

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

Medley LLC,¹

Debtor.

Chapter 11

Case No. 21-10526 (KBO)

Hearing Date: May 19, 2022 at 9:00 a.m. (ET)

Objection Deadline: April 22, 2022 at 4:00 p.m. (ET)

SECOND OMNIBUS (SUBSTANTIVE) OBJECTION OF THE
MEDLEY LLC LIQUIDATING TRUST TO CERTAIN NO LIABILITY CLAIMS

***CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE
THEIR NAMES AND CLAIMS IN THE EXHIBITS TO PROPOSED ORDER***

Saccullo Business Consulting, LLC, solely in its capacity as trustee (the “**Trustee**”) of the Medley LLC Liquidating Trust (the “**Trust**”) hereby files the attached *Second (Substantive) Objection of the Medley LLC Liquidating Trust to Certain No Liability Claims* (the “**Second Omnibus Objection**”) seeking entry of an order (the “**Proposed Order**”), substantially in the form attached hereto as **Exhibit 2**, pursuant to section 502 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 3007 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Rule 3007-1 of the Local Rules of Bankruptcy Practice and Procedures of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”) disallowing and expunging in full the no liability claims listed on **Exhibit A** thereto. In support of this Second Omnibus Objection, the Trust relies on the *Declaration of William Yip in Support of the Second Omnibus (Substantive) Objection of the Medley LLC Liquidating Trust to Certain No Liability Claims* (the “**Declaration**”), attached hereto as **Exhibit 1**. In further support of this Second Omnibus Objection, the Trust respectfully represents as follows:

¹ The Debtor’s current mailing address is c/o Medley LLC Liquidating Trust, c/o Saccullo Business Consulting, LLC, 27 Crimson King Drive, Bear, DE 19701.



JURISDICTION

1. The Court has jurisdiction to consider and determine this matter pursuant to 28 U.S.C. §§ 157 and 1334, the Amended Standing Order of Reference from the United States District Court for the District of Delaware, dated February 29, 2012. This is a core proceeding pursuant to 28 U.S.C. §§ 157(b)(1) and (b)(2)(A), (B) and (O). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory bases for the relief requested herein are section 502(b) of the Bankruptcy Code, Rules 3007 and 9014 of the Bankruptcy Rules, and Local Rule 3007-1.

3. Pursuant to Local Rule 9013-1(f), the Trust consents to the entry of a final judgment or order with respect to the Second Omnibus Objection if it is determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

BACKGROUND

A. The Chapter 11 Cases

4. On March 7, 2021 (the “**Petition Date**”), the Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code. From and after the Petition Date, the Debtor operated its business and managed its properties as a debtor-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code until the Effective Date (defined below).

5. On October 18, 2021, the Court entered an order (the “**Confirmation Order**”) confirming the *Modified Third Amended Combined Disclosure Statement and Chapter 11 Plan of Medley LLC* (the “**Plan**”).² The Plan became effective on October 18, 2021 (the “**Effective Date**”).³

² Docket No. 445.

³ Docket No. 449.

6. The Plan and Confirmation Order provide for the establishment of the Trust on the Effective Date according to the terms and conditions of the Liquidating Trust Agreement (the “**Trust Agreement**”), at which time the Trustee was appointed to administer the Trust. Pursuant to section VII.F of the Plan and section 3.2.9 of the Trust Agreement, the Trustee is authorized, among other things, to cause the Trust to investigate, review, object to and resolve all claims filed against the Debtor’s estate.⁴

B. The Bar Dates

7. On March 25, 2021, the Debtor filed its schedules of assets and liabilities.⁵

8. On March 19, 2021, the Court entered the *Order (A) Establishing Bar Dates for Filing Proofs of Claim, and (B) Approving the Form and Manner of Notice Thereof* (the “**Bar Date Order**”).⁶ The Bar Date Order established, among other deadlines, (i) April 30, 2021 at 5:00 p.m. (ET) as the deadline, for each person or entity other than governmental units, to file proofs of prepetition claims, including administrative expense claims arising pursuant to section 503(b)(9) of the Bankruptcy Code (the “**General Bar Date**”); and (ii) September 3, 2021 at 5:00 p.m. (ET) as the last date for governmental units to file proofs of claim that arose before the Petition Date (the “**Government Bar Date**” and, together with the General Bar Date, the “**Bar Dates**”).

