

Response Deadline: July 13, 2022 at 4:00 p.m. (Prevailing Eastern Time)
Hearing Date and Time: July 20, 2022 at 11:00 a.m. (Prevailing Eastern Time)

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**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	

**GUC RECOVERY TRUSTEE'S FOURTEENTH OMNIBUS
OBJECTION TO INDIVIDUAL PENSION CLAIMS FILED BY
JEANNE M. BENSON, BETTIE DOWNING, AND DEHLIA LACASSE**

THIS FOURTEENTH OMNIBUS OBJECTION SEEKS TO DISALLOW AND EXPUNGE INDIVIDUAL PENSION CLAIMS OF JEANNIE BENSON, BETTIE DOWNING, AND DEHLIA LACASSE. PARTIES RECEIVING THIS OBJECTION SHOULD REVIEW THE OBJECTION AND SCHEDULE 1 ATTACHED THERETO 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 JCK Legacy 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*

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. (SUZ1). 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.



JCK Legacy Company and its affiliated Debtors and Debtors in Possession (the “**Plan**”) [Docket No. 879], by and through undersigned counsel, files this fourteenth omnibus objection (the “**GUC Recovery Trustee’s Fourteenth 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 A**, disallowing and expunging the claims identified on Schedule 1 to the GUC Recovery Trustee’s Fourteenth Omnibus Objection.

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.), as the deadline for creditors to file proofs of claim against the Debtors (the “**General Bar Date**”). 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, 503.

7. 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**”). The Plan and the 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; Trust Agreement, § 2.1; Plan, § 6.20.

8. 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, the 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).

A. Pension Plan and PBGC Allowed General Unsecured Claim

9. Prior to the Petition Date, the Debtors established and maintained The McClatchy Company Retirement Plan (the “**Pension Plan**”), a qualified single-employer defined benefit pension plan, pursuant to Title IV of the Employee Retirement Income Security Act of 1974 (“**ERISA**”), as amended, 29 U.S.C. §§ 1301-1461 (2018).

10. Effective as of August 31, 2020, the Pension Plan was terminated through an Agreement for Appointment of Trustee and Termination of Plan between the Debtors and the Pension Benefit Guaranty Corporation (“**PBGC**”). PBGC became the statutory trustee for the

Pension Plan on September 4, 2020. Under a settlement agreement between the GUC Recovery Trustee and PBGC (the “**Parties**”), PBGC holds an allowed general unsecured claim in the amount of \$905,231,226 (the “**Allowed Claim**”), which superseded amended Proofs of Claim Nos. 2666, 2667, and 2689 filed by PBGC for unfunded benefit liabilities, minimum funding contributions, and termination premiums (the “**PBGC Claims**”). *See* Docket Nos. 1321, 1345.

B. Individual Pension Claims

a. *Jeanne M. Benson*

11. On February 7, 2022, Jeanne M. Benson filed Proof of Claim No. 2723 in the amount of \$24,000 based on benefits under the Pension Plan. A copy of Proof of Claim No. 2723 is attached as **Exhibit B.**

b. *Dehlia LaCasse*

12. On May 14, 2022, Dehlia LaCasse filed Proof of Claim No. 2727 in the amount of \$9,301 based on services performed. A copy of Proof of Claim No. 2727 is attached as **Exhibit C.**

c. *Bettie Downing*

13. On May 24, 2022, Bettie Downing filed Proof of Claim No. 2728 (together with Proofs of Claim Nos. 2723 and 2727, the “**Claims**”) for an unliquidated amount based on benefits under the Pension Plan. A copy of Proof of Claim No. 2728 is attached as **Exhibit D.**

14. To avoid duplicate payments on pension claims, the GUC Recovery Trustee reviewed the confidential individual list of pensioners under the Pension Plan and found that the claimants are qualified pensioners under the Pension Plan. The GUC Recovery Trustee also reviewed the service list of the Bar Date Order and discovered that the claimants received notice of the Bar Date. *See* Docket No. 503.

RELIEF REQUESTED

15. 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 the claims identified on Schedule 1 to the GUC Recovery Trustee's Fourteenth Omnibus Objection because the Claims are untimely and ERISA gives PBGC the exclusive authority to assert a claim on account of benefits owed under a qualified single-employer plan such as the Pension Plan.

BASIS FOR RELIEF

16. Section 502 of the Bankruptcy Code governs the allowance and disallowance of claims. 11 U.S.C. § 502. Generally, a filed claim is deemed allowed unless a party in interest objects. 11 U.S.C. § 502(a). If an objection is filed, section 502(b) requires the Court to determine the amount of the claim and allow it, unless the claim falls in one of the enumerated categories under sections 502(b)(1)-(9). *See* 11 U.S.C. § 502(b). Among other provisions, section 502(b) provides for disallowance of claims that are “unenforceable against the debtor and property of the debtor . . . under . . . applicable law for a reason other than because such claim is contingent or unmatured” and that are “not timely filed.” 11 U.S.C. §§ 502(b)(1), (9).

17. The objecting party has the initial “burden of putting forth evidence sufficient to refute the validity of the claim.” *In re Metex Mfg. Corp.*, 510 B.R. 735, 740 (Bankr. S.D.N.Y. 2014) (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.*, No. 12 Civ. 6074 (RJS), 2013 WL 5549643, at *3 (S.D.N.Y. Sep. 26, 2013)).

