

Response Deadline: November 10, 2021 at 4:00 p.m. (Prevailing Eastern Time)
Hearing Date and Time: November 17, 2021 at 11:00 a.m. (Prevailing Eastern Time)

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Counsel for GUC Recovery Trustee

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

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In re:	:	Chapter 11
	:	
JCK LEGACY COMPANY, <i>et al.</i> ,	:	Case No. 20-10418 (MEW)
	:	
Debtors. ¹	:	(Jointly Administered)
	:	
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**GUC RECOVERY TRUSTEE'S SEVENTH OMNIBUS
OBJECTION TO AMENDED/SUPERSEDED SCHEDULED CLAIMS**

THIS SEVENTH OMNIBUS OBJECTION SEEKS TO DISALLOW AND EXPUNGE AMENDED/SUPERSEDED SCHEDULED CLAIMS. PARTIES RECEIVING THIS OBJECTION SHOULD REVIEW THE OMNIBUS OBJECTION AND SCHEDULES 1 AND 2 ATTACHED TO THE BRANDT DECLARATION TO DETERMINE WHETHER THE OMNIBUS OBJECTION AFFECTS THEIR CLAIM(S).

William A. Brandt, Jr. in his capacity as trustee (the "**GUC Recovery Trustee**") of the GUC Recovery Trust created under the GUC Recovery Trust Agreement (the "**Trust Agreement**") and the confirmed *First Amended Joint Chapter 11 Plan of Distribution of JCK Legacy Company and its affiliated Debtors and Debtors in Possession* (the "**Plan**") [Docket No.

¹ The Debtors in these chapter 11 cases and the last four characters of each 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 GUC Recovery Trustee's service address for purposes of these chapter 11 cases is: 110 East 42 Street, Suite 1818 New York, NY 10017.



879], by and through undersigned counsel, files this seventh omnibus objection (the “**GUC Recovery Trustee’s Seventh Omnibus Objection**”), and pursuant to section 502 of title 11 of the United States Code (the “**Bankruptcy Code**”) and Rule 3007 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rule**”), seeks entry of an order (the “**Proposed Order**”) substantially in the form attached as **Exhibit B**:

- (a) disallowing and expunging the scheduled claims identified on Schedule 1 to the Brandt Declaration (the “**Schedule 1 Claims**”).
- (b) disallowing and expunging the scheduled claims identified on Schedule 2 to the Brandt Declaration (the “**Schedule 2 Claims**”).

In support of the GUC Recovery Trustee’s Seventh Omnibus Objection, the GUC Recovery Trustee submits the *Declaration of William A. Brandt, Jr.* (the “**Brandt Declaration**”) attached as **Exhibit A** and represents as follows:

JURISDICTION AND VENUE

- 1. This Court has jurisdiction over this matter under 28 U.S.C. §§ 157 and 1334.
- 2. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b).
- 3. Venue is proper in this district under 28 U.S.C. §§ 1408 and 1409.
- 4. The predicates for the relief sought herein are section 502 of the Bankruptcy Code and Bankruptcy Rule 3007.

BACKGROUND

5. On February 13, 2020 (the “**Petition Date**”), The McClatchy Company, a corporation organized under the laws of the state of Delaware, and certain of its affiliates (the “**Debtors**”), filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. The chapter 11 cases have been jointly administered for procedural purposes, and some cases remain pending.

6. On May 21, 2020, the Bankruptcy Court entered an *Order Establishing Bar Dates for Filing Proofs of Claim and Approving Form and Manner of Notice Thereof* (the “**Bar Date Order**”) [Docket No. 485], and set July 10, 2020, at 5:00 p.m. (E.T.) (the “**General Bar Date**”), as the deadline for creditors to file proofs of claim against the Debtors.

7. Notice of the Bar Date Order was mailed and also published in *The New York Times* as required by the Bar Date Order. *See* Docket Nos. 485, 513.

