

**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.	:	(Jointly Administered)
	:	
-----x	:	Related Docket No. 1159

**VERIFIED MOTION TO SET ASIDE ORDER ENTERED APRIL 29, 2021 AS TO THE
SUPPORTED UNLIQUIDATED CLAIM INVOLVING HERNANDO SANDOVAL -
CLAIM # 2047- ONLY**

The Movant, Hernando Sandoval, files this Motion to Set Aside Order entered April 29, 2021 regarding the supported unliquidated claim involving Hernando Sandoval – Claim# 2047, and states as follows:

1. On April 29, 2021, an Order was entered by the Honorable Michael Wiles, U.S. Bankruptcy Judge, Granting the Plan Administration Trustee’s Thirty Sixth Omnibus Objection to Claims thereby disallowing and expunging certain Unliquidated Claims. A copy of the Order is attached and marked as Exhibit “A”.

2. The movant, and supported unliquidated claim holder, Hernando Sandoval, has an active civil claim in the Circuit Court of the Eleventh Judicial Circuit in and for Miami-Dade County, Florida (case number 14-020039-CA-01) against Defendant/Debtor, Miami Herald Media Company.

3. The undersigned, on behalf of Hernando Sandoval, was notified on April 29, 2021, for the very first time, of the U.S. Bankruptcy Courts Order, by way of Defendant/Debtor, Miami Herald Media Co’s, filing the U.S. Bankruptcy Order into the Miami-Dade Circuit Court Docket as a



Notice of Filing the Notice of Denial of Plaintiff's Claim in the U.S. Bankruptcy Court. A copy of Defendants Notice of Filing is attached and marked as Exhibit "B".

4. Prior to entry of the Order on April 29, 2021 and receipt of same through the Circuit Court docket, the undersigned did not receive Notice of the Trustee's Thirty-Sixth Omnibus Objections to Claims. Additionally, the undersigned did not receive notice of the Hearing to be held on April 28, 2021 regarding the Objections to Claims. The only reason the undersigned received the U. S. Bankruptcy Court Order was the filing of the Order by Defendant Miami Herald Media Company into the Court Record in the Circuit Court; however, the same Defendant DID NOT file the Notice of Objections nor the Notice of Hearing into the Circuit Court docket, nor did the undersigned receive notice from the Bankruptcy Court of the Objections or the Hearing.

5. On April 30, 2021, the undersigned immediately reached out to counsel of record in the Bankruptcy proceeding to address the lack of notice and due process issues, including the potential of an agreed Order to set aside the specific claim involving Hernando Sandoval. However, during June of 2021, the communications fell apart. See attached emails marked as composite Exhibit "C".

6. Initially, we were advised that the parties to the Bankruptcy action would likely have no problem setting aside the discharge of Mr. Sandoval's claim – once discussions between the various parties took place. However, in June, 2021 we learned that the parties either could not, or would not agree, and requested we file a pleading into the Bankruptcy Record to request the Order discharging Ms. Sandoval's claim be vacated.

7. We do not believe there is an objection to the allegation(s).

8. For these reasons, we respectfully request the Order discharging Mr. Sandoval's claim be vacated – as to Sandoval, and allow his right to a claim proceed.

WHEREFORE the movant and supported unliquidated claim holder, Hernando Sandoval, respectfully move this Honorable Court to Enter an Order granting the Movant's Motion to Set Aside the Supported Unliquidated Claim of Hernando Sandoval from the Order entered April 29, 2021 disallowing and expunging the claim in its entirety as to claim #2047, only.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion to Set Aside the Supported Unliquidated Claim of Hernando Sandoval from the Order entered April 29, 2021 disallowing and expunging the claim in its entirety has been sent via e-mail to all counsel on the attached Service List, this 17th day of August, 2021.