A. The Claims Should Be Disallowed Because PBGC Has Exclusive Authority To Assert Pension Claims For Qualified Beneficiaries Under the Pension Plan

a. Exclusive Authority of PBGC to Collect Pension Claims after Plan Termination

18. Section 1362 provides that pension plan sponsors are liable to PBGC for “the total amount of the unfunded benefit liabilities (as of the plan termination date) to all participants and beneficiaries under the plan,” plus interest calculated from the plan termination date. 29 U.S.C. § 1362(b)(1)(A). The provision gives PBGC exclusive authority to collect all amounts owed to plan participants following termination of a single-employer plan such as the Pension Plan. *See In re Rhodes, Inc.*, 382 B.R. 550, 553 (Bankr. N.D. Ga. 2008) (plan sponsors of terminated pension benefit plans are liable to PBGC for the total amount of the unfunded benefit liabilities).

19. After payment of unfunded benefit liabilities owed to PBGC, section 1322(c)(1) of ERISA requires PBGC to allocate the funds received to each beneficiary of a terminated single-employer plan based on a priority scheme provided for under section 1344(a) of ERISA. *See* 29 U.S.C. §§ 1322(c)(1) and 1344(a).

b. Disallowance of the Claims Identified on Schedule I

20. The Claims should be disallowed and expunged because the claimants are qualified pensioners under the Pension Plan. Qualified pensioners are not entitled to a claim against the Debtors’ estate on an individual basis.

21. As noted, PBGC became statutory trustee of the Pension Plan after it was terminated. As statutory trustee, ERISA gives PBGC exclusive authority to assert claims on account of benefits owed under the Pension Plan. PBGC filed the PBGC Claims, which have now been superseded by the Allowed Claim agreed to by the Parties and approved by the Court. *See* Docket No. 1345. Because all pension benefit claims are vested in PBGC under ERISA following termination of the Pension Plan, the claimants are not entitled to a claim against the

estate on an individual basis. *See, e.g., In re JCK Legacy Co. et al.*, Case No. 20-10418 (MEW) (Bankr. S.D.N.Y. Dec. 22, 2020) (Dkt. Nos. 1062, 1063, 1064) (granting omnibus objections to pension claims filed by individual qualified pensioners under the Pension Plan); *In re JCK Legacy Co. et al.*, Case No. 20-10418 (MEW) (Bankr. S.D.N.Y. Mar. 16, 2022) (Dkt. No. 1428) (granting GUC Recovery Trustee's twelfth omnibus objection to pension claims filed by individual qualified pensioners under the Pension Plan).

B. The Claims Are Untimely Because They Were Filed After The General Bar Date

22. Bankruptcy Rule 3003(c) permits the Court to set a bar date for creditors to file a proof of claim. Fed. R. Bankr. P. 3003(c). Bar dates are “critically important to the administration of a successful chapter 11 case.” *In re Musicland Holdings Corp.*, 356 B.R. 603, 607 (Bankr. S.D.N.Y. 2006). The Court entered the Bar Date Order, which set July 10, 2020 as deadline for creditors to file a proof of claim, or forever be barred in asserting a claim against the Debtors. Section 8.4 of the Plan states that “all proofs of claim filed after the applicable deadline for filing such proofs of claim shall be deemed disallowed and expunged as of the Effective Date without any further notice to, or action, order, or approval of the Bankruptcy Court.” Plan, § 8.4.

23. The Claims should be disallowed and expunged because they were filed after the General Bar Date. Also, none of the Claims are subject to any exception that may render such claims timely under the Bar Date Order, including: (a) claims arising from the rejection of an executory contract or unexpired lease; (b) claims filed by an entity subject to the Governmental Bar Date (as defined in the Bar Date Order); or (c) the filing of claims extended beyond the General Bar Date by court order or agreement. *See* Bar Date Order at ¶¶ 12, 14.

24. For the foregoing reasons, the GUC Recovery Trustee requests that the Claims identified on Schedule 1 to the GUC Recovery Trustee's Fourteenth Omnibus Objection be disallowed and expunged in their entirety because the Claims are untimely and PBGC has exclusive authority to recover claims on behalf of qualified beneficiaries under the Pension Plan.

NOTICE

25. Notice of the GUC Recovery Trustee's Fourteenth 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 PBGC and the individuals identified on Schedule 1 to the GUC Recovery Trustee's Fourteenth Omnibus Objection. 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 A**: (a) disallowing and expunging Proofs of Claim Nos. 2723, 2727, and 2728 identified on Schedule 1 to the GUC Recovery Trustee's Fourteenth Omnibus Objection; (b) granting such other and further relief as the Court deems just and proper.

Dated: June 16, 2022
New York, New York

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

Response Deadline: July 13, 2022 at 4:00 p.m. (Prevailing Eastern Time)
Hearing Date and Time: July 20, 2022 at 11:00 a.m. (Prevailing Eastern Time)

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**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	

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

THIS FOURTEENTH OMNIBUS OBJECTION SEEKS TO DISALLOW AND EXPUNGE INDIVIDUAL PENSION CLAIMS OF JEANNE M. BENSON, BETTIE DOWNING, AND DEHLIA LACASSE. PARTIES RECEIVING THIS OBJECTION SHOULD REVIEW THE OBJECTION AND SCHEDULE 1 ATTACHED THERETO 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, filed the *GUC Recovery Trustee's Fourteenth Omnibus Objection to Individual Pension Claims Filed By Jeanne M. Benson, Bettie Downing, and Dehlia*

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. (SUZ1). 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.

