

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	Chapter 11
WINDSTREAM FINANCE, CORP., et al., ¹)	Case No. 19-22397 (RDD)
Reorganized Debtors.)	(Jointly Administered)

SUPPLEMENTAL CERTIFICATE OF SERVICE

I, Heather Fellows, depose and say that I am employed by Kurtzman Carson Consultants LLC (KCC), the claims and noticing agent for the Debtors in the above-captioned case.

On March 8, 2021, at my direction and under my supervision, employees of KCC caused to be served per postal forwarding address the following documents via First Class Mail upon the service list attached hereto as **Exhibit B**:

- ***[Customized]* Notice of Reorganized Debtors' Objection to your No Liability Claim(s) and Deadline to File a Response with the Court** [attached hereto as **Exhibit A**]
- **Objection Procedures** [Exhibit 1 to Docket No. 1141]
- **Reorganized Debtors' Fourteenth Omnibus Objection to Cross-Debtor Claims, Insufficient Documentation Claims, Late-Filed Claims, No Liability Claims, Substantively Duplicate Claims, and Claims to be Modified** [Docket No. 43]

Dated: March 12, 2021

/s/ Heather Fellows
Heather Fellows
KCC
222 N Pacific Coast Highway, 3rd Floor
El Segundo, CA 90245
Tel 310.823.9000

¹ The last four digits of the Reorganized Debtor Windstream Finance, Corp.'s tax identification number are 5713. Due to the large number of Reorganized Debtors in these chapter 11 cases, for which joint administration has been granted, a complete list of the reorganized debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Reorganized Debtors' claims and noticing agent at <http://www.kccllc.net/windstream>. The location of the Reorganized Debtors' service address for purposes of these chapter 11 cases is 4001 North Rodney Parham Road, Little Rock, Arkansas 72212.



EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	
)	Chapter 11
)	
WINDSTREAM FINANCE, CORP., <i>et al.</i> , ¹)	Case No. 19-22397 (RDD)
)	
Reorganized Debtors.)	(Formerly Jointly Administered
)	under Lead Case: Windstream
)	Holdings, Inc., Case No. 19-22312)

**NOTICE OF REORGANIZED DEBTORS' OBJECTION TO YOUR NO LIABILITY
CLAIM(S) AND DEADLINE TO FILE A RESPONSE WITH THE COURT**

PLEASE TAKE NOTICE that Windstream Finance, Corp. and its affiliates (before the effective date of their chapter 11 plan,² collectively, the “Debtors” and after the effective date of their chapter 11 plan, collectively, the “Reorganized Debtors”) are objecting to your claim(s) pursuant to the attached objection (the “Objection”).³

PLEASE TAKE NOTICE THAT YOUR CLAIM(S) ON THE SCHEDULE ATTACHED TO THIS NOTICE MAY BE DISALLOWED, EXPUNGED, OR OTHERWISE AFFECTED AS A RESULT OF THE OBJECTION. THEREFORE, PLEASE READ THIS NOTICE AND THE ACCOMPANYING OBJECTION VERY CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.

Important Information Regarding the Objection

Grounds for the Objection. Pursuant to the Objection, the Reorganized Debtors are seeking to disallow and expunge your claim(s) listed in the table attached hereto as **Schedule 1** (such claim(s), the “Claim”) to this notice on grounds that the Debtors are not liable for such Claim because it is unenforceable against the Debtors. In addition, the complete list of No

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² The Debtors emerged from chapter 11 on September 21, 2020, as set forth in the *Notice of (I) Entry of Confirmation Order, (II) Occurrence of Effective Date, and (III) Related Bar Dates* [Docket No. 2527].

³ All capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in either the Objection Procedures (as defined herein) or Objection, each as applicable.

Liability Claims subject to the Objection may also be found on Schedule 4 attached to the Order, which is included in **Exhibit B** to this notice.