9. The Debtor mailed the notice of the Bar Dates to all known creditors and interest holders.⁷

⁴ See also 11 U.S.C. § 502(b).

⁵ Docket Nos. 62 and 63.

⁶ Docket No. 52.

⁷ Docket No. 71.

C. The Claims Resolution Process

10. The Debtor's claims register, prepared by Kurtzman Carson Consultants LLC, reflects that as of the date of this Second Omnibus Objection, 23 proofs of claim have been filed against the Debtor's estate (the "**Filed Claims**"), in addition to 8 claims that are listed on the Debtor's schedules (the "**Scheduled Claims**" and, together with the Filed Claims, the "**Claims**").

11. The Trust's professionals have reviewed and analyzed Claims asserted in this Chapter 11 case. This process includes identifying categories of Claims that may be targeted for disallowance and expungement.

RELIEF REQUESTED

12. By this Second Omnibus Objection and for the reasons described more fully below, the Trust requests entry of the Proposed Order disallowing the Claims set forth on Exhibit A attached thereto, pursuant to section 502(b) of the Bankruptcy Code, Bankruptcy Rule 3007 and Local Bankruptcy Rule 3007-1.

OBJECTION

13. Section 502(a) of the Bankruptcy Code provides, in pertinent part, that "[a] claim or interest, proof of which is filed under section 501 of this title, is deemed allowed, unless a party in interest ... objects."⁸ Once an objection to a claim is filed, the Court, after notice and hearing, shall determine the allowed amount of the claim.⁹

14. Section 502(b)(1) of the Bankruptcy Code provides, in part, that a claim may not be allowed to the extent that it "is unenforceable against the debtor and property of the

⁸ 11 U.S.C. § 502(a).

⁹ See 11 U.S.C. § 502(b).

debtor, under any agreement or applicable law.”¹⁰ While a properly filed proof of claim is *prima facie* evidence of the claim’s allowed amount, when an objecting party presents evidence to rebut a claim’s *prima facie* validity, the claimant bears the burden of proving the claim’s validity by a preponderance of evidence.¹¹ The burden of persuasion with respect to the claim is always on the claimant.¹² The failure to allege facts and to provide sufficient support for a claim deprives the claim of *prima facie* validity.¹³

15. For the reasons set forth below, there is ample evidence to rebut the *prima facie* validity of each Claim.

16. As set forth in the Declaration, the Trust has identified certain claims listed on Exhibit A to the Proposed Order (the “**No Liability Claims**”) that, as evidenced by the documentation attached to the Claim, (i) are based on the respective claimant’s limited partnership interests in a non-Debtor entity or (ii) is a trade obligation of a non-Debtor entity. Because they are not enforceable against the Debtor under any applicable law or agreement within the meaning of section 502(b)(1) of the Bankruptcy Code, the Debtor’s estate is not liable for such Claims. Accordingly, the Trust (i) objects to the No Liability Claims, and (ii) requests entry of an order disallowing each of the No Liability Claims listed on Exhibit A to the Proposed Order.

RESPONSES TO OMNIBUS OBJECTIONS

17. To contest an objection, a claimant must file and serve a written response to this Second Omnibus Objection (a “**Response**”) so that it is received no later than **April 22,**

¹⁰ 11 U.S.C. § 502(b)(1).

¹¹ See *In re Allegheny Int’l, Inc.*, 954 F.2d 167, 173-74 (3d Cir. 1992).

¹² See *id.* at 174.

¹³ See, e.g., *In re Jorczak*, 314 B.R. 474, 481-82 (Bankr. D. Conn. 2004) (discussing the evidentiary requirements and burden of proof with respect to the allowance of claims).