LaCasse (the “**GUC Recovery Trustee’s Fourteenth Omnibus Objection**”) with the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”).

PLEASE TAKE FURTHER NOTICE that any response to the GUC Recovery Trustee’s Fourteenth Omnibus Objection must be filed on or before **July 13, 2022 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., 1201W. 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 DSI Consulting, Inc., 110 East 42nd Street, Suite 1818, New York, New York 10017 Attn.: William A. Brandt., Jr. (bbrandt@DSIconsulting.com);
- (e) 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
- (f) 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 Fourteenth Omnibus Objection shall be held **telephonically via Court Solutions LLC on July 20, 2022 at 11:00 a.m. (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 Fourteenth Omnibus Objection without further notice or a hearing.

Dated: June 16, 2022
New York, New York

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

Schedule 1

Individual Pension Claims

Name of Claimant	Date Filed	Proof of Claim No.	Proof of Claim Amount	Reason for Disallowance
Jeanne M. Benson	02/07/2022	2723	\$24,000	Claim was filed after the General Bar Date and is based on benefits owed under the McClatchy Company Retirement Plan, a qualified single-employer defined benefit pension plan
Dehlia LaCasse	05/14/2022	2727	\$9,301.00	Claim was filed after the General Bar Date and is based on benefits owed under the McClatchy Company Retirement Plan, a qualified single-employer defined benefit pension plan
Bettie Downing	05/24/2022	2728	Unliquidated	Claim was filed after the General Bar Date and is based on benefits owed under the McClatchy Company Retirement Plan, a qualified single-employer defined benefit pension plan

Exhibit A

Proposed Order

**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	

**ORDER GRANTING GUC RECOVERY TRUSTEE'S FOURTEENTH
OMNIBUS OBJECTION TO INDIVIDUAL PENSION CLAIMS FILED
BY JEANNE M. BENSON, BETTIE DOWNING, AND DEHLIA LACASSE**

Upon consideration of the *GUC Recovery Trustee's Fourteenth Omnibus Objection to Individual Pension Claims Filed By Jeanne M. Benson, Bettie Downing, and Dehlia LaCasse* (the "**GUC Recovery Trustee's Fourteenth Omnibus Objection**") to disallow and expunge the claims identified on Schedule 1 to the GUC Recovery Trustee's Fourteenth Omnibus Objection; and the Court having jurisdiction under 28 U.S.C. §§ 157 and 1334 to consider the GUC Recovery Trustee's Fourteenth Omnibus Objection and relief requested; and the GUC Recovery Trustee's Fourteenth 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 Fourteenth Omnibus Objection having been provided; and it appearing that no other notice is needed; and such relief being in the best interests of the Debtors' estates and their creditors, and the GUC Recovery Trust²; and the Court having considered all papers submitted; and for good cause shown;

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. (SUZ1). 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 Fourteenth Omnibus Objection.

It is hereby **ORDERED** that:

1. The GUC Recovery Trustee's Fourteenth Omnibus Objection is **SUSTAINED** to the extent set forth herein.
2. The claims identified on Schedule 1 to the GUC Recovery Trustee's Fourteenth Omnibus Objection are disallowed and expunged in their entirety.
3. 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.
4. The Court shall retain jurisdiction over any matter arising from or related to the implementation of this Order.

Dated: July ___, 2022
New York, NY

Michael E. Wiles
United States Bankruptcy Judge

Exhibit B

Proof of Claim No. 2723

Fill in this information to identify the case:

Debtor The Bradenton Herald, Inc.

United States Bankruptcy Court for the: Southern District of New York
(State)

Case number 20-10462

Official Form 410 Proof of Claim

04/19

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor?	<u>jeanne benson</u> <small>Name of the current creditor (the person or entity to be paid for this claim)</small> <small>Other names the creditor used with the debtor</small> _____		
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____		
3. Where should notices and payments to the creditor be sent?	Where should notices to the creditor be sent? See summary page Federal Rule of Bankruptcy Procedure (FRBP) 2002(g) Contact phone <u> </u> Contact email <u> </u>	Where should payments to the creditor be sent? (if different) Contact phone <u> </u> Contact email <u> </u>	Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on <u> </u> <div style="text-align: right; font-size: small;">MM / DD / YYYY</div>		
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____		



Part 2: Give Information About the Claim as of the Date the Case Was Filed

6.	Do you have any number you use to identify the debtor?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: ____
7.	How much is the claim? \$ <u>24000</u>	Does this amount include interest or other charges? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).
8.	What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information. <u>Services performed- employee participant in pension plan</u>	
9.	Is all or part of the claim secured? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. The claim is secured by a lien on property. Nature or property: <input type="checkbox"/> Real estate: If the claim is secured by the debtor's principle residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i> . <input type="checkbox"/> Motor vehicle <input type="checkbox"/> Other. Describe: _____ Basis for perfection: _____ Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.) Value of property: \$ _____ Amount of the claim that is secured: \$ _____ Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amount should match the amount in line 7.) Amount necessary to cure any default as of the date of the petition: \$ _____ Annual Interest Rate (when case was filed) _____ % <input type="checkbox"/> Fixed <input type="checkbox"/> Variable	
10.	Is this claim based on a lease? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Amount necessary to cure any default as of the date of the petition. \$ _____	
11.	Is this claim subject to a right of setoff? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Identify the property: _____	