Objection Procedures. On October 10, 2019, the United States Bankruptcy Court for the Southern District of New York (the “Court”) entered an order [Docket No. 1141] approving procedures for filing and resolving objections to claims asserted against the Debtors in the chapter 11 cases, attached hereto as **Exhibit A** (the “Objection Procedures”). ***Please review the Objection Procedures to ensure your response to the Objection, if any, is filed and served timely and correctly.***

Resolving the Objection

Resolving Objections. Certain of the Reorganized Debtors’ advisors will be available to discuss and resolve consensually the Objection to your Claim without the need for filing a formal response or attending a hearing. However, under the Objection Procedures, you must timely file and serve a Response under the Objection Procedures on or before the Response Deadline (as defined herein) unless you receive a written extension of the time to file a Response from the Reorganized Debtors, or the Objection may be granted. Please contact Trudy Smith and Chris Ceresa at Kirkland & Ellis LLP, the Reorganized Debtors’ restructuring counsel, via (a) e-mail at trudy.smith@kirkland.com and chris.ceresa@kirkland.com, respectively, or (b) telephone at (646) 617-4745 and (212) 390-4056, respectively, within twenty-one (21) calendar days after the date of this notice or such other date as the Reorganized Debtors may agree in writing. Please have your proof(s) of claim and any related material available for any such discussions.

Parties Required to File a Response. If you are not able to resolve consensually the Objection filed with respect to your claim as set forth above, you must file a response (each, a “Response”) with the Court in accordance with the procedures described below.

Response Contents. Each Response must contain the following (at a minimum):

- a. a caption with the name of the Court, the name of the Reorganized Debtors, the case number, the title of the Objection to which the Response is directed, and, if applicable, the proof of Claim number(s) related thereto from the Claims Register;
- b. a concise statement setting forth the reasons why the Court should not grant the Objection with respect to your Claim, including the specific factual and legal bases upon which the claimant will rely in opposing the Objection;
- c. a copy of any other documentation or other evidence of the Claim, to the extent not already included with the proof of Claim, upon which the claimant will rely in opposing the Objection; *provided* that the claimant need not disclose confidential, proprietary, or otherwise protected information in the Response; *provided, however*, that the claimant shall disclose to the Reorganized Debtors all information and provide copies of all documents that the claimant believes to be confidential, proprietary, or

otherwise protected and upon which the claimant intends to rely in support of its claim, subject to appropriate confidentiality constraints; and

- d. the following contact information for the responding party:
- (i) the name, address, telephone number, and email address of the responding claimant or the claimant's attorney or designated representative to whom the attorneys for the Reorganized Debtors should serve a reply to the Response, if any; or
 - (ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the Objection on the claimant's behalf.

Notice and Service. Your Response must be filed with the Court and served so as to be *actually received* on or before **4:00 p.m. (prevailing Eastern Time) on March 10, 2021**, unless the Reorganized Debtors consent to an extension in writing (the "**Response Deadline**"). The Response must be filed with the Court and served timely, with a copy to the Court's chambers, on the Reorganized Debtors, Kirkland & Ellis LLP, 601 Lexington Avenue, New York, New York 10022, Attn: Stephen E. Hessler, P.C., Trudy Smith, and Chris Ceresa; and Kirkland & Ellis LLP, 300 North LaSalle Street, Chicago, Illinois 60654, Attn: Ross M. Kwasteniet, P.C., Brad Weiland, and John R. Luze.

Failure to Respond. A Response that is not filed and served in accordance with the procedures set forth herein may not be considered at the Hearing before the Court. **Failure to both file and serve a Response timely as set forth herein may result in the Court granting the Objection without further notice or hearing.** Affected creditors will be served with a copy of the order once it has been entered.