8. On September 25, 2020, the Bankruptcy Court entered an order (the “**Confirmation Order**”) confirming the Plan, which became effective on September 30, 2020 (the “**Effective Date**”).

9. The Plan and Confirmation Order provide for the establishment of the GUC Recovery Trust pursuant to the Trust Agreement on the Effective Date, at which time the GUC Recovery Trustee was appointed to administer the GUC Recovery Trust. Confirmation Order at 11, 42; Trust Agreement, § 2.1; Plan, § 6.20.

10. Under the Trust Agreement, the GUC Recovery Trustee is authorized to review, object to, settle and resolve all general unsecured claims filed against the Debtors’ estates. Trust Agreement, § 6.1. The GUC Recovery Trustee is also authorized to represent the Debtors’ estate before any court of competent jurisdiction on matters concerning the GUC Recovery Trust, *id.* at § 2.2(m), to enter into any agreement that is consistent with the Plan, Confirmation Order and the GUC Recovery Trust, *id.* at § 2.2(u), and to take any action that is reasonably necessary to administer the GUC Recovery Trust and the Plan. *Id.* at § 2.2(aa).

11. The purpose of the GUC Recovery Trustee’s Seventh Omnibus Objection (and of the companion GUC Recovery Trustee’s Sixth Omnibus Objection) is to confirm the GUC Recovery Trustee’s understanding that Schedule 1 Claims and Schedule 2 Claims have been

amended or superseded by a proof of claim and to give fair notice and an opportunity to be heard to the creditors identified on those schedules.

12. Bankruptcy Rule 3003(c)(4) states that a proof of claim supersedes the scheduling of the claim. The GUC Recovery Trustee is also authorized to adjust the claims register without court approval. In particular, section 6.4 of The Trust Agreement provides:

Any Claim in Class 3 or 5 that has been paid, satisfied, or superseded may be expunged on the Claims Register by the GUC Recovery Trustee . . . and any Claim in Class 3 or 5 that has been amended may be adjusted thereon by the GUC Recovery Trustee without a Claims objection having to be filed and without any further notice to or action, Order, or approval of the Bankruptcy Court.

Trust Agreement, § 6.4.

13. In situations where the same creditor has both a scheduled claim and a proof of claim against the same debtor and in the same amount, or where the proof of claim is for a larger amount than a scheduled claim, the GUC Recovery Trustee believes that the Bankruptcy Rules and the Trust Agreement empower him to allow just one claim for that creditor.

14. In other situations, however, where the scheduled claim and proof of claim are against different debtors (although perhaps mistakenly so), or where the scheduled claim is larger than the proof of claim, the right answer is not so self-evident that it is prudent for the GUC Recovery Trustee to proceed on his own. Thus, notwithstanding Bankruptcy Rule 3003(c)(4) and the broad authority to adjust the claims register, the GUC Recovery Trustee believes it prudent to seek this Court's approval to disallow and expunge: (a) Schedule 1 Claims, which are scheduled claims with higher dollar amounts that apparently were amended or superseded by a proof of claim filed by the same creditor against a different debtor and with a lower dollar amount, and (b) Schedule 2 Claims, which are scheduled claims that apparently were amended or superseded by proofs of claim with different amounts and different debtors.

15. As described in the companion GUC Recovery Trustee's Sixth Omnibus Objection, the GUC Recovery Trustee believes that the scheduled claims and proofs of claim listed on Schedule 1 Claims are based on the same obligation notwithstanding that they involve different debtors. With respect to scheduled claims listed on Schedule 2 Claims, the GUC Recovery Trustee believes that they have been amended or superseded because they are subsumed by the same obligation owed to the same debtor entity identified in both the schedules and the proofs of claim.

RELIEF REQUESTED

16. Pursuant to section 502 of the Bankruptcy Code and Bankruptcy Rule 3007, the GUC Recovery Trustee seeks entry of the Proposed Order disallowing and expunging Schedule 1 Claims and Schedule 2 Claims because they were amended or superseded by a proof of claim.