<p>12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?</p> <p>A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.</p>	<div style="display: flex; justify-content: space-between;"> <div> <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Check all that apply: </div> <div style="text-align: right; background-color: #f2f2f2; padding: 2px 5px; font-weight: bold;">Amount entitled to priority</div> </div> <div style="margin-top: 10px;"> <div style="display: flex; justify-content: space-between; align-items: flex-start;"> <div style="width: 70%;"> <input type="checkbox"/> Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). </div> <div style="width: 25%; text-align: right;">\$ _____</div> </div> <div style="display: flex; justify-content: space-between; align-items: flex-start; margin-top: 5px;"> <div style="width: 70%;"> <input type="checkbox"/> Up to \$3,025* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7). </div> <div style="width: 25%; text-align: right;">\$ _____</div> </div> <div style="display: flex; justify-content: space-between; align-items: flex-start; margin-top: 5px;"> <div style="width: 70%;"> <input type="checkbox"/> Wages, salaries, or commissions (up to \$13,650*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4). </div> <div style="width: 25%; text-align: right;">\$ _____</div> </div> <div style="display: flex; justify-content: space-between; align-items: flex-start; margin-top: 5px;"> <div style="width: 70%;"> <input type="checkbox"/> Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8). </div> <div style="width: 25%; text-align: right;">\$ _____</div> </div> <div style="display: flex; justify-content: space-between; align-items: flex-start; margin-top: 5px;"> <div style="width: 70%;"> <input type="checkbox"/> Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5). </div> <div style="width: 25%; text-align: right;">\$ _____</div> </div> <div style="display: flex; justify-content: space-between; align-items: flex-start; margin-top: 5px;"> <div style="width: 70%;"> <input type="checkbox"/> Other. Specify subsection of 11 U.S.C. § 507(a)() that applies. </div> <div style="width: 25%; text-align: right;">\$ _____</div> </div> </div> <p style="font-size: small; margin-top: 10px;">* Amounts are subject to adjustment on 4/01/22 and every 3 years after that for cases begun on or after the date of adjustment.</p>
<p>13. Is all or part of the claim pursuant to 11 U.S.C. § 503(b)(9)?</p>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Indicate the amount of your claim arising from the value of any goods received by the debtor within 20 days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim. <div style="text-align: right;">\$ _____</div>

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

- ☒ I am the creditor.
☐ I am the creditor's attorney or authorized agent.
☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.
☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 02/07/2022
MM / DD / YYYY

/s/jeanne benson
Signature

Print the name of the person who is completing and signing this claim:

Name jeanne benson
First name Middle name Last name

Title self

Company _____
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address _____

Contact phone _____ Email _____



For phone assistance: Domestic (877) 634-7166 | International 001-310-823-9000

Debtor: 20-10462 - The Bradenton Herald, Inc. District: Southern District of New York, New York Division		
Creditor: jeanne benson jeanne benson 102 south woodbine road st joseph, Missouri, 64506 United States Phone: 9412246592 Phone 2: Fax: Email: ladyjinne@yahoo.com	Has Supporting Documentation: Yes, supporting documentation successfully uploaded Related Document Statement:	
	Has Related Claim: No Related Claim Filed By:	
	Filing Party: Creditor	
Other Names Used with Debtor:	Amends Claim: No Acquired Claim: No	
Basis of Claim: Services performed- employee participant in pension plan	Last 4 Digits: No	Uniform Claim Identifier:
Total Amount of Claim: 24000	Includes Interest or Charges: No	
Has Priority Claim: No	Priority Under:	
Has Secured Claim: No Amount of 503(b)(9): No Based on Lease: No Subject to Right of Setoff: No	Nature of Secured Amount: Value of Property: Annual Interest Rate: Arrearage Amount: Basis for Perfection: Amount Unsecured:	
Submitted By: jeanne benson on 07-Feb-2022 11:45:04 a.m. Eastern Time Title: self Company:		



**The McClatchy Company Retirement Plan
Pension Estimate Request Form**

Employee Information

Spouse Information

Name: Jeanne Benson Name: _____

Last 4 #s of your SSN: XXX-XXX- [REDACTED]

Date of Birth: [REDACTED] Date of Birth: _____

Pension estimates will include all payment options available to you. If you are married, joint and survivor annuity estimates assume your spouse is the beneficiary. If you meet early retirement eligibility requirements, the earliest retirement age is the first of the month following your 55th birthday. Former Knight Ridder pension plan participants must have earned a minimum of 10-15 years of vesting service to be eligible for early retirement. You were credited with one year of vesting service for each calendar year in which you worked a minimum of 1,000 hours. If you are no longer employed with McClatchy, you must begin your benefit payments the first of the month following your 65th birthday.

Payment Begin Date (mm/yyyy): FEB 5, 2022

Payment Begin Date (mm/yyyy): _____

I understand it will take 2-3 weeks for my estimate(s). Please send my pension estimate(s)

by email to: [REDACTED] or mail to me at the following address: [REDACTED]

If you want your estimates mailed to your home, please print your address above

Jeanne Benson
Employee Signature

6-14-2020
Date

Every effort is made to ensure that pension estimates are correct. If a mistake is made, the pension plan administrator reserves the right to correct any errors.

In order to start your pension benefit payments before age 65, you must contact McClatchy 90 days prior to the date you want your payments to begin. To request pension benefit election forms, please call 1-866-334-2337 or email pensions@mcclatchy.com.