Hearing on the Objection

Date, Time, and Location. A hearing (the "**Hearing**") on the Objection will be held on **Wednesday, March 17, 2021, at 10:00 a.m., prevailing Eastern Time**, before the Honorable Robert D. Drain, United States Bankruptcy Judge for the Southern District of New York, in Courtroom 623 of the United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains, New York 10601. The hearing may be adjourned to a subsequent date as provided in the case management order (the "**Case Management Order**") [Docket No. 392]. **You must attend the Hearing if you disagree with the Objection and have filed a Response that remains unresolved prior to the Hearing. You may seek to attend telephonically as provided in the Case Management Order.** If such matters cannot be resolved and a hearing is determined to be necessary, the Reorganized Debtors shall file with the Court and serve on the affected claimants a notice of the hearing to the extent the Reorganized Debtors did not file a notice of hearing previously.

Discovery. If either party to the Objection determines that discovery is necessary in advance of a hearing on an Objection, it will serve notice on the affected claimant and its counsel of record that the scheduled hearing will be treated as a status conference during which the parties will request that the Court issue a scheduling order to facilitate dismissal or resolution of

the litigation. Such notice may be incorporated into the initial agenda letter for the hearing or may be provided in a separate notice. In accordance with Local Rule 9014-2, the first hearing on any contested Objection with respect a particular claim will not be an evidentiary hearing, and there is no need for any witnesses to appear at such hearing unless the Court orders otherwise.

Additional Information

Additional Information. Copies of these procedures, the Objection, or any other pleadings filed in these chapter 11 cases are available for free online at <http://www.kccllc.net/windstream>. Copies of these documents may also be obtained upon written request to the Reorganized Debtors' Claims and Noticing Agent at the following address: Windstream Finance, Corp., et al., c/o Kurtzman Carson Consultants LLC, 222 N. Pacific Coast Highway, Suite 300, El Segundo, CA 90245. You may also obtain copies of any of the documents filed in the Reorganized Debtors' chapter 11 cases for a fee via PACER at <http://www.nysb.uscourts.gov>. **Please do not contact the Court to discuss the merits of any claim or any Objection filed with respect thereto.**

Reservation of Rights

NOTHING IN ANY NOTICE SHALL BE DEEMED TO CONSTITUTE A WAIVER OF ANY RIGHTS OF THE REORGANIZED DEBTORS, THE DEBTORS, OR ANY OTHER PARTY IN INTEREST TO DISPUTE ANY CLAIMS, TO ASSERT COUNTERCLAIMS, RIGHTS OF OFFSET OR RECOUPMENT, OR DEFENSES, TO OBJECT TO ANY CLAIMS ON ANY GROUNDS NOT PREVIOUSLY RAISED IN AN OBJECTION (UNLESS THE COURT HAS ALLOWED THE CLAIM OR ORDERED OTHERWISE), OR TO SEEK TO ESTIMATE ANY CLAIM AT A LATER DATE. AFFECTED PARTIES WILL BE PROVIDED APPROPRIATE NOTICE THEREOF AT SUCH TIME.

[Remainder of page intentionally left blank]

Dated: February 12, 2021
New York, New York

/s/ Stephen E. Hessler, P.C.

Stephen E. Hessler, P.C.

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP

601 Lexington Avenue

New York, New York 10022

Telephone: (212) 446-4800

Facsimile: (212) 446-4900

- and -

James H.M. Sprayregen, P.C.

Ross M. Kwasteniet, P.C. (admitted *pro hac vice*)

Brad Weiland (admitted *pro hac vice*)

John R. Luze (admitted *pro hac vice*)

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP

300 North LaSalle Street

Chicago, Illinois 60654

Telephone: (312) 862-2000

Facsimile: (312) 862-2200

Counsel to the Reorganized Debtors

Schedule 1 to the Notice

Claimant Name:

CLAIM(S) TO BE DISALLOWED

ROW #	DATE FILED	DEBTOR / CASE NUMBER	CLAIM #	ASSERTED CLAIM AMOUNT	REASON FOR OBJECTION
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[Customized Claim information included herein]

EXHIBIT B

Exhibit B
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Affected Parties (No Liability Claims)

Served via First Class Mail

CreditorName	Address	City	State	Zip
Harris, Justin M	142 Taylor Dr	Oden	AR	71961-8210