Observer Publishing Co. 20-10464	\$ -	(S)
					-	(A)
					184.62	(B)
					-	(P)
					-	(U)
					\$ 184.62	(T)
20	LEGALNOTICE ORG 9901 BELWARD CAMPUS DRIVE, SUITE 175 ROCKVILLE, MD 20850	2190	7/9/20	Tacoma News, Inc. 20-10461	\$ -	(S)
					-	(A)
					150.00	(B)
					-	(P)
					-	(U)
					\$ 150.00	(T)
21	LEGALNOTICE ORG 9901 BELWARD CAMPUS DRIVE, SUITE 175 ROCKVILLE, MD 20850	2191	7/9/20	Olympian Publishing, LLC 20-10455	\$ -	(S)
					-	(A)
					220.88	(B)
					-	(P)
					-	(U)
					\$ 220.88	(T)
22	LEGALNOTICE ORG 9001 BELWARD CAMPUS DR, SUITE 175 ROCKVILLE, MD 20850	2211	7/9/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					1,637.26	(B)
					-	(P)
					-	(U)
					\$ 1,637.26	(T)
23	LEGALNOTICE ORG 9901 BELWARD CAMPUS DRIVE, SUITE 175 ROCKVILLE, MD 20850	2213	7/9/20	Star-Telegram, Inc. 20-10460	\$ -	(S)
					-	(A)
					150.00	(B)
					-	(P)
					-	(U)
					\$ 150.00	(T)
24	LEGALNOTICE ORG 9901 BELWARD CAMPUS DRIVE, SUITE 175 ROCKVILLE, MD 20850	2214	7/9/20	The State Media Company 20-10465	\$ -	(S)
					-	(A)
					70.88	(B)
					-	(P)
					-	(U)
					\$ 70.88	(T)
25	LEGALNOTICE ORG 9901 BELWARD CAMPUS DRIVE, SUITE 175	2215	7/9/20	Wichita Eagle and Beacon Publishing Company, Ir 20-10469	\$ -	(S)
					-	(A)

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

**EXHIBIT 2**  
**Reclassified Claims**

					<b>Objectable Claims</b>	
<b>Name/Address of Claimant</b>		<b>Claim #</b>	<b>Filed Date</b>	<b>Debtor/Case #</b>	<b>Claim Amount</b>	
ROCKVILLE, MD 20850					150.00	(B)
					-	(P)
					-	(U)
					\$ 150.00	(T)
26	LEGALNOTICE.ORG 9901 BELWARD CAMPUS DRIVE, SUITE 175 ROCKVILLE, MD 20850	2216	7/9/20	Cypress Media, LLC 20-10425	\$ -	(S)
					-	(A)
					150.00	(B)
					-	(P)
					-	(U)
					\$ 150.00	(T)
27	LEGALNOTICE.ORG 9901 BELWARD CAMPUS DRIVE SUITE 175 ROCKVILLE, MD 20850-4085	1204	6/22/20	The Bradenton Herald, Inc. 20-10462	\$ -	(S)
					-	(A)
					220.88	(B)
					-	(P)
					-	(U)
					\$ 220.88	(T)
28	Localogy 901 Wilshire Dr Suite 485 Troy, MI 48084	100	4/7/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					871.00	(B)
					-	(P)
					-	(U)
					\$ 871.00	(T)
29	Managed Energy Systems LLC 11301 Nall Avenue Suite 210 Leawood, KS 66211	1408	6/26/20	Cypress Media, LLC 20-10425	\$ -	(S)
					-	(A)
					5,219.72	(B)
					-	(P)
					-	(U)
					\$ 5,219.72	(T)
30	Martin A. Rubin IRA 4118 Manchester Lake Dr Wellington, FL 33449	1179	6/23/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					40,000.00	(P)
					-	(U)
					\$ 40,000.00	(T)
31	MP4 3622 Horsehead Bay Dr Gig Harbor, WA 98335	359	6/8/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					-	(B)
					3,025.00	(P)
					2,379.01	(U)
					\$ 5,404.01	(T)
32	Neil Walter Company LLC PO Box 2181 Tacoma, WA 98401	143	5/12/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					1,441.85	(B)
					-	(P)
					-	(U)
					\$ 1,441.85	(T)
33	PRINTING AND PACKAGING TECH INC 2003 PERIMETER ROAD UNIT B GREENVILLE, SC 29605	452	6/9/20	The State Media Company 20-10465	\$ -	(S)
					-	(A)
					420.37	(B)
					-	(P)
					-	(U)
					\$ 420.37	(T)
34	Professional Print and Mail, Inc. 2818 E Hamilton Ave Fresno, CA 93721	136	5/5/20	The McClatchy Company 20-10418	\$ -	(S)
					-	(A)
					806.00	(B)
					-	(P)
					-	(U)
					\$ 806.00	(T)
35	Public Service Company of North Carolina Incorporated dba D 220 Operation Way, Mail Code C222 Cayce, SC 29033	1602	7/2/20	The News & Observer Publishing Co. 20-10464	\$ -	(S)
					-	(A)
					5,428.98	(B)
					-	(P)
					5,648.72	(U)
					\$ 11,077.70	(T)
36	Robert G. Dulla & Beth R. Davis Dulla 2544 Willow Way Carmichael, CA 95608	2655	10/9/20	The McClatchy Company 20-10418	\$ 88,000.00	(S)
					-	(A)
					-	(B)
					-	(P)
					-	(U)
					\$ 88,000.00	(T)
37	SACHS, RANDY 3145 ROCKWELL LANE FORT WORTH, TX 76179	399	6/8/20	Star-Telegram, Inc. 20-10460	\$ -	(S)
					-	(A)
					125.00	(B)