Exhibit C

Proof of Claim No. 2727

Fill in this information to identify the case:

Debtor The McClatchy Company

United States Bankruptcy Court for the: Southern District of New York
(State)

Case number 20-10418

Official Form 410
Proof of Claim

04/19

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor?	<u>Dehlia LaCasse</u> Name of the current creditor (the person or entity to be paid for this claim)	
	Other names the creditor used with the debtor _____	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Where should notices and payments to the creditor be sent?	Where should notices to the creditor be sent? <u>Dehlia LaCasse</u> <u>2713 Alysheba Ave</u> <u>Modesto, CA 95355-8435</u>	Where should payments to the creditor be sent? (if different)
Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Contact phone <u>[REDACTED]</u> Contact email <u>[REDACTED]</u>	Contact phone _____ Contact email _____
	Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____	
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY	
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	



Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: _____
7. How much is the claim?	\$ <u>9301.00</u> . Does this amount include interest or other charges? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).
8. What is the basis of the claim?	Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information. <u>Services Performed</u>
9. Is all or part of the claim secured?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. The claim is secured by a lien on property. Nature or property: <input type="checkbox"/> Real estate: If the claim is secured by the debtor's principle residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i> . <input type="checkbox"/> Motor vehicle <input type="checkbox"/> Other. Describe: _____ Basis for perfection: _____ Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.) Value of property: \$ _____ Amount of the claim that is secured: \$ _____ Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amount should match the amount in line 7.) Amount necessary to cure any default as of the date of the petition: \$ _____ Annual Interest Rate (when case was filed) _____ % <input type="checkbox"/> Fixed <input type="checkbox"/> Variable
10. Is this claim based on a lease?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Amount necessary to cure any default as of the date of the petition. \$ _____
11. Is this claim subject to a right of setoff?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Identify the property: _____



<p>12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?</p> <p>A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.</p>	<div style="display: flex; justify-content: space-between;"> <div> <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Check all that apply: </div> <div style="text-align: right; background-color: #f2f2f2; padding: 5px;"> Amount entitled to priority </div> </div> <div style="margin-top: 10px;"> <div style="display: flex; justify-content: space-between;"> <input type="checkbox"/> Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). <div style="text-align: right;">\$ _____</div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <input type="checkbox"/> Up to \$3,025* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7). <div style="text-align: right;">\$ _____</div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <input type="checkbox"/> Wages, salaries, or commissions (up to \$13,650*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4). <div style="text-align: right;">\$ _____</div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <input type="checkbox"/> Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8). <div style="text-align: right;">\$ _____</div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <input type="checkbox"/> Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5). <div style="text-align: right;">\$ _____</div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <input type="checkbox"/> Other. Specify subsection of 11 U.S.C. § 507(a)() that applies. <div style="text-align: right;">\$ _____</div> </div> </div> <p style="font-size: small; margin-top: 10px;">* Amounts are subject to adjustment on 4/01/22 and every 3 years after that for cases begun on or after the date of adjustment.</p>
<p>13. Is all or part of the claim pursuant to 11 U.S.C. § 503(b)(9)?</p>	<div> <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Indicate the amount of your claim arising from the value of any goods received by the debtor within 20 days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim. </div> <div style="margin-top: 10px;"> \$ _____ </div>

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

- ☒ I am the creditor.
- ☐ I am the creditor's attorney or authorized agent.
- ☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.
- ☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 05/14/2022
MM / DD / YYYY

/s/DehLia Lacasse
Signature

Print the name of the person who is completing and signing this claim:

Name DehLia Lacasse
First name Middle name Last name

Title _____

Company _____
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address _____

Contact phone _____ Email _____



For phone assistance: Domestic (877) 634-7166 | International 001-310-823-9000

Debtor: 20-10418 - The McClatchy Company District: Southern District of New York, New York Division		
Creditor: Dehlia LaCasse 2713 Alysheba Ave Modesto, CA, 95355-8435 Phone: 2095740822 Phone 2: Fax: Email: deelacasse@yahoo.com	Has Supporting Documentation: Yes, supporting documentation successfully uploaded Related Document Statement:	
	Has Related Claim: No Related Claim Filed By:	
	Filing Party: Creditor	
Other Names Used with Debtor:	Amends Claim: No Acquired Claim: No	
Basis of Claim: Services Performed	Last 4 Digits: No	Uniform Claim Identifier:
Total Amount of Claim: 9301.00	Includes Interest or Charges: No	
Has Priority Claim: No	Priority Under:	
Has Secured Claim: No Amount of 503(b)(9): No Based on Lease: No Subject to Right of Setoff: No	Nature of Secured Amount: Value of Property: Annual Interest Rate: Arrearage Amount: Basis for Perfection: Amount Unsecured:	
Submitted By: Dehlia Lacasse on 14-May-2022 6:39:53 p.m. Eastern Time Title: Company:		


McCLATCHY

LaCasse, Dehlia

05/01/2020

03/10/2020

Dehlia LaCasse
2713 Alysheba Ave
Modesto, CA 95355

Dear Dehlia LaCasse:

We have enclosed a package of information to help you understand your McClatchy pension benefit. This package includes:

- A "Summary of Payment Options," which shows the amount of your pension benefits(s) payable from pension plan(s) administered by The McClatchy Company and also serves as your payment election form.
- Other information and forms (e.g., tax-withholding forms) that you need to complete before your pension benefit payment can be processed.