BASIS FOR RELIEF

17. Section 502 of the Bankruptcy Code governs the allowance and disallowance of claims. 11 U.S.C. § 502. Generally, a proof of claim filed is deemed allowed, unless a party objects. 11 U.S.C. § 502(a). Absent an objection, a properly executed and filed proof of claim constitutes *prima facie* evidence of the validity and amount of the claim. *In re Metex Mfg. Corp.*, 510 B.R. 735, 740 (Bankr. S.D.N.Y. 2014) (citing Fed. R. Bankr. P. 3001(f)). If an objection is filed, however, the objecting party has the initial "burden of putting forth evidence sufficient to refute the validity of the claim." *Metex*, 510 B.R. at 740 (citation omitted). "By producing 'evidence equal in force to the *prima facie* case,' an objector can negate a claim's presumptive legal validity, thereby shifting the burden back to the claimant to 'prove by a preponderance of the evidence that under applicable law the claim should be allowed.'" *In re Residential Capital, LLC.*, 518 B.R. 720, 731 (Bankr. S.D.N.Y. 2014) (quoting *In re Motors Liquidation Co.*, 2013 WL 5549643, at *3 (S.D.N.Y. 2013)).

18. Bankruptcy Rule 3007, which governs objections to claims, further provides that “objections to more than one claim may be joined in an omnibus objection” if “the objections are based solely on the grounds that claims should be disallowed.” Fed. R. Bankr. P. 3007(a). An omnibus objection may include claims that have been amended or superseded by subsequently filed claims. Fed R. Bankr. P. 3007(d)(3).

Amended/Superseded Scheduled Claims

19. The GUC Recovery Trustee has determined that Schedule 1 Claims and Schedule 2 Claims should be disallowed and expunged because they have been amended or superseded by a proof of claim.

20. Prior to making this determination, the GUC Recovery Trustee, with the assistance of the undersigned counsel, reviewed all remaining scheduled claims which had not reconciled and determined that it was not necessary to obtain court approval to adjust the claims register for: (a) scheduled claims that have been amended or superseded by a proof of claim against the same debtor in the same amount; (b) scheduled claims with lower dollar amounts that have been amended or superseded by a proof of claim with higher dollar amounts against the same debtor; and (c) scheduled claims where the creditor received a cure payment or similar treatment. It was apparent from the claims register that these scheduled claims had been amended or superseded by a proof of claim and therefore those scheduled claims have been expunged. A list of the expunged scheduled claims is attached as Exhibit C to the companion GUC Recovery Trustee’s Sixth Omnibus Objection. *See* Docket. No. 1278.

21. However, with respect to scheduled claims with higher dollar amounts that have been amended or superseded by proofs of claim with lower dollar amounts (*i.e.*, Schedule 1 Claims) and scheduled claims that have been amended or superseded by proofs of claim with

different amounts and different debtors (*i.e.*, Schedule 2 Claims), the GUC Recovery Trustee believes it prudent to obtain court approval to ensure that the affected creditors are appropriately noticed and given an opportunity to respond to the proposed adjustment of their scheduled claims.

22. In sum, this objection seeks to confirm the GUC Recovery Trustee's understanding with respect to Schedule 1 Claims and Schedule 2 Claims which have been amended or superseded by a proof of claim. Accordingly, the GUC Recovery Trustee respectfully requests that the creditors' claims be limited to their proofs of claim, and that the scheduled claims be disallowed and expunged (as noted above in some cases that will mean the creditor will have no remaining claim).

RESPONSES TO GUC RECOVERY TRUSTEE'S SEVENTH OMNIBUS OBJECTION

23. To contest an objection, a claimant must file and serve a written response to this GUC Recovery Trustee's Seventh Omnibus Objection so that it is received no later than November 10, 2021 at 4:00 p.m. (Eastern Time) (the "**Response Deadline**"). Each response must be filed and served upon movant, each counsel to the Plan Administration Trustee, the United States Trustee, the Debtors and all parties that have requested or that are required to receive notice pursuant to Bankruptcy Rule 2002.