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

**EXHIBIT 2**  
**Reclassified Claims**

Objectionable Claims				
Name/Address of Claimant	Claim #	Filed Date	Debtor/Case #	Claim Amount
				- (P)
				- (U)
				\$ 125.00 (T)
38 Sacramento Regional Transit District 1400 29th Street Sacramento, CA 95816	2164	7/10/20	McClatchy Newspapers, Inc. 20-10444	\$ - (S)
				- (A)
				1,400.00 (B)
				- (P)
				- (U)
				\$ 1,400.00 (T)
39 Santa Maria Times, Inc. 3200 Skyway Drive Santa Maria, CA 93455	1737	7/6/20	San Luis Obispo Tribune, LLC 20-10459	\$ - (S)
				- (A)
				31,575.04 (B)
				- (P)
				- (U)
				\$ 31,575.04 (T)
40 SCG Perimeter Woods, L.P. 6400 Powers Ferry Road NW #400 Atlanta, GA 30339	2595	8/26/20	The Charlotte Observer Publishing Company 20-10463	\$ - (S)
				18,829.00 (A)
				- (B)
				- (P)
				112,915.26 (U)
				\$ 131,744.26 (T)
41 Terrys Home and Garden 6200 New Missouri Ave. Centreville, IL 62207	491	6/10/20	Cypress Media, LLC 20-10425	\$ - (S)
				- (A)
				1,965.00 (B)
				- (P)
				- (U)
				\$ 1,965.00 (T)
42 TREASURE VALLEY COFFEE INC 11875 W PRESIDENT DR BOISE, ID 83713	1406	6/29/20	Idaho Statesman Publishing, LLC 20-10431	\$ - (S)
				- (A)
				194.46 (B)
				- (P)
				- (U)
				\$ 194.46 (T)
43 TROY GARAGE DOOR 9935 HWY 40 ST JACOB, IL 62281	874	6/16/20	The McClatchy Company 20-10418	\$ 400.00 (S)
				- (A)
				- (B)
				- (P)
				358.29 (U)
				\$ 758.29 (T)
44 TRUJILLO, THEREASA 3703 W CHESTNUT AVE YAKIMA, WA 98902	1424	6/29/20	The McClatchy Company 20-10418	\$ - (S)
				- (A)
				- (B)
				- (P)
				- (U)
				\$ - (T)
45 VISION COMMUNICATIONS KS 1235 SOUTH MEAD WICHITA, KS 67211-3321	408	6/9/20	Cypress Media, LLC 20-10425	\$ - (S)
				- (A)
				1,265.85 (B)
				- (P)
				- (U)
				\$ 1,265.85 (T)