YOUR PERSONAL INFORMATION

The pension benefit amounts shown on the "Summary of Payment Options" were calculated using the following personal information:

Date of Birth	[REDACTED]
Last Date of Employment	10/15/2010
Benefit Commencement Date	05/01/2020
Marital Status	Unmarried
Joint Annuitant's/Beneficiary's Date of Birth	N/A

Please carefully review the above information. If any of the information is incorrect, immediately notify The McClatchy Company. Any incorrect information could affect your pension benefit payment. The Plan reserves the right to correct this information and recalculate your benefit amounts.

To receive your Plan benefit, you must elect the form of payment. Your annuity election must be made no earlier than 90 days nor less than 30 days before the requested Benefit Commencement Date. You may waive the 30 day notice, but there is still a minimum seven days notice requirement.

IMPORTANT REMINDERS

As you review this retirement package, please keep the following points in mind:

- If a Qualified Domestic Relations Order ("QDRO") exists, a portion of your pension benefit may be

Social Security Administration

Potential Private Retirement Benefit Information

DEHLIA J LACASSE
2713 ALYSHEBA AVE
MODESTO CA

Social Security Number: [REDACTED]

Name: D. LACASSE

We are writing to tell you that you, or the worker whose Social Security number appears at the top of this form, MAY be entitled to some retirement benefits from a private employer. Also, your family, or the worker's family, may be entitled to retirement or survivor benefits.

These Are Not Social Security Benefits

These potential benefits are NOT Social Security benefits. We do not make any decisions about the payment of these benefits. Please see below for basic information about these retirement benefits.

Information About Retirement Benefits

You have, or the worker has, earned retirement benefits although no longer employed in a job covered by the retirement plan. These are called "deferred vested benefits." Private retirement plan administrators must provide information about such benefits to us through the Internal Revenue Service. We provide this reported information about the retirement plan when the individual asks for it or when a claim is filed for Social Security benefits. Social Security does not have any information about the benefits other than what appears below.

If You Want to Apply for These Benefits

If you want to apply for these retirement benefits or have any questions, you should contact the Plan Administrator shown below. The Plan Administrator provided the information as of the date in the "Year Reported" field below. If you or the worker has already filed a claim and received payment from the plan below, you may not be eligible for any additional benefits. Include a copy of this notice when you contact the Plan Administrator.

Plan Name THE MCCLATCHY COMPANY 401 K PLAN	Plan Number [REDACTED]	
	Identification Number 	
Plan Administrator and Address THE MCCLATCHY COMPANY RETIREMENT COMMITTEE P.O. BOX 15779 SACRAMENTO CA 958520779	Year Reported 2011	Estimated Amount
	Type of Benefit A	Payment Frequency A
	Units or Shares 	Value of Account \$9,301

IMPORTANT: See the other side of this page for an explanation of this information.

For SSA Use Only: [REDACTED]

Exhibit D

Proof of Claim No. 2728

United States Bankruptcy Court for the Southern District of New York

Indicate Debtor against which you assert a claim by checking the appropriate box below. (Check only one Debtor per claim form.)