2022 at 4:00 p.m. (Prevailing Eastern Time) (the “**Response Deadline**”). Every Response must be filed with the Office of the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Wilmington, Delaware 19801, and served the following entities, so that the Response is received no later than the Response Deadline, at the following addresses:

Potter Anderson & Corroon LLP
1313 N. Market Street, 6th Floor
Wilmington, Delaware 19801
Attn: Christopher Samis

- and -

Kelley Drye & Warren LLP
3 World Trade Center
175 Greenwich Street
New York, New York 10007
Attn: James Carr
Sean Wilson

18. Every Response to this Second Omnibus Objection must contain, at a minimum, the following information:

- i. a caption setting forth the name of the Court, the name of the Debtor, the case number, and the title of objection to which the Response is directed;
- ii. the name of the claimant, the Claim number, and a description of the basis for and amounts asserted in the Claim;
- iii. the specific factual basis and supporting legal argument upon which the party will rely in opposing this Second Omnibus Objection;
- iv. any supporting documentation, to the extent it was not included with the Claim previously filed with the clerk or claims agent, upon which the party will rely to support the basis for and amounts asserted in the Claim; and
- v. the name, address, telephone number, email address of the person(s) (which may be the claimant or the claimant’s legal representative) with whom counsel for the Trust should communicate with respect to the Claim or the Second Omnibus Objection and who possesses authority to reconcile, settle, or otherwise resolve the objection to the disputed Claim on behalf of the claimant.

19. If a claimant fails to file and serve a timely Response by the Response Deadline, the Trust will present to the Court an appropriate order disallowing such claimant's Claim, as set forth in Exhibit A to the Proposed Order, without further notice to the claimant.

REPLIES TO RESPONSES

20. Consistent with Local Rule 9006-1(d), the Trust may, at its option, file and serve a reply to a Response no later than 4:00 p.m. (Prevailing Eastern Time) one (1) day prior to the deadline for filing the agenda for any hearing to consider the Second Omnibus Objection.

SEPARATE CONTESTED MATTERS

21. To the extent a Response is filed regarding any claim listed in this Second Omnibus Objection and the Trust is unable to resolve the Response, the objection by the Trust to each such claim asserted herein shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. Any order entered by the Court regarding an objection asserted in the Second Omnibus Objection shall be deemed a separate order with respect to each claim.

NOTICE

22. Notice of this Motion shall be provided to: (i) the Office of the United States Trustee for the District of Delaware; (ii) each of the claimants whose claim is subject to this Second Omnibus Objection; and (iii) all entities requesting notice pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested, the Trust submits that no further notice is required.

COMPLIANCE WITH LOCAL RULE 3007-1

23. The undersigned representative of Potter Anderson & Corroon LLP certifies that he has reviewed the requirements of Local Rule 3007-1 and that the Second Omnibus Objection substantially complies with that Local Rule. To the extent that the Second

Omnibus Objection does not comply in all respects with the requirements of Local Rule 3007-1, Potter Anderson & Corroon LLP believes such deviations are not material and respectfully requests that any such requirement be waived.

WHEREFORE, the Trust respectfully requests the entry of the Proposed Order, substantially in the form attached hereto as **Exhibit 2**, granting the relief requested and granting such other and further relief as the Court deems just and proper.

Dated: April 8, 2022
Wilmington, Delaware

Respectfully submitted,

/s/ Andrew L. Brown

Christopher M. Samis (No. 4909)

Andrew L. Brown (No. 6766)

POTTER ANDERSON & CORROON LLP

1313 N. Market Street, 6th Floor

Wilmington, Delaware 19801

Telephone: (302) 984-6000

Facsimile: (302) 658-1192

Email: csamis@potteranderson.com

abrown@potteranderson.com

-and-

James S. Carr, Esq. (admitted *pro hac vice*)

Benjamin D. Feder, Esq. (admitted *pro hac vice*)

Sean T. Wilson, Esq. (admitted *pro hac vice*)

KELLEY DRYE & WARREN LLP

3 World Trade Center

175 Greenwich Street

New York, New York 10007

Telephone: (212) 808-7800

Facsimile: (212) 808-7897

Email: jcarr@kelleydrye.com

bfeder@kelleydrye.com

swilson@kelleydrye.com

Counsel for the Liquidating Trust

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Medley LLC,¹

Debtor.