24. Any response must: (a) be in writing; (a) conform to the applicable Bankruptcy Rules and Local Bankruptcy Rules; (c) state the name and address of the claimant and description of the basis for the amount of the claim; (d) include a concise statement for the reason why the claim should not be disallowed and expunged for the reasons set forth in the GUC Recovery Trustee's Seventh Omnibus Objection, including, but not limited to, the specific factual and legal bases upon which the claimant will rely in opposing the GUC Recovery Trustee's Seventh Omnibus Objection; (d) include all documentation or other evidence of the claim, to the extent not

included with the proof of claim previously filed with the Bankruptcy Court, upon which the claimant will rely in opposing the GUC Recovery Trustee's Seventh Omnibus Objection at any hearing; and (e) the name, address, and telephone number of the person (which may be the claimant or the claimant's legal representative) possessing ultimate authority to reconcile, settle, or otherwise resolve the claim on behalf of the claimant.

25. Failure to file and serve a timely response by the Response Deadline will result in the claims identified on Schedule 1 and Schedule 2 to the Brandt Declaration being disallowed and expunged, without further notice to the claimant.

SEPARATE CONTESTED MATTER

26. If a response is filed regarding any Schedule 1 Claims or any Schedule 2 Claims, and if the GUC Recovery Trustee is unable to resolve any such response, each claim and the GUC Recovery Trustee's Seventh Omnibus Objection as it pertains to such claims, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, if applicable. Further, the GUC Recovery Trustee requests that any order entered by the Court regarding an objection asserted in this GUC Recovery Trustee's Seventh Omnibus Objection be deemed a separate order with respect to each proof of claim.

NOTICE

27. Notice of the GUC Recovery Trustee's Seventh Omnibus Objection has been given to parties on the master service list who have agreed to accept service by email and by first-class mail to each of the parties identified on Schedule 1 and Schedule 2 to the Brandt Declaration. The GUC Recovery Trustee submits that such notice is sufficient and no other or further notice need be provided.

CONCLUSION

WHEREFORE, the GUC Recovery Trustee respectfully requests that the Court enter the Proposed Order attached as **Exhibit B**: (a) disallowing and expunging Schedule 1 Claims identified on Schedule 1; (b) disallowing and expunging Schedule 2 Claims identified on Schedule 2; and (c) granting such other and further relief as the Court deems just and proper..

Dated: September 28, 2021
New York, New York

/s/ Leo T. Crowley
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Counsel for GUC Recovery Trustee

Response Deadline: November 10, 2021 at 4:00 p.m. (Prevailing Eastern Time)
Hearing Date and Time: November 17, 2021 at 11:00 a.m. (Prevailing Eastern Time)

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Kwame O. Akuffo

Counsel for GUC Recovery Trustee

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

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In re:	:	Chapter 11
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JCK LEGACY COMPANY, <i>et al.</i> ,	:	Case No. 20-10418 (MEW)
	:	
Debtors. ¹	:	(Jointly Administered)
	:	
-----	X	

**NOTICE OF GUC RECOVERY TRUSTEE'S
SEVENTH OMNIBUS OBJECTION AND HEARING**

THIS SEVENTH OMNIBUS OBJECTION SEEKS TO DISALLOW AND EXPUNGE AMENDED/SUPERSEDED SCHEDULED CLAIMS. PARTIES RECEIVING THIS OBJECTION SHOULD REVIEW THE OMNIBUS OBJECTION AND SCHEDULES 1 AND 2 ATTACHED TO THE BRANDT DECLARATION TO DETERMINE WHETHER THE OMNIBUS OBJECTION AFFECTS THEIR CLAIM(S).