- | | | |
|---|---|--|
| <input type="checkbox"/> The McClatchy Company (Case No. 20-10418) | <input type="checkbox"/> Macon Telegraph Publishing Company (Case No. 20-10436) | <input type="checkbox"/> Oak Street Redevelopment Corporation (Case No. 20-10888) |
| <input type="checkbox"/> Aboard Publishing, Inc. (Case No. 20-10419) | <input type="checkbox"/> Mail Advertising Corporation (Case No. 20-10437) | <input type="checkbox"/> Olympian Publishing, LLC (Case No. 20-10455) |
| <input type="checkbox"/> Bellingham Herald Publishing, LLC (Case No. 20-10420) | <input type="checkbox"/> McClatchy Big Valley, Inc. (Case No. 20-10438) | <input type="checkbox"/> Olympic-Cascade Publishing, Inc. (Case No. 20-10456) |
| <input type="checkbox"/> Belton Publishing Company, Inc. (Case No. 20-10421) | <input type="checkbox"/> McClatchy Interactive LLC (Case No. 20-10439) | <input type="checkbox"/> Pacific Northwest Publishing Company, Inc. (Case No. 20-10457) |
| <input type="checkbox"/> Biscayne Bay Publishing, Inc. (Case No. 20-10422) | <input type="checkbox"/> McClatchy Interactive West (Case No. 20-10440) | <input type="checkbox"/> Quad County Publishing, Inc. (Case No. 20-10458) |
| <input type="checkbox"/> Cass County Publishing Company (Case No. 20-10423) | <input type="checkbox"/> McClatchy International Inc. (Case No. 20-10441) | <input type="checkbox"/> San Luis Obispo Tribune, LLC (Case No. 20-10459) |
| <input type="checkbox"/> Columbus-Ledger Enquirer, Inc. (Case No. 20-10424) | <input type="checkbox"/> McClatchy Investment Company (Case No. 20-10442) | <input type="checkbox"/> Star-Telegram, Inc. (Case No. 20-10460) |
| <input type="checkbox"/> Cypress Media, Inc. (Case No. 20-10417) | <input type="checkbox"/> McClatchy Management Services, Inc. (Case No. 20-10443) | <input type="checkbox"/> Tacoma News, Inc. (Case No. 20-10461) |
| <input type="checkbox"/> Cypress Media, LLC (Case No. 20-10425) | <input type="checkbox"/> McClatchy News Services, Inc. (Case No. 20-10445) | <input checked="" type="checkbox"/> The Bradenton Herald, Inc. (Case No. 20-10462) |
| <input type="checkbox"/> East Coast Newspapers, Inc. (Case No. 20-10426) | <input type="checkbox"/> McClatchy Newspapers, Inc. (Case No. 20-10444) | <input type="checkbox"/> The Charlotte Observer Publishing Company (Case No. 20-10463) |
| <input type="checkbox"/> El Dorado Newspapers (Case No. 20-10427) | <input type="checkbox"/> McClatchy Property, Inc. (Case No. 20-10446) | <input type="checkbox"/> The News & Observer Publishing Co. (Case No. 20-10464) |
| <input type="checkbox"/> Gulf Publishing Company, Inc. (Case No. 20-10428) | <input type="checkbox"/> McClatchy Resources, Inc. (Case No. 20-10447) | <input type="checkbox"/> The State Media Company (Case No. 20-10465) |
| <input type="checkbox"/> Herald Custom Publishing of Mexico, S. de R.L. de C.V. (Case No. 20-10429) | <input type="checkbox"/> McClatchy Shared Services, Inc. (Case No. 20-10448) | <input type="checkbox"/> The Sun Publishing Company, Inc. (Case No. 20-10466) |
| <input type="checkbox"/> HLB Newspapers, Inc. (Case No. 20-10430) | <input type="checkbox"/> McClatchy U.S.A., Inc. (Case No. 20-10449) | <input type="checkbox"/> Tribune Newsprint Company (Case No. 20-10467) |
| <input type="checkbox"/> Idaho Statesman Publishing, LLC (Case No. 20-10431) | <input type="checkbox"/> Miami Herald Media Company (Case No. 20-10450) | <input type="checkbox"/> Tru Measure, LLC (Case No. 20-10468) |
| <input type="checkbox"/> Kaitatim Publishing Company, Inc. (Case No. 20-10432) | <input type="checkbox"/> N & O Holdings, Inc. (Case No. 20-10451) | <input type="checkbox"/> Wichita Eagle and Beacon Publishing Company, Inc. (Case No. 20-10469) |
| <input type="checkbox"/> Keynote Publishing Company, Inc. (Case No. 20-10433) | <input type="checkbox"/> Newsprint Ventures, Inc. (Case No. 20-10452) | <input type="checkbox"/> Wingate Paper Company (Case No. 20-10470) |
| <input type="checkbox"/> Lee's Summit Journal, Incorporated (Case No. 20-10434) | <input type="checkbox"/> Nitany Printing and Publishing Company (Case No. 20-10453) | |
| <input type="checkbox"/> Lexington H.L. Services, Inc. (Case No. 20-10435) | <input type="checkbox"/> Nor-Tex Publishing, Inc. (Case No. 20-10454) | |

Official Form 410

Proof of Claim

04/19

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Other than a claim under 11 U.S.C. § 503(b)(9), this form should not be used to make a claim for an administrative expense arising after the commencement of the case.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed.

Part 1 Identify the Claim

NameID: 14054058

1. Who is the current creditor?	Bettie Downing Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom?	
3. Where should notices and payments to the creditor be sent?	Where should notices to the creditor be sent? Bettie Downing 5707 45th St East Lot 280 Bradenton, FL 34203-6510	Where should payments to the creditor be sent? (if different) Bettie Downing Name 5707 45th St E Lot 280 Number Street Bradenton FL 34203 City State ZIP Code USA Country Contact phone Contact email
Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Address Contact phone Contact email	Uniform claim identifier for electronic payments in chapter 13 (if you use one):
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) Filed on MM / DD / YYYY	
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing?	



RECEIVED

MAY 24 2022

KURTZMAN CARSON CONSULTANTS

Part 2: Give Information About the Claim as of the Date the Case Was Filed Pg 3 of 6

6. Do you have any number you use to identify the debtor?

☐ No

☐ Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor:

DEBTOR'S TIN

7. How much is the claim?

\$ 3016.20 YEARLY Does this amount include interest or other charges?

☐ No

☒ Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim?

Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.

Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).

Limit disclosing information that is entitled to privacy, such as health care information.

Pension from Bradenton Herald

9. Is all or part of the claim secured?

No

☒ Yes. The claim is secured by a lien on property.

Nature of property:

☐ Real estate: If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.

☐ Motor vehicle

☒ Other. Describe:

HELD IN TRUST BY PENSIONER

Basis for perfection:

Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)

Value of property:

\$ 3016.20 YEARLY

Amount of the claim that is secured:

\$

Amount of the claim that is unsecured:

\$ (The sum of the secured and unsecured amount should match the amount in line 7.)

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MAY 24 2022

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Amount necessary to cure any default as of the date of the petition: \$

Annual Interest Rate (when case was filed) %

☐ Fixed

☐ Variable

10. Is this claim based on a lease?

☒ No

☐ Yes. Amount necessary to cure any default as of the date of the petition.

\$

11. Is this claim subject to a right of setoff?

☒ No

☐ Yes. Identify the property:



12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

☐ No

☒ Yes. Check all that apply:

Amount entitled to priority

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

\$ _____

☐ Up to \$3,025* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

\$ _____

☐ Wages, salaries, or commissions (up to \$13,650*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

\$ _____

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

\$ _____

☒ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

\$ 3,016.20 Annually

☐ Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.

\$ _____

* Amounts are subject to adjustment on 4/01/22 and every 3 years after that for cases begun on or after the date of adjustment.

