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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	
In re:	:
	:
JCK LEGACY COMPANY, <i>et al.</i> ,	:
	:
Wind-Down Debtors. ¹	:
-----X	

Chapter 11
Case No. 20-10418 (MEW)
(Jointly Administered)

**CERTIFICATE OF NO OBJECTION TO
GUC RECOVERY TRUSTEE’S FOURTH OMNIBUS
OBJECTION TO LATE FILED CLAIMS OF FEDEX
CORPORATE SERVICES, INC. AND ADVANCE LOCAL MEDIA**

The undersigned counsel to 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 and the confirmed *First Amended Joint Chapter 11 Plan of Distribution of JCK Legacy Company and its affiliated Debtors and Debtors in Possession* respectfully states:

1. On August 20, 2021, the GUC Recovery Trustee filed and served the *GUC Recovery Trustee’s Fourth Omnibus Objection to Late Filed Claims of FedEx Corporate Services, Inc. and Advance Local Media* (the “Objection”) [doc. 1242].
2. The Notice to the Objection stated that responses to the Objection were to be filed, served and received no later than October 15, 2021 at 4:00 p.m. (ET).

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 GUC Recovery Trustee’s service address for purposes of these chapter 11 cases is % Development Specialists, Inc., 110 East 42nd Street, Suite 1818, New York, NY 10017.



3. The undersigned hereby certifies that no response to the Objection has been received; he has reviewed the docket in this case and no response to the Objection appears thereon; and he has not received any informal response.

4. In accordance with Rule 9075-2 of the Local Bankruptcy Rules for the Southern District of New York, this certificate is being filed not less than 48 hours after expiration of the deadline to file and serve a response to the Objection.

5. As a result of the foregoing, the GUC Recovery Trustee respectfully requests that the Court enter the proposed order attached as Exhibit 1.

Dated: New York, New York
October 18, 2021

RICH MICHAELSON MAGALIFF, LLP
Co-counsel for the GUC Recovery Trustee
By:

/s/ Howard P. Magaliff
HOWARD P. MAGALIFF
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Exhibit 1

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	
In re:	:
	:
JCK LEGACY COMPANY, <i>et al.</i> ,	:
	:
Wind-Down Debtors. ¹	:
-----X	

Chapter 11
Case No. 20-10418 (MEW)
(Jointly Administered)

**ORDER GRANTING GUC RECOVERY TRUSTEE’S FOURTH
OMNIBUS OBJECTION TO LATE FILED CLAIMS OF FEDEX
CORPORATE SERVICES, INC. AND ADVANCE LOCAL MEDIA**

Upon consideration of the *GUC Recovery Trustee’s Fourth Omnibus Objection to Late Filed Claims of FedEx Corporate Services, Inc. and Advance Local Media* dated August 20, 2021 (the “Fourth Omnibus Objection”) to disallow and expunge the late filed proofs of claim of FedEx Corporate Services, Inc. (“FedEx”) and Advance Local Media (“ALM”); and the Court having jurisdiction to consider the Fourth Omnibus Objection and relief requested under 28 U.S.C. §§ 157 and 1334; and the GUC Recovery Trustee’s Fourth Omnibus Objection 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 Fourth Omnibus Objection having been given as evidenced by the Certificate of Service filed at doc. 1245; and no other notice being required; 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

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

papers submitted; and a Certificate of No Objection having been filed on October 18, 2021; and a hearing having been held on October 20, 2021; and for good cause shown, it is

ORDERED that the GUC Recovery Trustee's Fourth Omnibus Objection is SUSTAINED to the extent set forth herein; and it is further

ORDERED that, pursuant to 11 U.S.C. §§ 105 and 502 and Bankruptcy Rule 3007, the FedEx Claims, identified on the claims register maintained by Kurtzman Carson Consultants, LLC ("KCC") as claim # 2685 and claim # 2686 filed against Cypress Media Inc. d/b/a The McClatchy Company be, and hereby are disallowed and expunged; and it is further

ORDERED that, pursuant to 11 U.S.C. §§ 105 and 502 and Bankruptcy Rule 3007, the ALM Claim, identified on the claims register maintained by KCC as claim # 2664 filed against The McClatchy Company be, and hereby is disallowed and expunged; and it is further

ORDERED that The GUC Recovery Trustee's rights to object to the FedEx Claims and the ALM Claim on any and all grounds and/or for any other purposes is expressly reserved; and it is further

ORDERED that the GUC Recovery Trustee or KCC is authorized and directed to modify the claims register in accordance with the terms of this Order; and it is further

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

Dated: New York, New York
October __, 2021

Michael E. Wiles
United States Bankruptcy Judge