PLEASE TAKE NOTICE that William A. Brandt, Jr., in his capacity as trustee of the JCK Legacy GUC Recovery Trust (the "**GUC Recovery Trust**"), filed the *GUC Recovery Trustee's Seventh Omnibus Objection to Amended/Superseded Scheduled Claims* (the "**GUC Recovery Trustee's Seventh Omnibus Objection**") with the United States Bankruptcy Court for the Southern District of New York (the "**Bankruptcy Court**").

¹ The Debtors in these chapter 11 cases and the last four characters of each 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 GUC Recovery Trustee's service address for purposes of these chapter 11 cases is: 110 East 42 Street, Suite 1818 New York, NY 10017.

PLEASE TAKE FURTHER NOTICE that any response to the GUC Recovery Trustee's Seventh Omnibus Objection must be filed on or before **November 10, 2021 at 4:00 p.m. (ET)** (the "**Response Deadline**") with the Bankruptcy Court, Courtroom 617, One Bowling Green, New York, New York 10004. At the same time, you must serve a copy of any response by the Response Deadline upon the undersigned counsel to the movant and to:

- (a) The Debtors, JCK Legacy Company, c/o FTI Consulting, Inc., 1201 W. Peachtree Street, NW, Suite 500, Atlanta, Georgia 30309, Attn.: Sean M. Harding (sean.harding@fticonsulting.com);
- (b) Counsel for the Plan Administration Trustee, Skadden, Arps, Slate, Meagher & Flom LLP, One Manhattan West, New York, New York 10001, Attn.: Shana A. Elberg (shana.elberg@skadden.com) and Bram A. Stochlic (bram.stochlic@skadden.com), 300 South Grand Avenue, Suite 3400, Los Angeles, California 90071, Attn.: Van C. Durrer, II (van.durrer@skadden.com), and Destiny N. Almogue (destiny.almogue@skadden.com) and 525 University Avenue, Palo Alto, California 94301 Attn.: Jennifer Madden (jennifer.madden@skadden.com);
- (c) Co-counsel for the Plan Administration Trustee, Togut, Segal & Segal LLP, One Penn Plaza, Suite 3335, New York, New York 10119, Attn.: Albert Togut (altogut@teamtogut.com) and Kyle J. Ortiz (kortiz@teamtogut.com);
- (d) The GUC Recovery Trust, c/o Development Specialists, Inc., 110 East 42nd Street, Suite 1818, New York, New York 10017 Attn.: William A. Brandt., Jr. (bbrandt@DSIconsulting.com);
- (e) Counsel for the GUC Recovery Trustee, Pillsbury Winthrop Shaw Pittman LLP, 31 West 52nd Street, New York, New York. Attn.: Leo T. Crowley (leo.crowley@pillsburylaw.com), Patrick Fitzmaurice (patrick.fitzmaurice@pillsburylaw.com), and Kwame O. Akuffo (kwame.akuffo@pillsburylaw.com);
- (f) The Office of the United States Trustee, U.S. Federal Office Building, 201 Varick Street, Room 1006, New York, New York 10014, Attn.: Benjamin J. Higgins and Brian S. Masumoto; and
- (g) Any party that has requested notice pursuant to Bankruptcy Rule 2002.

Only those responses made in writing and timely filed in accordance with the above procedures will be considered by the Bankruptcy Court.

PLEASE TAKE FURTHER NOTICE THAT, unless the telephonic hearing procedures set forth in General Order M-543 (Morris, C.J.) are amended, the hearing to consider the GUC Recovery Trustee's Seventh Omnibus Objection shall be held **telephonically via CourtSolutions LLC on November 17, 2021, at 11:00 am(ET)** before the Honorable Michael E. Wiles in the Bankruptcy Court, Courtroom 617, One Bowling Green, New York, New York 10004. Instructions to register for Court Solutions LLC are attached to Gen. Ord. M-543.

