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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. 1508, 1509

**CERTIFICATE OF NO OBJECTION TO GUC RECOVERY TRUSTEE'S
MOTION TO ALLOW PROOF OF CLAIM NO. 2047 FILED BY HERNANDO
SANDOVAL, SOLELY FOR RECOVERY UNDER APPLICABLE INSURANCE**

The undersigned counsel to William A. Brandt, Jr., trustee (the "**GUC Recovery Trustee**") of the JCK GUC Recovery Trust established 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* [Docket No. 879], respectfully states:

1. On July 25, 2022, the GUC Recovery Trustee filed and served the *GUC Recovery Trustee's Motion to Allow Proof of Claim No. 2047 filed by Hernando Sandoval, Solely for Recovery under Applicable Insurance* (the "**Motion**") [Docket No. 1508]. In particular, the Motion

¹ The Debtors in these chapter 11 cases and the last four characters of each Debtor's tax identification number are: JCK Legacy Company (0478) and Herald Custom Publishing of Mexico, S. de R.L. de C.V. (5UZ1). The location of the GUC Recovery Trustee's service address for purposes of these chapter 11 cases is: 110 East 42 Street, Suite 1818 New York, NY 10017.



was served on counsel to Hernando Sandoval and counsel to Travelers Insurance Companies, Inc. via email and regular mail. *See* Docket No. 1509.

2. The Notice to the Motion stated that objections to the Motion were to be filed, served, and received no later than August 10, 2022 at 4:00 p.m. (ET).

3. The undersigned counsel certifies that no formal or informal objection to the Motion has been received. The undersigned counsel also certifies that he has reviewed the docket in this case and no objection to the Motion appears thereon.

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 an objection to the Motion.

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: August 12, 2022
New York, New York

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

Exhibit A

Proposed Order

**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 Nos. 1508, 1509

**ORDER GRANTING GUC RECOVERY TRUSTEE'S MOTION TO ALLOW
PROOF OF CLAIM NO. 2047 FILED BY HERNANDO SANDOVAL,
SOLELY FOR RECOVERY UNDER APPLICABLE INSURANCE**

Upon consideration of the Motion² to allow Proof of Claim No. 2047 solely for recovery under any applicable insurance; and a Certificate of No Objection to the Motion having been filed on August 12, 2022; and the Court having jurisdiction under 28 U.S.C. §§ 157 and 1334 to consider the Motion and relief requested; and the Motion 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 Motion 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 their creditors, and the GUC Recovery Trust; and the Court having considered all papers submitted; and for good cause shown:

It is hereby **ORDERED** that:

1. The Motion is **GRANTED** to the extent set forth herein.
2. Proof of Claim No. 2047 is allowed solely to the extent of recovery under any applicable insurance policy maintained by the Herald prior to the Petition Date.

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 Motion.

3. Mr. Sandoval shall not receive a distribution from assets of the GUC Recovery Trust, and the GUC Recovery Trustee is authorized to make distributions, if any, to beneficiaries of the GUC Recovery Trust without need to account for, or create a reserve for, the Claim.

4. This Order shall not prejudice Mr. Sandoval rights to pursue only the claims asserted in the Florida state court action against the Herald.

5. 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.

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

Dated: August ___, 2022
New York, NY

Michael E. Wiles
United States Bankruptcy Judge

Exhibit B

Blacklined Proposed Order

**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)
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**ORDER GRANTING GUC RECOVERY TRUSTEE'S MOTION TO ALLOW
PROOF OF CLAIM NO. 2047 FILED BY HERNANDO SANDOVAL,
SOLELY FOR RECOVERY UNDER APPLICABLE INSURANCE**

Upon consideration of the Motion² to allow Proof of Claim No. 2047 solely for recovery under any applicable insurance; [and a Certificate of No Objection to the Motion having been filed on August 12, 2022](#); and the Court having jurisdiction under 28 U.S.C. §§ 157 and 1334 to consider the Motion and relief requested; and the Motion 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 Motion 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 their creditors, and the GUC Recovery Trust; and the Court having considered all papers submitted; and for good cause shown:

It is hereby **ORDERED** that:

1. The Motion is **GRANTED** to the extent set forth herein.

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² Capitalized terms used and not otherwise defined herein shall have the meaning ascribed to them in the Motion.

2. Proof of Claim No. 2047 is allowed solely to the extent of recovery under any applicable insurance policy maintained by the Herald prior to the Petition Date.

3. Mr. Sandoval shall not receive a distribution from assets of the GUC Recovery Trust, and the GUC Recovery Trustee is authorized to make distributions, if any, to beneficiaries of the GUC Recovery Trust without need to account for, or create a reserve for, the Claim.

4. This Order shall not prejudice Mr. Sandoval rights to pursue only the claims asserted in the Florida state court action against the Herald.

5. 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.

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

Dated: August __, 2022
New York, NY

Michael E. Wiles
United States Bankruptcy Judge