Respectfully submitted,
Attorneys for Plaintiff
Bram J. Gechtman, Esquire
Law Offices of Bram J. Gechtman, PA
175 Southwest 7th Street, #1804
Miami, FL 33130
(305) 222-7836 Telephone
(786) 245-8495 Facsimile

/s/Bram J. Gechtman, Esq.
Bram J. Gechtman, Esq.
Florida Bar No. 538701
Primary: bjg@gcflalaw.com
Secondary: rosa@gcflalaw.com
ana@gcflalaw.com

SERVICE LIST

Robert Tacher, Esq.
PETERSON BERNARD
707 S.E. Third Avenue, Suite 500
Ft. Lauderdale, FL 33316
rtacher@ftl-law.com
mludwig@ftl-law.com
lnuta@ftl-law.com

EXHIBIT

“A”

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. 1159

ORDER GRANTING PLAN ADMINISTRATION
TRUSTEE'S THIRTY-SIXTH OMNIBUS OBJECTION TO CLAIMS
(UNLIQUIDATED 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 Unliquidated 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 April 23, 2021; and upon the hearing conducted before this Court on April 28, 2021 to consider the Objection (the “**Hearing**”) and upon the record of the Hearing; 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 Unliquidated Claims listed on **Exhibit 1** and **Exhibit 2** annexed 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** and **Exhibit 2** annexed 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 Unliquidated Claims that are not disallowed and expunged 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 or amount of the Unliquidated 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 Unliquidated 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
April 29, 2021

s/Michael E. Wiles

HONORABLE MICHAEL E. WILES
UNITED STATES BANKRUPTCY JUDGE

EXHIBIT 1

Supported Unliquidated Claims

EXHIBIT 1

Supported Unliquidated 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 AIG Property Casualty, Inc. and its affiliates identified on the Addendum hereto Attn Kevin J. Larner, Esq. 80 Pine Street, 13th Floor New York, NY 10005	91	4/1/20	Gulf Publishing Company, Inc. 20-10428	\$ - (S) - (A) - (B) - (P) UNLIQUIDATED (U) UNLIQUIDATED (T)
2 Carolan Kelly Stiles Paul Manasian, Esq. 1310 65th Street Emeryville, CA 94508	2207	7/10/20	The McClatchy Company 20-10418	\$ - (S) - (A) - (B) - (P) UNLIQUIDATED (U) UNLIQUIDATED (T)
3 Hernando Sandoval Attn Bram Gechtman Law Offices of Bram Gechtman, PA 175 Southwest 7th Street, #1804 Miami, FL 33130	2047	7/9/20	Miami Herald Media Company 20-10450	\$ - (S) - (A) - (B) - (P) UNLIQUIDATED (U) UNLIQUIDATED (T)

EXHIBIT 2

Unsupported Unliquidated Claims

Unsupported Unliquidated 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 #
1	Brian Bristow 6305 Creekcrest Circle Citrus Heights, CA 95621-6205	2201	7/10/20	The McClatchy Company 20-10418
				\$ - (S)
				- (A)
				- (B)
				UNLIQUIDATED (P)
				- (U)
				UNLIQUIDATED (T)
2	Luanne M Rykaczewski PO Box 875421 Wasilla, AK 99687-5421	2696	1/8/21	The McClatchy Company 20-10418
				\$ - (S)
				- (A)
				- (B)
				UNLIQUIDATED (P)
				- (U)
				UNLIQUIDATED (T)

EXHIBIT

“B”

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT, IN AND FOR MIAMI-
DADE, FLORIDA

Case No. 14-020039CA01

HERNANDO SANDOVAL,

Plaintiff,
vs.

MIAMI HERALD MEDIA COMPANY,

Defendants.

_____ /

NOTICE OF FILING

COMES NOW, the Defendant and hereby files the attached Notice of Denial of
the Plaintiff's Claim in the U.S. Bankruptcy Court.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing was furnished
by e-mail to **Bram J. Gechtman, Esq.**, (bjg@gcflalaw.com); (rosa@gcflalaw.com);
(ana@gcflalaw.com); *Attorney for Plaintiff*, 175 S.W. 7 Street, Suite 1804, Miami, FL
33130, on this 29th day of April, 2021.

By /s/ Robert F. Tacher
ROBERT F. TACHER, ESQ.
Florida Bar # 231592
PETERSON BERNARD
Attorneys for Defendant
707 S.E. 3rd Avenue, Suite 500
Fort Lauderdale, Florida 33316
954-763-3200
954-728-9019 (facsimile)
Robert.Tacher@petersonbernard.com
Nelly.Tacher@petersonbernard.com
Nicole.Raffa@petersonbernard.com

RFT/nmr
7102.87090

COMPOSITE EXHIBIT “C”

Ana Flores

From: Bram J. Gechtman
Sent: Tuesday, August 17, 2021 2:23 PM
To: Ana Flores
Subject: FW: JCK LEGACY COMPANY: Sandoval, Hernando v. Miami Herald Media Company - CASE NO.: 14-20039-