PLEASE TAKE FURTHER NOTICE THAT if you fail to respond in accordance with this Notice and by the Response Deadline, the Bankruptcy Court may grant the relief requested in the GUC Recovery Trustee's Seventh Omnibus Objection without further notice or a hearing.

Dated: September 28, 2021
New York, New York

/s/ Leo T. Crowley
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Counsel for GUC Recovery Trustee

Exhibit A

Declaration of William A. Brandt, Jr.

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Leo T. Crowley
Kwame O. Akuffo

Counsel for GUC Recovery Trustee

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

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In re:	:	Chapter 11
	:	
JCK LEGACY COMPANY, <i>et al.</i> ,	:	Case No. 20-10418 (MEW)
	:	
Debtors. ¹	:	(Jointly Administered)
	:	
-----	x	

DECLARATION OF WILLIAM A. BRANDT, JR.
IN SUPPORT OF GUC RECOVERY TRUSTEE'S SEVENTH OMNIBUS OBJECTION

Pursuant to 28 U.S.C. § 1746, I, William A. Brandt, Jr., submit this declaration (the "**Declaration**") under the penalty of perjury and state that the following is true to the best of my knowledge, information, and belief:

1. I am the Executive Chairman of the consulting firm Development Specialists, Inc., better known in the restructuring industry as DSI, and am the GUC Recovery Trustee² for the GUC Recovery Trust created under the Trust Agreement and the Plan.

2. I submit this Declaration in support of the *GUC Recovery Trustee's Seventh Omnibus Objection to Amended/Superseded Scheduled Claims* and state that the information

¹ The Debtors in these chapter 11 cases and the last four characters of each 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 GUC Recovery Trustee's service address for purposes of these chapter 11 cases is: 110 East 42 Street, Suite 1818 New York, NY 10017.

² Capitalized terms used and not otherwise defined herein shall have the meaning ascribed to them in the GUC Recovery Trustee's Seventh Omnibus Objection.

contained in the GUC Recovery Trustee's Seventh Omnibus Objection is true and correct to the best of my knowledge and belief.

3. In my capacity as GUC Recovery Trustee, I and those working under my supervision, reviewed certain remaining claims listed on the claims register prepared and maintained by the claims agent in these chapter 11 cases, Kurtzman Carson Consultants LLC, and concluded that the claims identified on Schedule 1 and Schedule 2 attached hereto and which were included in the debtors' schedules should be disallowed and expunged in their entirety because they apparently were amended or superseded by a proof of claim.

4. The purpose of the GUC Recovery Trustee's Seventh Omnibus Objection (and of the companion GUC Recovery Trustee's Sixth Omnibus Objection) is to confirm the GUC Recovery Trustee's understanding that Schedule 1 Claims and Schedule 2 Claims have been amended or superseded by a proof of claim and to give fair notice and an opportunity to be heard to the creditors identified on those schedules.

5. Bankruptcy Rule 3003(c)(4) states that a proof of claim supersedes the scheduling of the claim. The Trust Agreement also gives me broad authority to adjust the claims register to with respect to general unsecured claims that have been amended, satisfied, or superseded. *See* Trust Agreement, § 6.4.

6. In situations where the same creditor has both a scheduled claim and a proof of claim against the same debtor and in the same amount, or where the proof of claim is for a larger amount than a scheduled claim, I believe that the Bankruptcy Rules and the Trust Agreement empower me to allow just one claim for that creditor. Thus, upon reviewing all remaining scheduled claims which had not been reconciled, I determined that it was not necessary to obtain court approval to adjust the claims register for: (a) scheduled claims that have been amended or

