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Leo T. Crowley
Kwame O. Akuffo

Counsel for GUC Recovery Trustee

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

-----	X	
In re:	:	Chapter 11
	:	
JCK LEGACY COMPANY, <i>et al.</i> ,	:	Case No. 20-10418 (MEW)
	:	
Debtors. ¹	:	(Jointly Administered)
	:	
-----	X	Related Docket No. 1260

**CERTIFICATE OF NO OBJECTION TO GUC RECOVERY TRUSTEE'S FIFTH
OMNIBUS OBJECTION TO BLANK CLAIMS, LATE-FILED CLAIMS, AND
INSUFFICIENT DOCUMENTATION CLAIMS**

The undersigned counsel to William A. Brandt, Jr., trustee of the GUC Recovery Trust (the "**GUC Recovery Trustee**") established under the GUC Recovery Trust Agreement and the *First Amended Joint Chapter 11 Plan of Distribution of JCK Legacy Company and Its Affiliated Debtors and Debtors in Possession* [Docket No. 867], respectfully states:

1. On September 17, 2021, the GUC Recovery Trustee filed and served the *GUC Recovery Trustee's Fifth Omnibus Objection to Blank Claims, Late-Filed Claims, and Insufficient Documentation Claims* (the "**Objection**") [Docket No. 1260].

¹ The last four digits of Debtor The McClatchy Company's tax identification number are 0478. Due to the large number of debtor entities in these jointly administered chapter 11 cases, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <http://www.kccllc.net/McClatchy>. The location of the Debtors' service address for purposes of these chapter 11 cases is: 2100 Q Street, Sacramento, California 95816.



2. The Notice to the Objection stated that responses to the Objection were to be filed, served and received no later than October 13, 2021 at 4:00 p.m. (ET).

3. The undersigned counsel hereby certifies that no response to the Objection has been received. The undersigned counsel also certifies that he has reviewed the docket in this case and no response to the Objection appears thereon. Nor have the undersigned counsel received any informal response.

4. In accordance with the 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 to file and serve a response to the Objection.

5. Due to the forgoing, it is respectfully requested that the Court enter the Proposed Order attached as **Exhibit A**, a blacklined version of which order against the original version is attached as **Exhibit B**.

Dated: October 15, 2021
New York, New York

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

Exhibit A

Proposed Order

PILLSBURY WINTHROP SHAW PITTMAN LLP
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**ORDER GRANTING GUC RECOVERY TRUSTEE'S FIFTH
OMNIBUS OBJECTION TO BLANK CLAIMS, LATE-FILED
CLAIMS, AND INSUFFICIENT DOCUMENTATION CLAIMS**

Upon consideration of the *GUC Recovery Trustee's Fifth Omnibus Objection to Blank Claims, Late-Filed Claims, and Insufficient Documentation Claims* (the "**GUC Recovery Trustee's Fifth Omnibus Objection**") to disallow and expunge the proofs of claim identified on Schedule 1; and the *Declaration of William A. Brandt, Jr.*; and the Certificate of No Objection to the GUC Recovery Trustee's Fifth Omnibus Objection having been filed on October 15, 2021; and the Court having jurisdiction to consider the GUC Recovery Trustee's Fifth Omnibus Objection and relief requested under 28 U.S.C. §§ 157 and 1334; and the GUC Recovery Trustee's Fifth Omnibus Objection and relief requested being a core proceeding under 28 U.S.C. § 157(b)(2); and

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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 Fifth 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 Fifth Omnibus Objection is **SUSTAINED** to the extent set forth herein.

2. The Blank Claims, Late-Filed Claims, and Insufficient Documentation Claims identified on Schedule 1 are disallowed and expunged.

3. The GUC Recovery Trustee's rights to object to the Blank Claims, Late-Filed Claims, and Insufficient Documentation Claims on any and all grounds and/or for any other purposes is expressly reserved.

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

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

Dated: October __, 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 Fifth Omnibus Objection.

Exhibit B

Blacklined Proposed Order

PILLSBURY WINTHROP SHAW PITTMAN LLP
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**ORDER GRANTING GUC RECOVERY TRUSTEE’S FIFTH
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Upon consideration of the *GUC Recovery Trustee’s Fifth Omnibus Objection to Blank Claims, Late-Filed Claims, and Insufficient Documentation Claims* (the “**GUC Recovery Trustee’s Fifth Omnibus Objection**”) to disallow and expunge the proofs of claim identified on Schedule 1; and the *Declaration of William A. Brandt, Jr.*; and the [Certificate of No Objection to the GUC Recovery Trustee’s Fifth Omnibus Objection having been filed on October 15, 2021](#); and [the](#) Court having jurisdiction to consider the GUC Recovery Trustee’s Fifth Omnibus Objection and relief requested under 28 U.S.C. §§ 157 and 1334; and the GUC Recovery Trustee’s Fifth Omnibus Objection and relief requested being a core proceeding under 28 U.S.C. § 157(b)(2); and

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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 Fifth 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 Fifth Omnibus Objection is **SUSTAINED** to the extent set forth herein.

2. The Blank Claims, Late-Filed Claims, and Insufficient Documentation Claims identified on Schedule 1 are disallowed and expunged.

3. The GUC Recovery Trustee's rights to object to the Blank Claims, Late-Filed Claims, and Insufficient Documentation Claims on any and all grounds and/or for any other purposes is expressly reserved.

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

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

Dated: October __, 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 Fifth Omnibus Objection.

Summary report: Litera® Change-Pro for Word 10.11.1.0 Document comparison done on 10/14/2021 5:59:56 PM	
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Intelligent Table Comparison: Active	
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Modified DMS: nd://4824-4112-0767/2/Fifth Omnibus Objection Order.docx	
Changes:	
<u>Add</u>	4
Delete	0
Move From	0
<u>Move To</u>	0
<u>Table Insert</u>	0
Table Delete	0
<u>Table moves to</u>	0
Table moves from	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
Total Changes:	4