From: Bram J. Gechtman <bjg@gcflalaw.com>
Sent: Tuesday, June 1, 2021 5:18 PM
To: 'Katharine Scott' <kscott@teamtogut.com>; Fitzmaurice, Patrick E. <patrick.fitzmaurice@pillsburylaw.com>
Subject: Re: JCK LEGACY COMPANY: Sandoval, Hernando v. Miami Herald Media Company - CASE NO.: 14-20039-

Just tried you back. 3057853272. Thanks

Sent from my Verizon, Samsung Galaxy smartphone
Get [Outlook for Android](#)

From: Fitzmaurice, Patrick E. <patrick.fitzmaurice@pillsburylaw.com>
Sent: Tuesday, June 1, 2021 5:06:42 PM
To: Bram J. Gechtman <bjg@gcflalaw.com>; 'Katharine Scott' <kscott@teamtogut.com>
Subject: RE: JCK LEGACY COMPANY: Sandoval, Hernando v. Miami Herald Media Company - CASE NO.: 14-20039-

Bram,

I just tried to call you. please give me a call back when you can. You can get me on my cell – 917.608.8497

Thanks.

From: Bram J. Gechtman <bjg@gcflalaw.com>
Sent: Tuesday, June 1, 2021 3:01 PM
To: Fitzmaurice, Patrick E. <patrick.fitzmaurice@pillsburylaw.com>; 'Katharine Scott' <kscott@teamtogut.com>
Subject: RE: JCK LEGACY COMPANY: Sandoval, Hernando v. Miami Herald Media Company - CASE NO.: 14-20039-

Thank you. We simply want our client's expunged claim set aside and reinstated.

BRAM J. GECHTMAN
ATTORNEY AT LAW
THE LAW OFFICES OF BRAM J. GECHTMAN, PA
FIGHTING BAD FAITH INSURANCE PRACTICES IN
WORKERS' COMPENSATION, PERSONAL INJURY
AND COMMERCIAL BUSINESS MATTERS

LATITUDE ONE INTERNATIONAL BUSINESS CENTER
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gechtmanlaw.com

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From: Fitzmaurice, Patrick E. <patrick.fitzmaurice@pillsburylaw.com>
Sent: Tuesday, June 1, 2021 2:59 PM
To: Bram J. Gechtman <bjg@gcflalaw.com>; 'Katharine Scott' <kscott@teamtogut.com>
Subject: RE: JCK LEGACY COMPANY: Sandoval, Hernando v. Miami Herald Media Company - CASE NO.: 14-20039-

Thanks Bram, I am going to call him to try and figure out what's going on.

Patrick E. Fitzmaurice | Partner
Pillsbury Winthrop Shaw Pittman LLP
31 West 52nd Street | New York, NY 10019-6131
t +1.212.858.1171 | m +1.917.608.8497
patrick.fitzmaurice@pillsburylaw.com | website bio

From: Bram J. Gechtman <bjg@gcflalaw.com>
Sent: Tuesday, June 1, 2021 2:56 PM
To: 'Katharine Scott' <kscott@teamtogut.com>
Cc: Fitzmaurice, Patrick E. <patrick.fitzmaurice@pillsburylaw.com>
Subject: RE: JCK LEGACY COMPANY: Sandoval, Hernando v. Miami Herald Media Company - CASE NO.: 14-20039-

Just in follow up. The attorney for Miami Herald has just advised me that he is moving forward as the "messenger" for the trustees – ??

I apologize, but I need to know what is going on here. We have been diligent to have this issue corrected since the day it happened a month ago. I'm feeling concerned that there is something going on here that we are not being apprised of?

BRAM J. GECHTMAN
ATTORNEY AT LAW
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From: Katharine Scott <kscott@teamtogut.com>

Sent: Tuesday, June 1, 2021 2:32 PM

To: Bram J. Gechtman <bjg@gcflalaw.com>

Cc: Patrick E. Fitzmaurice <patrick.fitzmaurice@pillsburylaw.com>

Subject: Re: JCK LEGACY COMPANY: Sandoval, Hernando v. Miami Herald Media Company - CASE NO.: 14-20039-

Importance: High

Hi Bram,

I hope you had a nice holiday weekend and no apologies necessary. I am looping in my colleague, Patrick Fitzmaurice of Pillsbury (counsel to the GUC Recovery Trustee) on this high-priority matter. Would you mind sending us the filing so we can see who we need to contact?