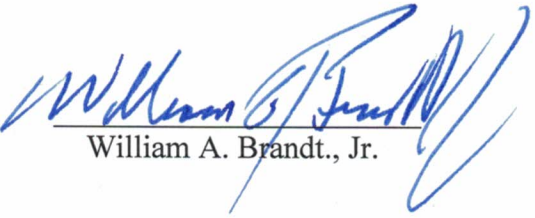
superseded by a proof of claim against the same debtor in the same amount; (b) scheduled claims with lower dollar amounts that have been amended or superseded by a proof of claim with higher dollar amounts against the same debtor; and (c) scheduled claims where the creditor received a cure payment or similar treatment. It was apparent from the claims register that these scheduled claims had been amended or superseded by a proof of claim and therefore those scheduled claims have been expunged. A list of the expunged scheduled claim is attached as Exhibit C to the companion GUC Recovery Trustee's Sixth Omnibus Objection. *See* Docket No. 1278.

7. In other situations, however, where the scheduled claim and proof of claim are against different debtors (although perhaps mistakenly so) or where the scheduled claim is larger than the proof of claim, the right answer is not so self-evident that it is prudent for me to proceed on my own. Thus, notwithstanding Bankruptcy Rule 3003(c)(4) and the broad authority to adjust the claims register, I believe it prudent to obtain court approval to disallow and expunge: (a) scheduled claims with higher dollar amounts that have been amended or superseded by proofs of claim with lower dollar amounts (*i.e.*, Schedule 1 Claims); and (b) scheduled claims that have been amended or superseded by proofs of claim with different amounts and different debtors (*i.e.*, Schedule 2 Claims). An objection to Schedule 1 Claims and Schedule 2 Claims is necessary to ensure that the affected creditors are appropriately noticed and given an opportunity to respond to the proposed adjustment of their scheduled claims.

8. Accordingly, I respectfully request that the creditors' claims be limited to their proofs of claim, and that Schedule 1 Claims and Schedule 2 Claims be disallowed and expunged.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is the true and correct to the best of my knowledge and belief.

Dated: September 26, 2021



William A. Brandt., Jr.

Schedule 1

Schedule 1 Claims

Name of Claimant	Date Filed	Surviving Claim No.	Surviving Claim Amount	Schedule ID(s)	Disallowed Scheduled Claim Amount(s)	Basis for Disallowance
Travelers Indemnity Company and Its Property Casualty Insurance Affiliates	07/07/2020	1941	Unliquidated	3225214	\$3,945,000.00	Scheduled claim amended/superseded by a proof of claim.
TXU Energy Retail Company, LLC	05/06/2020	138	\$3,852.95	3223937; 3224571	\$3,663.68; \$572.61	Scheduled claim amended/superseded by a proof of claim.
Waste Management Corporate Services	06/24/2020	1334	\$3,342.88	3222227; 3222846 3224277; 3224789	\$2,623.26; \$196.27 \$142.25; \$1,107.48	Scheduled claim amended/superseded by a proof of claim.
Wells Fargo Vendor Financial Services, LLC C/O Ricoh USA Program, IKON Financial Services	42, 937	03/02/2020 06/10/2020	\$8,603.71; \$6,351.59	3220063; 3220514 3222163; 3222796 3223111; 3224152 3224548; 3224766 3224790	\$9.31; \$65.78 \$145.47; \$564.93 \$1,051.05; \$21.64 \$6.35; \$450.24 \$307.52	Scheduled claim amended/superseded by a proof of claim.
William B. McClatchy	07/08/2020	1763	Unliquidated	3222233	\$1,500.00	Scheduled claim amended/superseded by a proof of claim.
Wipro Limited	05/19/2020	156	\$3,483,272.56	3224581	\$719,122.36	Scheduled claim amended/superseded by a proof of claim.
Xerox Corp.	06/08/2020	362	\$775.78	3224278	\$1,852.64	Scheduled claim amended/superseded by a proof of claim.

