

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

In re:) Chapter 11
)
SCHOOL SPECIALTY, INC., et al.,) Case No. 13-10125 (KJC)
) (Jointly Administered)
Debtors.)
) Related Docket No. 902

**OBJECTION OF TEKSYSTEMS GLOBAL SERVICES, LLC
TO DEBTORS' PROPOSED CURE AMOUNT**

TEKsystems Global Services, LLC ("TEKsystems Global") for its Objection to Debtors' proposed cure amount, respectfully states as follows:

1. On April 24, 2013, Debtors filed their Notice of (I) Possible Assumption of Executory Contracts and Unexpired Leases (II) Fixing of Cure Amounts and (III) Deadline to Object to Cure Amounts and Adequate Assurance of Future Performance ("Notice") [Docket No. 902], with an Exhibit A attached thereto listing executory contracts and unexpired leases that Debtors may assume and setting forth the Debtors' proposed cure amounts.

2. Exhibit A lists a service contract ("Contract") showing TEKsystems Global as the contract counterparty and a proposed cure amount of \$7,600.00.

3. TEKsystems Global objects to the proposed cure amount. As reflected in TEKsystems Global's proof of claim, a copy of which is attached hereto as **Exhibit A**, TEKsystems Global holds a prepetition claim for services provided pursuant to the Contract of \$76,000.00.

4. Accordingly, the appropriate cure amount to be paid to TEKsystems Global pursuant to Code § 365(b) for the Debtors' assumption of the Contract is \$76,000.00.

WHEREFORE, TEKsystems Global requests that its cure amount be amended to reflect a total of \$76,000.00 and for such other and further relief as the Court deems just and proper.



Dated: May 16, 2013
Wilmington, DE

McCARTER & ENGLISH, LLP

By: s/William F. Taylor, Jr.

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*Attorneys for Defendant, TEKsystems
Global Services LLC*

EXHIBIT A

B 10 Modified (Official Form 10) (12/11)

UNITED STATES BANKRUPTCY COURT DISTRICT OF DELAWARE		PROOF OF CLAIM
<p style="text-align: center;">Indicate Debtor against which you assert a claim by checking the appropriate box below. (Check only one Debtor per claim form.)</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 30%;"> <input checked="" type="checkbox"/> School Specialty, Inc. (Case No. 13-10125) <input type="checkbox"/> Delta Education, LLC (Case No. 13-10124) <input type="checkbox"/> Bird-in-Hand Woodworks, Inc. (Case No. 13-10126) <input type="checkbox"/> Califone International, Inc. (Case No. 13-10127) </div> <div style="width: 30%;"> <input type="checkbox"/> Childcraft Education Corp, Inc. (Case No. 13-10128) <input type="checkbox"/> Classroomdirect.com, LLC (Case No. 13-10129) <input type="checkbox"/> Frey Scientific, Inc. (Case No. 13-10130) <input type="checkbox"/> Premier Agendas, Inc. (Case No. 13-10131) </div> <div style="width: 30%;"> <input type="checkbox"/> Sax Arts & Crafts, Inc. (Case No. 13-10132) <input type="checkbox"/> Sportime, LLC (Case No. 13-10133) </div> </div>		
<p>NOTE: This form should not be used to make a claim for an administrative expense (other than a claim asserted under 11 U.S.C. § 503(b)(9)) arising after the commencement of the case. A "request" for payment of an administrative expense (other than a claim asserted under 11 U.S.C. § 503(b)(9)) may be filed pursuant to 11 U.S.C. § 503.</p>		
Name of Creditor (the person or other entity to whom the debtor owes money or property): TEKsystems, Inc.		<input type="checkbox"/> Check this box if this claim amends a previously filed claim. Court Claim Number: _____ <i>(If known)</i> Filed on: _____
Name and address where notices should be sent: TEKsystems, Inc. 7437 Race Rd. Hanover, MD 21076 Attn: Kyle Connor Telephone number: 410-540-7961 email: kconnor@teksystems.com		
Name and address where payment should be sent (if different from above): Telephone number: _____ email: _____		<input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of claim relating to this claim. Attach copy of statement giving particulars. 5. Amount of Claim Entitled to Priority under 11 U.S.C. §507(a). If any part of the claim falls into one of the following categories, check the box specifying the priority and state the amount. <input type="checkbox"/> Domestic support obligations under 11 U.S.C. §507(a)(1)(A) or (a)(1)(B). <input type="checkbox"/> Wages, salaries, or commissions (up to \$11,725*) earned within 180 days before the case was filed or the debtor's business ceased, whichever is earlier – 11 U.S.C. §507 (a)(4). <input type="checkbox"/> Contributions to an employee benefit plan – 11 U.S.C. §507 (a)(5). <input type="checkbox"/> Up to \$2,600* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use – 11 U.S.C. §507 (a)(7). <input type="checkbox"/> Taxes or penalties owed to governmental units – 11 U.S.C. §507 (a)(8). <input type="checkbox"/> Other – Specify applicable paragraph of 11 U.S.C. §507 (a)(____). Amount entitled to priority: \$ _____
1. Amount of Claim as of Date Case Filed: \$ 76,000.00 If all or part of the claim is secured, complete item 4. If all or part of the claim is entitled to priority, complete item 5. <input type="checkbox"/> Check this box if the claim includes interest or other charges in addition to the principal amount of the claim. Attach a statement that itemizes interest or charges.		
2. Basis for Claim: services rendered (See instruction #2)		* Amounts are subject to adjustment on 4/1/13 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment
3. Last four digits of any number by which creditor identifies debtor: <u>8 7 5 1</u>	3a. Debtor may have scheduled account as: (See instruction #3a)	
4. Secured Claim (See instruction #4) Check the appropriate box if the claim is secured by a lien on property or a right of setoff, attach required redacted documents, and provide the requested information. Nature of property or right of setoff: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other Describe: Value of Property: \$ _____ Annual Interest Rate _____ % <input type="checkbox"/> Fixed <input type="checkbox"/> Variable (when case was filed) Amount of arrearage and other charges, as of the time case was filed, included in secured claim, if any: \$ _____ Basis for perfection: _____ Amount of Secured Claim: \$ _____ Amount Unsecured: \$ _____		3b. Uniform Claim Identifier (optional): (See instruction #3b)
6. Claim Pursuant to 11 U.S.C. § 503(b)(9): 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. \$ _____ (See instruction #6)		
7. Credits. The amount of all payments on this claim has been credited for the purpose of making this proof of claim. (See instruction #7)		
8. Documents: Attached are redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. If the claim is secured, box 4 has been completed, and redacted copies of documents providing evidence of perfection of a security interest are attached. (See instruction 8, and the definition of "redacted") DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING. If the documents are not available, please explain:		
9. Signature: (See instruction #9) Check the appropriate box. <div style="display: flex; justify-content: space-between;"> <div style="width: 30%;"> <input checked="" type="checkbox"/> I am the creditor. </div> <div style="width: 30%;"> <input type="checkbox"/> I am the creditor's authorized agent. (Attach copy of power of attorney, if any.) </div> <div style="width: 30%;"> <input type="checkbox"/> I am the trustee, or the debtor, or their authorized agent. (See Bankruptcy Rule 3004.) </div> <div style="width: 30%;"> <input type="checkbox"/> I am a guarantor, surety, indorser, or other codebtor. (See Bankruptcy Rule 3005.) </div> </div> <p>I declare under penalty of perjury that the information provided in this claim is true and correct to the best of my knowledge, information, and reasonable belief.</p> <p>Print Name: <u>Kyle Connor</u> Title: <u>Corporate Credit Manager</u> Company: <u>TEKsystems, Inc.</u> Address and telephone number (if different from notice address above): _____ Telephone number: _____ Email: _____</p>		

Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571.

EXHIBIT A



Invoice No: TGS0038751
 Invoice Date: 12/12/12
 PO Number: NA

Payment Terms: Net 30 Days
 Payment Due: 1/11/2013

AMOUNT DUE: \$38,000.00

School Specialty
 ATTN: Ray Buitenbos
 2000 Kentucky Street
 Bellingham, WA 98229

Please Remit To:
 TEKsystems, Inc.
 PO Box 198568
 Atlanta, GA 30384-8568

For billing inquiries call Rick Anger 410-540-7826 or ranger@teksystems.com

Description	Date Range	Qty	Rate	Amount
Steady State Services (Help Desk)	Nov-12	1.00	\$38,000.00	\$38,000.00

TOTAL AMOUNT DUE: \$38,000.00

Payment Due: 1/11/2013



Invoice No: TGSM10243
 Invoice Date: 02/14/13
 PO Number: NA

Payment Terms: Net 30 Days
 Payment Due: 3/16/2013

AMOUNT DUE: \$38,000.00

School Specialty
 ATTN: Ray Buitenbos
 2000 Kentucky Street
 Bellingham, WA 98229

Please Remit To:
 TEKsystems, Inc.
 PO Box 198568
 Atlanta, GA 30384-8568

For billing inquiries call Rick Anger 410-540-7826 or ranger@teksystems.com

Description	Date Range	Qty	Rate	Amount
Steady State Services (Help Desk)	Jan-13	1.00	\$38,000.00	\$38,000.00

TOTAL AMOUNT DUE: \$38,000.00

Payment Due: 3/16/2013

CERTIFICATE OF SERVICE

I, William F. Taylor, Jr., hereby certify that on May 16, 2013, I caused a true and correct copy of the foregoing *Objection of TekSystems Global Services, LLC to Debtors' Proposed Cure Amount* to be served upon the below listed by electronic mail and U.S. Mail postage pre-paid.

/s/ William F. Taylor

William F. Taylor, Jr. (DE #2936)

School Specialty, Inc.
Attention: Michael P. Lavelle, CEO
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