I am prepping an expedited ch 11 filing so I may not be able to respond immediately today, but Patrick is going to step in and reach out to those involved at the Miami Herald to straighten this out.

Thank you for your continued patience and willingness to work with us to resolve this matter.

Best regards,

Kat

Katharine E. Scott

Togut, Segal & Segal LLP

One Penn Plaza, Suite 3335 | New York, NY 10119

Direct: +1 212 201 5572 | Mobile: +1 805 404 9733

kscott@teamtogut.com | togutlawfirm.com

TOGUT SEGAL & SEGAL LLP

On Jun 1, 2021, at 2:19 PM, Bram J. Gechtman <bjg@gcflalaw.com> wrote:

Hi Kat, sorry to bother you with this on the first day back after a Holiday weekend, but we received a pleading on Friday evening (holiday weekend), representing to the Circuit Court Judge in Miami, Florida that our claim is permanently expunged and disposed of. Miami Herald appears now to be moving to dismiss our claim(s) before the Circuit Court for lack of jurisdiction and/or disposition by the Bankruptcy Court. As you can imagine, we are quite concerned by this – less than ethical – activity, especially given our good faith attempts to have this disposition set aside since the day we learned about it.

Can you please let us know what we need to do in order to get a special set hearing before the Bankruptcy Judge so that we may educate the Judge regarding Miami Herald's attempt to dispose of our client's claim without notice and due process before the Federal Court. We believe the Federal Judge will frown upon this conduct and move swiftly to address those responsible. Thank you.

BRAM J. GECHTMAN
ATTORNEY AT LAW

THE LAW OFFICES OF BRAM J. GECHTMAN, PA
FIGHTING BAD FAITH INSURANCE PRACTICES IN
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From: Katharine Scott <kscott@teamtogut.com>

Sent: Wednesday, May 26, 2021 11:56 AM

To: Bram J. Gechtman <bjg@gcflalaw.com>

Subject: Re: JCK LEGACY COMPANY: Sandoval, Hernando v. Miami Herald Media Company - CASE NO.: 14-20039-

Hi Bram,

I'm so sorry but I had an emergency just come up and I need to reschedule our call. I will circle back as soon as I have a new time. Are you available later today or tomorrow afternoon?

My apologies again and I look forward to speaking soon.

Best regards,

Kat

Katharine E. Scott

Togut, Segal & Segal LLP

One Penn Plaza, Suite 3335 | New York, NY 10119

Direct: +1 212 201 5572 | Mobile: +1 805 404 9733

kscott@teamtogut.com | togutlawfirm.com

<image001.png>

On May 21, 2021, at 12:17 PM, Bram J. Gechtman <bjg@gcflalaw.com> wrote:

Wednesday is good. Thanks.

Sent from my Verizon, Samsung Galaxy smartphone

Get [Outlook for Android](#)

From: Katharine Scott <kscott@teamtogut.com>

Sent: Friday, May 21, 2021 12:14:15 PM

To: Bram J. Gechtman <bjg@gcflalaw.com>

Subject: Re: JCK LEGACY COMPANY: Sandoval, Hernando v. Miami Herald Media Company - CASE NO.: 14-20039-

Hi Bram,

After speaking with the client and counsel to the GUC Recovery Trustee again, we would like to schedule a call with you to work through some ancillary issues. I'm out of the office for a few days but have general availability on Wednesday and Thursday next week. If you would like to suggest some times that work for you (if you are available those days), I will take them back to counsel to the GUC Recovery Trustee.

Best regards,
Kat

Katharine E. Scott

Togut, Segal & Segal LLP

One Penn Plaza, Suite 3335 | New York, NY 10119

Direct: +1 212 201 5572 | Mobile: +1 805 404 9733

kscott@teamtogut.com | togutlawfirm.com

<597CF39D-802E-4454-B1AD-DA0D1DE7FE3A.png>

On May 20, 2021, at 10:21 AM, Bram J. Gechtman <bjg@gcflalaw.com> wrote:

Hi Kat, just following back up on this. I know that you were going to get the final approval on Friday, May 7, 2021, but I did not hear back. Just wanted to confirm. Thank you.