Chapter 11

Case No. 21-10526 (KBO)

Hearing Date: May 19, 2022 at 9:00 a.m. (ET)

Objection Deadline: April 22, 2022 at 4:00 p.m. (ET)

**NOTICE OF SECOND OMNIBUS (SUBSTANTIVE) OBJECTION OF THE
MEDLEY LLC LIQUIDATING TRUST TO CERTAIN NO LIABILITY CLAIMS**

PLEASE TAKE NOTICE that Saccullo Business Consulting, LLC, solely in its capacity as trustee (the “**Trustee**”) of the Medley LLC Liquidating Trust (the “**Trust**”) established in the above-captioned chapter 11 case, by and through its undersigned counsel, filed the *Second Omnibus (Substantive) Objection of the Medley LLC Liquidating Trust to Certain No Liability Claims* (the “**Objection**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”). Your claim(s) may be modified and/or disallowed as a result of the Objection. Therefore, you should read the attached Objection carefully.

PLEASE TAKE FURTHER NOTICE THAT YOUR RIGHTS MAY BE AFFECTED BY THE OBJECTION AND BY ANY FURTHER CLAIM OBJECTION THAT MAY BE FILED BY THE TRUSTEE OR OTHERWISE. THE RELIEF SOUGHT HEREIN IS WITHOUT PREJUDICE TO THE TRUSTEE’S RIGHT TO PURSUE FURTHER OBJECTIONS AGAINST YOUR CLAIM(S) SUBJECT TO THE OBJECTION IN ACCORDANCE WITH APPLICABLE LAW AND APPLICABLE ORDERS OF THE BANKRUPTCY COURT.

¹ The Debtor’s current mailing address is c/o Medley LLC Liquidating Trust, c/o Saccullo Business Consulting, LLC, 27 Crimson King Drive, Bear, DE 19701.

PLEASE TAKE FURTHER NOTICE that, if the holder of a claim that is the subject of the Objection wishes to respond to the Objection, the holder must file a written response with the Bankruptcy Court and serve it on the undersigned counsel so as to be received on or before on or before **April 22, 2022 at 4:00 p.m. (ET)**.

PLEASE TAKE FURTHER NOTICE that, responses to the Objection must contain, at a minimum, the following: (a) a caption setting forth the name of the Bankruptcy Court, the above-referenced case number and the title of the Objection to which the response is directed; (b) the name of the claimant, his/her/its claim number, and a description of the basis for the amount of the claim; (c) the specific factual basis and supporting legal argument upon which the claimant will rely in opposing this Objection; (d) any supporting documentation, to the extent it was not included with the proof of claim previously filed with the clerk or claims agent, upon which the claimant will rely to support the basis for and amounts asserted in the proof of claim; and (e) the name, address, email address, telephone number, and fax number of the person(s) (which may be the claimant or the claimant's legal representative) with whom counsel for the Liquidating Trustee should communicate with respect to the claim or the Objection and who possesses authority to reconcile, settle, or otherwise resolve the Objection to the disputed claim on behalf of the claimant.

IF NO RESPONSES TO THE OBJECTION ARE TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED IN THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

PLEASE TAKE FURTHER NOTICE that, if no response to the Objection is timely filed and received in accordance with the above procedures, an Order may be entered sustaining the Objection without further notice or a hearing. If a response is properly filed, served and received

in accordance with the above procedures and such response is not resolved, a hearing to consider such response and the Objection will be held before The Honorable Karen B. Owens, United States Bankruptcy Court, 824 North Market Street, 6th Floor, Courtroom No. 3, Wilmington, Delaware 19801 on **May 19, 2022 at 9:00 a.m. (ET)**. Only a response made in writing and timely filed and received will be considered by the Bankruptcy Court at the Hearing.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY SUSTAIN THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: April 8, 2022
Wilmington, Delaware