Schedule 2

Schedule 2 Claims

Name of Claimant	Date Filed	Surviving Claim No.	Surviving Claim Amount	Schedule ID(s)	Disallowed Scheduled Claim Amount(s)	Basis for Disallowance
Storyful Americas LLC	03/23/2020	57	\$8,000.00	3222813; 3222184	\$2,275.86; \$5,500.00	Scheduled claim amended/superseded by a proof of claim.
T-Mobile USA Inc.	03/06/2020	45	\$10,890.24	3222816; 3223126 3224154	\$266.75; \$246.97 \$289.48	Scheduled claim amended/superseded by a proof of claim.
Verizon Wireless	04/27/2020	128	\$18,076.12	3220542; 3221033 3222217; 3222838 3224574; 3224787 3222218; 3220066 3220543; 3222475 3222917; 3223136 3223589; 3224057 3224575; 3224788	\$484.47; \$138.68 \$6,861.94; \$8,940.90 \$1,029.26; \$1,494.30 \$0.00; \$106.26 \$495.48; \$1,725.87 \$140.36; \$1,028.25 \$104.01; \$1,294.18 \$434.14; \$620.95	Scheduled claim amended/superseded by a proof of claim.
Wipro Limited	05/19/2020	156	\$3,483,272.56	3224581	\$719,122.36	Scheduled claim amended/superseded by a proof of claim.

Exhibit B

Proposed Order

PILLSBURY WINTHROP SHAW PITTMAN LLP
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Kwame O. Akuffo

Counsel for GUC Recovery Trustee

**UNITED STATES BANKRUPTCY COURT
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In re:	:	Chapter 11
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	:	
Debtors. ¹	:	(Jointly Administered)
	:	
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**ORDER GRANTING GUC RECOVERY TRUSTEE'S SEVENTH OMNIBUS
OBJECTION TO AMENDED/SUPERSEDED SCHEDULED CLAIMS**

Upon consideration of the *GUC Recovery Trustee's Seventh Omnibus Objection to Amended/Superseded Scheduled Claims* (the "**GUC Recovery Trustee's Seventh Omnibus Objection**") to disallow and expunge the proofs of claim: (a) identified on Schedule 1 (the "**Schedule 1 Claims**"); (b) and identified on Schedule 2 (the "**Schedule 2 Claims**"); and the *Declaration of William A. Brandt, Jr.*; and the Court having jurisdiction to consider the GUC Recovery Trustee's Seventh Omnibus Objection and relief requested under 28 U.S.C. §§ 157 and 1334; and the GUC Recovery Trustee's Seventh Omnibus Objection and relief requested being a core proceeding under 28 U.S.C. § 157(b)(2); and venue being proper before this Court under 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the GUC Recovery Trustee's Seventh

¹ The Debtors in these chapter 11 cases and the last four characters of each 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 GUC Recovery Trustee's service address for purposes of these chapter 11 cases is: 110 East 42 Street, Suite 1818 New York, NY 10017.

Omnibus Objection having been provided; and it appearing that no other notice is needed; and such relief being in the best interest of the Debtors' estates and its creditors, and the GUC Recovery Trust²; and the Court having considered all papers submitted; and for good cause shown;

It is hereby **ORDERED** that:

1. The GUC Recovery Trustee's Seventh Omnibus Objection is **SUSTAINED** to the extent set forth herein.

2. Schedule 1 Claims identified on Schedule 1 are disallowed and expunged.

3. Schedule 2 Claims identified on Schedule 2 are disallowed and expunged.

4. The GUC Recovery Trustee's rights to object to proofs of claim related to the Schedule 1 Claims and Schedule 2 Claims on any and all grounds and/or for any other purposes is expressly reserved.

5. The GUC Recovery Trustee or the claims agent is authorized and directed to modify the claims register and other case records in accordance with the terms of this Order.

6. The Court shall retain jurisdiction over any matter arising from or related to the implementation of this Order.

Dated: November __, 2021
New York, NY

Michael E. Wiles
United States Bankruptcy Judge

² Capitalized terms used and not otherwise defined herein shall have the meaning ascribed to them in the GUC Recovery Trustee's Seventh Omnibus Objection.