BRAM J. GECHTMAN

ATTORNEY AT LAW

THE LAW OFFICES OF BRAM J. GECHTMAN, PA

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From: Katharine Scott <kscott@teamtogut.com>
Sent: Wednesday, May 5, 2021 12:12 PM
To: Bram J. Gechtman <bjg@gcflalaw.com>
Subject: Re: JCK LEGACY COMPANY: Sandoval, Hernando v. Miami Herald Media Company - CASE NO.: 14-20039-

Hi Bram,

We spoke with counsel to the GUC Recovery Trustee yesterday and they agreed my proposal made sense conceptually and they are taking the issue back to their client. We also have a call scheduled with our client, the Plan Administration Trustee, tomorrow. We should have a definitive answer on next steps by Friday at the latest. Apologies for the delays, just a lot of rungs on the latter for this.

Best regards,
Kat

Katharine E. Scott
Togut, Segal & Segal LLP
One Penn Plaza, Suite 3335 | New York, NY 10119
Direct: +1 212 201 5572 | Mobile: +1 805 404 9733
kscott@teamtogut.com | togutlawfirm.com

<image001.png>

On May 4, 2021, at 11:16 AM, Bram J. Gechtman
<bjg@gcflalaw.com> wrote:

Thanks so much Kat

BRAM J. GECHTMAN
ATTORNEY AT LAW
THE LAW OFFICES OF BRAM J. GECHTMAN, PA
FIGHTING BAD FAITH INSURANCE PRACTICES IN
WORKERS' COMPENSATION, PERSONAL INJURY
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From: Katharine Scott <kscott@teamtogut.com>
Sent: Tuesday, May 4, 2021 10:40 AM
To: Bram J. Gechtman <bjg@gcflalaw.com>
Subject: Re: JCK LEGACY COMPANY: Sandoval,
Hernando v. Miami Herald Media Company - CASE NO.:
14-20039-

Hi Bram,

The GUC Recovery Trustee's team was not available yesterday afternoon, but we have a call scheduled for 11 am. I will circle back with you after the call. Apologies - I meant to email you last night.

Best regards,
Kat

Katharine E. Scott
Togut, Segal & Segal LLP
One Penn Plaza, Suite 3335 | New York, NY 10119
Direct: +1 212 201 5572 | Mobile: +1 805 404 9733
kscott@teamtogut.com | togutlawfirm.com

<image001.png>

On May 3, 2021, at 1:58 PM, Bram J.
Gechtman <bjg@gcflalaw.com> wrote:

Thank you.

BRAM J. GECHTMAN
ATTORNEY AT LAW
**THE LAW OFFICES OF BRAM J.
GECHTMAN, PA**
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From: Katharine Scott
<kscott@teamtogut.com>
Sent: Monday, May 3, 2021 1:52 PM
To: Bram J. Gechtman
<bjg@gcflalaw.com>
Cc: Rosa Mederos
<rosa@gcflalaw.com>; Ana Flores
<Ana@gcflalaw.com>; Darien McMillan
<dmm@gcflalaw.com>; Kyle Ortiz
<kortiz@teamtogut.com>; Minta Nester
<mvester@teamtogut.com>; Marino
D'Alessandro
<mdalessandro@teamtogut.com>
Subject: Re: JCK LEGACY COMPANY:
Sandoval, Hernando v. Miami Herald
Media Company - CASE NO.: 14-20039-

Hi Bram,

Not a problem, I understand. I will be
speaking with counsel to the GUC

Recovery Trustee this afternoon to discuss Mr. Sandoval's claim and next steps. I hope to have a definitive answer for you by this evening.

Best regards,
Kat

Katharine E. Scott

Togut, Segal & Segal LLP
One Penn Plaza, Suite 3335 | New York, NY 10119
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<image001.png>

On May 3, 2021, at 1:07 PM, Bram J. Gechtman
<big@gcflalaw.com>
wrote:

Hi Kat, I know you probably came back to a million things on your plate today, just wanted to follow up so you don't forget about us. Thanks.

BRAM J. GECHTMAN
ATTORNEY AT LAW
**THE LAW OFFICES
OF BRAM J.
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From: Katharine Scott

kscott@teamtogut.com
[m](#)>

Sent: Friday, April 30,
2021 2:58 PM

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Subject: Re: JCK

LEGACY COMPANY:

Sandoval, Hernando v.

Miami Herald Media

Company - CASE NO.:

14-20039-

Importance: High

Hi Bram,

It was nice speaking
with you. Below please
find my contact
information. We will be
in touch regarding next
steps.

Best regards,

Kat

Katharine E. Scott

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B
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G**