Respectfully submitted,

/s/ Andrew L. Brown

Christopher M. Samis (No. 4909)

Andrew L. Brown (No. 6766)

POTTER ANDERSON & CORROON LLP

1313 N. Market Street, 6th Floor

Wilmington, Delaware 19801

Telephone: (302) 984-6000

Facsimile: (302) 658-1192

Email: csamis@potteranderson.com

abrown@potteranderson.com

-and-

James S. Carr, Esq. (admitted *pro hac vice*)

Benjamin D. Feder, Esq. (admitted *pro hac vice*)

Sean T. Wilson, Esq. (admitted *pro hac vice*)

KELLEY DRYE & WARREN LLP

3 World Trade Center

175 Greenwich Street

New York, New York 10007

Telephone: (212) 808-7800

Facsimile: (212) 808-7897

Email: jcarr@kelleydrye.com

bfeder@kelleydrye.com

swilson@kelleydrye.com

Counsel for the Liquidating Trust

EXHIBIT 1

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Medley LLC,¹

Debtor.

Chapter 11

Case No. 21-10526 (KBO)

Hearing Date: May 19, 2022 at 9:00 a.m. (ET)

Objection Deadline: April 22, 2022 at 4:00 p.m. (ET)

**DECLARATION OF WILLIAM YIP IN SUPPORT OF
SECOND OMNIBUS (SUBSTANTIVE) OBJECTION OF THE
MEDLEY LLC LIQUIDATING TRUST TO CERTAIN NO LIABILITY CLAIMS**

I, William Yip, hereby declare under penalty of perjury:

1. I am the Manager for the above referenced debtor (the “**Debtor**”). Currently, I am assisting the Medley LLC Liquidating Trust (the “**Trust**”) established pursuant to the *Modified Third Amended Combined Disclosure Statement and Chapter 11 Plan of Medley LLC* (the “**Plan**”). I am authorized to make this declaration for all permissible purposes under the Federal Rules of Bankruptcy Procedure, the Federal Rules of Civil Procedure, and the Federal Rules of Evidence in support of the *Second Omnibus (Substantive) Objection of the Medley LLC Liquidating Trust to Certain No Liability Claims* (the “**Second Omnibus Objection**”).²

2. Pursuant to the Plan, the Trust is authorized and empowered to, among other things, prosecute and resolve objections to claims filed in this case.

3. On behalf of the Trust, I reviewed the Second Omnibus Objection, and I am directly or through other personnel, agents and attorneys, familiar with the information contained therein, and in the exhibits attached thereto. To the best of my knowledge, information

¹ The Debtor’s current mailing address is Medley LLC Liquidating Trust, c/o Saccullo Business Consulting, LLC, 27 Crimson King Drive, Bear, DE 19701


² Unless otherwise defined herein, capitalized terms used herein shall have the meanings ascribed to them in the corresponding Second Omnibus Objection.

and belief, and based on the information provided by the Trust's professionals and records available to me, the information contained in the Second Omnibus Objection and the exhibits attached thereto is true and accurate.

4. To the best of my knowledge and belief, and based on the information provided by the Trust's professionals and the records available to me, the No Liability Claims listed on Exhibit A to the Proposed Order (i) were filed on account of a claimant's limited liability interest in a non-Debtor entity or (ii) as evidenced by the invoice attached to the proof of claim, is a trade obligation of a non-Debtor entity, and are not enforceable against the Debtor under any applicable law or agreement within the meaning of section 502(b)(1) of the Bankruptcy Code. Therefore, the Debtor's estate is not liable for such Claims, and each of the No Liability Claims should be disallowed.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best my knowledge, and belief, and based on the information provided by the Trust's professionals and records available to me.

Dated: April 8, 2022

DocuSigned by:

8A2DBF4D8FAF466...
William Yip
Manager
Medley LLC

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Medley LLC,¹

Debtor.