13. Is all or part of the claim pursuant to 11 U.S.C. § 503(b)(9)?

☐ No

☒ Yes. Indicate the amount of your claim arising from the value of any goods received by the debtor within 20 days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim.

\$ 3016.20 Annually

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

☒ I am the creditor.

☐ I am the creditor's attorney or authorized agent.

☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 5/18/22
MM DD / YYYY

Signature

Print the name of the person who is completing and signing this claim:

Name

First name

Middle name

Last name

Title

Company

Address

Number

Street

City

State

ZIP Code

Country

Contact phone

Email

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MAY 24 2022

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The McClatchy Company, et al.
c/o KCC
222 N Pacific Coast Highway, Ste. 300
El Segundo, CA 90245

005698

2010418200524025837006503



PRF #: 108931 | Case No.: 20-10418 | Svc. 2 | PackID: 5698 | NameID: 14054058

Bettie Downing
5707 45th St East Lot 280
Bradenton, FL 34203-6510

Your claim can be filed electronically on KCC's website at <https://epoc.kccllc.net/McClatchy>.

Your unique login information is:

ID: 24976593

PIN: V1BDqPqI

The Northern Trust Company
Benefit Payment Services
50 S LaSalle St. C2N
Chicago, IL 60603-1003



01071024236 089189 1 0110 34076 68155 1/1 BIN:0

BETTIE J DOWNING
5707 45TH ST EAST LOT 280
BRADENTON FL 34203-6510



☐ Corrected (if checked)

PAYER'S name, street address, city or town, state or province, country, ZIP or foreign postal code, and phone no. The Northern Trust Company Benefit Payment Services C-2N 50 S. LaSalle St. Chicago, Illinois 60603 As Paying Agent for: [REDACTED] MCCLATCHY MCCLATCHY KR		1 Gross distribution \$3,016.20		OMB No. 1545-0119 2020 Form 1099-R		Distributions From Pensions, Annuities, Retirement or Profit-Sharing Plans, IRAs, Insurance Contracts, etc. Copy B Report this income on your federal tax return. If this form shows federal income tax withheld in box 4, attach this copy to your return. This information is being furnished to the IRS.	
		2a Taxable amount \$3,016.20					
		2b Taxable amount not determined <input type="checkbox"/> Total distribution <input type="checkbox"/>					
		3 Capital gain (included in box 2a) \$0.00		4 Federal income tax withheld \$0.00			
PAYER'S TIN [REDACTED]		RECIPIENT'S TIN [REDACTED]		5 Employee contributions/ Designated Roth contributions or insurance premiums \$0.00		6 Net unrealized appreciation in employer's securities \$0.00	
RECIPIENT'S name, street address (including apt. no.), city or town, state or province, country, and ZIP or foreign postal code BETTIE J DOWNING 5707 45TH ST EAST LOT 280 BRADENTON FL 34203-6510				7 Distribution code(s) IRA/ SEP/ SIMPLE 7 <input type="checkbox"/>		8 Other \$0.00	
				9a Your percentage of total distribution 0%		9b Total employee contributions	
				10 Amount allocable to RRR within 5 years 0.00		11 1st year of desig. Roth contrib. <input type="checkbox"/>	
				12 FATCA filing requirement <input type="checkbox"/>		13 Date of payment	
Account number (see instructions) [REDACTED]		14 State tax withheld \$0.00		15 State/Payer's state no.		16 State distribution \$0.00	
				17 Local tax withheld \$0.00		18 Name of locality	
						19 Local distribution \$0.00	

Substitute Form 1099-R

☐ Corrected (if checked)

PAYER'S name, street address, city or town, state or province, country, ZIP or foreign postal code, and phone no. The Northern Trust Company Benefit Payment Services C-2N 50 S. LaSalle St. Chicago, Illinois 60603 As Paying Agent for: [REDACTED] MCCLATCHY MCCLATCHY KR		1 Gross distribution \$3,016.20		OMB No. 1545-0119 2020 Form 1099-R		Distributions From Pensions, Annuities, Retirement or Profit-Sharing Plans, IRAs, Insurance Contracts, etc. Copy C For Recipient's Records This information is being furnished to the IRS.	
		2a Taxable amount \$3,016.20					
		2b Taxable amount not determined <input type="checkbox"/> Total distribution <input type="checkbox"/>					
		3 Capital gain (included in box 2a) \$0.00		4 Federal income tax withheld \$0.00			
PAYER'S TIN [REDACTED]		RECIPIENT'S TIN [REDACTED]		5 Employee contributions/ Designated Roth contributions or insurance premiums \$0.00		6 Net unrealized appreciation in employer's securities \$0.00	
RECIPIENT'S name, street address (including apt. no.), city or town, state or province, country, and ZIP or foreign postal code BETTIE J DOWNING 5707 45TH ST EAST LOT 280 BRADENTON FL 34203-6510				7 Distribution code(s) IRA/ SEP/ SIMPLE 7 <input type="checkbox"/>		8 Other \$0.00	
				9a Your percentage of total distribution 0%		9b Total employee contributions	
				10 Amount allocable to RRR within 5 years 0.00		11 1st year of desig. Roth contrib. <input type="checkbox"/>	
				12 FATCA filing requirement <input type="checkbox"/>		13 Date of payment	
Account number (see instructions) [REDACTED]		14 State tax withheld \$0.00		15 State/Payer's state no.		16 State distribution \$0.00	
				17 Local tax withheld \$0.00		18 Name of locality	
						19 Local distribution \$0.00	

Substitute Form 1099-R