

John R. Jones  
Texas Bar No. 10919500  
**J.R. JONES LAW, PLLC**  
6026 Remson Hollow Ln.  
Katy, TX 77494  
(281) 665-3851 Phone  
(832) 550-2528 Fax  
[John@jrjoneslaw.com](mailto:John@jrjoneslaw.com)  
Attorneys for Creditor Central  
Bank of St. Louis

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

|                                   |   |  |
|-----------------------------------|---|--|
| <b>IN RE:</b>                     | § |  |
|                                   | § | <b>In Proceedings Under Chapter 11</b> |
| <b>NEIGHBORS LEGACY HOLDINGS,</b> | § | <b>Case No.18-33836 (MI)</b>           |
| <b>INC., <i>et al.</i>,</b>       | § |  |
|                                   | § | <b>(Jointly Administered)</b>          |
| <b>Debtors.</b>                   | § |  |

**CREDITOR CENTRAL BANK OF ST. LOUIS LIMITED OBJECTION TO  
PROPOSED CURE AMOUNTS (DOCKET NO. 236 AND 255)**

COMES NOW Central Bank of St. Louis (“Creditor”), by and through its undersigned counsel, and states and alleges as follows:

1. On August 15, 2018 and August 17, 2018, Debtors filed their Notice [Doc. # 236] and Amended Notice [Doc. # 255] of Executory Contracts and Unexpired Leases Subject to Possible Assumption and Assignment and Proposed Cure Amounts. Contained therein are amounts the debtor believes are enough to cure any defaults under the potentially assumed executory contracts.

2. Central Bank has a number of executory contracts and unexpired leases that may be included as part of the sale(s) of the Debtors’ assets and believes that the cure amounts set out by Debtors significantly understate the cure amounts necessary. Central Bank has requested from Debtors’ counsel and received permission for a business representative (i.e. nonlawyer) of Central



Bank to confer with the appropriate business person with Debtors to discuss and work through this issue to arrive at a mutually agreeable number for the cure amounts due under Section 365 of the Bankruptcy Code.

3. Central Bank does not object to the assumption and assignment of the lease agreements provided that all defaults under the leases are fully cured as required by Section 365 of the Bankruptcy Code and any successful bidder provides adequate assurance of future performance.

4. Central Bank reserves the right to modify, supplement or amend this objection, as well as to object to the assignment and ultimately sale of assets.

WHEREFORE Creditor Central Bank of St. Louis respectfully prays that this Court approve the Debtors' request to assume and assign only with the correct cure amounts and for such other and further relief as is just and proper under the law and circumstances.

Dated: August 21, 2018

Respectfully submitted,

**J.R. JONES LAW, PLLC**  
6026 Remson Hollow Ln.  
Katy, TX 77494  
(281) 665-3851 Phone  
(832) 550-2528 Fax  
[John@jrlaw.com](mailto:John@jrlaw.com)

By:/s/ John R. Jones

John R. Jones  
Texas Bar No. 10919500  
*Attorney for Creditor Central Bank of St. Louis*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 21, 2018, the foregoing document will be served via first class U.S. Mail to the parties listed below, or alternatively, notice of this document was electronically mailed on July 24, 2018 to the parties registered or otherwise entitled to receive electronic notices in these cases pursuant to the Electronic Filing Procedures in this District.

/s/ John R. Jones

John R. Jones