Chapter 11

Case No. 21-10526 (KBO)

Re: Docket No. ____

**ORDER SUSTAINING SECOND OMNIBUS (SUBSTANTIVE) OBJECTION OF THE
MEDLEY LLC LIQUIDATING TRUST TO CERTAIN NO LIABILITY CLAIMS**

Upon consideration of the *Second Omnibus (Substantive) Objection of the Medley LLC Liquidating Trust to Certain No Liability Claims* (the “**Second Omnibus Objection**”);² and the Court having considered the Declaration in support of the Second Omnibus Objection; and it appearing that notice of the Second Omnibus Objection was good and sufficient upon the particular circumstances and that no other or further notice need be given; and the Court having considered the Second Omnibus Objection, the claims listed on **Exhibit A** attached thereto, and any responses hereto; and upon the record herein; and after due deliberation thereon; and good and sufficient cause appearing therefor; it is hereby

FOUND AND DETERMINED THAT:

1. The Second Omnibus Objection is a core proceeding under 28 U.S.C. § 157(b)(2); and
2. Each holder of a claim (as to each, a “**Claim**”) listed on **Exhibit A** attached to the Second Omnibus Objection and attached hereto was properly and timely served

¹ The Debtor’s current mailing address is c/o Medley LLC Liquidating Trust, c/o Saccullo Business Consulting, LLC, 27 Crimson King Drive, Bear, DE 19701.

² Unless otherwise defined herein, capitalized terms used herein shall have the meanings ascribed to them in the Second Omnibus Objection.

with a copy of the Second Omnibus Objection, this Order, the accompanying exhibits, and the notice; and

3. Any entity known to have an interest in the Claims subject to the Second Omnibus Objection has been afforded reasonable opportunity to respond to, or be heard regarding, the relief requested in the Second Omnibus Objection; and

4. The relief requested in the Second Omnibus Objection is in the best interests of the Debtor's creditors, the estate, and other parties in interest; and it is therefore

ORDERED, that the Second Omnibus Objection is SUSTAINED; and is further

ORDERED, that each of the No Liability Claims listed on the attached **Exhibit A** is hereby disallowed and expunged in its entirety; and it is further

ORDERED, that nothing in the Second Omnibus Objection or this Order shall be construed as an allowance of any Claim, and all of the Trust's rights and the rights of other parties in interest to object to any of the Claims or any other Claims (filed or not) which may be asserted against the Debtor on any other grounds are preserved. Additionally, should the grounds of objection stated in the Second Omnibus Objection be dismissed, the Trust's rights to object on other stated grounds or on any other grounds that the Trust discovers during the pendency of this case are further preserved; and it is further

ORDERED, that each Claim and the objections by the Trust to such Claim, as set forth on **Exhibit A** hereto, constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014 and Local Rule 3007-1. This Order shall be deemed a separate Order with respect to each Claim. Any stay of this Order pending appeal by any claimants whose Claims are subject to this Order shall only apply to the contested matter which involves such

claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Second Omnibus Objection or this Order; and it is further

ORDERED, that this Court shall retain jurisdiction over any matters related to or arising from the Second Omnibus Objection or the implementation of this Order.

EXHIBIT A

Exhibit A - No Liability Claims

See paragraph 16 of the Objection

Row #	Claims to Be Disallowed and Expunged				<u>Reason for Disallowance</u>
	<u>Claimant Name</u>	<u>Claim No.</u>	<u>Claim Amount</u>	<u>Claim Priority</u>	
1	Fire and Police Pension Fund, San Antonio	8	\$10,337,850.12	General Unsecured	Claim relates to limited partnership interests in Medley Opportunity Fund II LP and Medley Opportunity Fund III LP, which are non-Debtor entities.
2	New Mexico Educational Retirement Board	14	\$1,770,806.00	General Unsecured	Claim relates to limited partnership interest in Medley Opportunity Fund II LP, a non-Debtor entity.
3	RDG Filings (a division of Research Data Group, Inc.)	7	\$1,100.00	General Unsecured	The Claim is for an invoice that was issued to Medley Management, Inc., a non-Debtor entity.