**EXHIBIT 3**

**Reduced and Reclassified Claims**

**EXHIBIT 3**  
**Reduced and Reclassified Claims**

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

						<b>Objectionable Claims</b>	
	<b>Name/Address of Claimant</b>	<b>Claim #</b>	<b>Filed Date</b>	<b>Debtor/Case #</b>	<b>Claim Amount</b>	<b>Reduced Amount</b>	
1	3500 Doral, MRP, LLC 902 Clint Moore Rd, Suite 104 Boca Raton, FL 33487	2222	7/10/20	Miami Herald Media Company 20-10450	\$ - (S) 80,617.00 (A) - (B) - (P) - (U) \$ 80,617.00 (T)	\$ - (S) - (A) - (B) - (P) 29,800.08 (U) \$ 29,800.08 (T)	
2	914 MYRTLE BEACH, MRP, LLC 902 CLINT MOORE ROAD SUITE 104 BOCA RATON, FL 33487	2224	7/10/20	The Sun Publishing Company, Inc. 20-10466	\$ - (S) 12,586.00 (A) - (B) - (P) - (U) \$ 12,586.00 (T)	\$ - (S) - (A) - (B) - (P) 5,463.11 (U) \$ 5,463.11 (T)	
3	111 W. Hargett, MRP, LLC 902 Clint Moore Rd, Suite 104 Boca Raton, FL 33487	2226	7/10/20	The News & Observer Publishing Co. 20-10464	\$ - (S) 12,089.00 (A) - (B) - (P) - (U) \$ 12,089.00 (T)	\$ - (S) - (A) - (B) - (P) 4,872.48 (U) \$ 4,872.48 (T)	
4	205 Gulfport, MRP, LLC 902 Clint Moore Rd, Suite 104 Boca Raton, FL 33487	2261	7/10/20	Gulf Publishing Company, Inc. 20-10428	\$ - (S) 23,177.00 (A) - (B) - (P) - (U) \$ 23,177.00 (T)	\$ - (S) - (A) - (B) - (P) 11,199.72 (U) \$ 11,199.72 (T)	
5	132 ROCK HILL MRP LLC 902 CLINT MOORE ROAD SUITE 104 BOCA RATON, FL 33487	2628	9/17/20	East Coast Newspapers, Inc. 20-10426	\$ - (S) 19,885.00 (A) - (B) - (P) - (U) \$ 19,885.00 (T)	\$ - (S) - (A) - (B) - (P) 898.83 (U) \$ 898.83 (T)	



**EXHIBIT B**

**Blacklined Proposed Order**

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

-----	X	
<i>In re</i>	:	<b>Chapter 11</b>
	:	
JCK LEGACY COMPANY, <i>et al.</i> ,	:	<b>Case No. 20-10418 (MEW)</b>
	:	
Wind-Down Debtors. <sup>1</sup>	:	<b>(Jointly Administered)</b>
	:	
-----	X	<a href="#"><u>Related Docket No. 1093</u></a>

**ORDER GRANTING PLAN ADMINISTRATION  
TRUSTEE'S THIRTIETH OMNIBUS OBJECTION TO CLAIMS  
(REDUCED CLAIMS, RECLASSIFIED CLAIMS,  
AND REDUCED AND RECLASSIFIED 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, reducing the asserted amount, reclassifying to general unsecured, or reducing and reclassifying the Disputed 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

<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. (5UZI). 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.

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 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 Reduced Claims listed on **Exhibit 1** ~~to the Declaration~~ attached hereto are hereby reduced to the amounts listed in the column titled “*Reduced Amount*” on **Exhibit 1** ~~to the Declaration~~ attached hereto.
3. The Reclassified Claims listed on **Exhibit 2** ~~to the Declaration~~ attached hereto are hereby reclassified as Class 5 General Unsecured Claims as defined in the Plan.
4. The Reduced and Reclassified Claims listed on **Exhibit 3** ~~to the Declaration~~ attached hereto are hereby reduced to the amounts listed in the column titled “*Reduced Amount*” on **Exhibit 3** ~~to the Declaration~~ attached hereto, and reclassified as Class 5 General Unsecured Claims as defined in the Plan.
5. Each claim and the objections by the Plan Administration Trustee to each claim as identified and set forth on **Exhibits 1-3** ~~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.

6. The Plan Administration Trustee shall have the right to further object in the future on any ground to any of the Disputed Claims that are not reduced in amount, reclassified as general unsecured, or reduced and reclassified pursuant to this Order, 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, basis for, or amount of the Disputed Claims that are not reduced and/or reclassified pursuant to this Order.

7. The claims agent retained in the Debtors' Chapter 11 Cases is authorized to reflect the reduction in amount and/or reclassification to general unsecured claim of the Disputed Claims on the official claims register maintained for the Debtors' cases.

8. The terms and conditions of this Order are effective immediately upon entry.

9. 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

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HONORABLE MICHAEL E. WILES  
UNITED STATES BANKRUPTCY JUDGE