

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

In re:  CD LIQUIDATION CO. PLUS, LLC, f/k/a CYNERGY DATA, LLC, <i>et al.</i> , <sup>1</sup>  Debtors.	Chapter 11  Case No. 09-13038 (KG)  (Jointly Administered)
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**NOTICE OF AMENDED AGENDA OF MATTERS SCHEDULED  
FOR HEARING ON NOVEMBER 12, 2010 AT 11:00 A.M. EASTERN TIME**

**UNCONTESTED MATTERS WITH A FILED CNO:**

1. Fifth Motion of the Debtors and Debtors-in-Possession for Entry of an Order Pursuant to Section 1121(d) of the Bankruptcy Code Extending Debtors' Exclusive Periods Within Which to File and Solicit Acceptances of a Plan (Docket No. 982; filed October 5, 2010)

Objection Deadline: October 26, 2010 at 4:00 p.m.

Objections Received: None.

Related Documents: Certificate of No Objection Regarding Fifth Motion of the Debtors and Debtors-in-Possession for Entry of an Order Pursuant to Section 1121(d) of the Bankruptcy Code Extending Debtors' Exclusive Periods Within Which to File and Solicit Acceptances of a Plan (Docket No. 1095; filed November 5, 2010)

Status: No hearing necessary. Counsel requests the proposed order submitted with the Certificate of No Objection be entered at the Court's convenience.

2. First Notice of Satisfaction of Claims (Docket No. 991; filed October 8, 2010)

Objection Deadline: November 5, 2010 at 4:00 p.m.

Objections Received: None.

Related Documents: **Certificate of No Objection Regarding First Notice of Satisfaction of Claims (Docket No. 1110; filed November 9, 2010)**

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<sup>1</sup> The Debtors are the following entities (with the last four digits of their federal tax identification numbers in parentheses): Cynergy Data, LLC (8677); Cynergy Data Holdings, Inc. (8208); Cynergy Prosperity Plus, LLC (4265). The mailing address for the Debtors is 30-30 47th Avenue, 9th Floor, Long Island City, New York 11101.



Status: **This matter has been resolved. A Certificate of No Objection has been filed and the claims register has been updated to mark the claims satisfied. No further action is required by the Court with respect to this matter.**

### **STATUS CONFERENCE**

3. Motion for Entry of an Order, Pursuant to Sections 105(a) and 365 of the Bankruptcy Code, Approving Stipulation in Partial Satisfaction of the Objections by Pivotal Payments Inc. to the Debtors' Cure Notice (Docket No. 980; filed October 4, 2010)

Objection Deadline: October 14, 2010 at 4:00 p.m. (extended to October 18, 2010 for Michael Mora, counsel to the Federal Trade Commission)

Objections Received:

- a. Natrascience, LLC's Objection to Motion for Entry of an Order Pursuant to Sections 105(a) and 365 of the Bankruptcy Code, Approving Stipulation in Partial Satisfaction of the Objections by Pivotal Payments Inc. to the Debtors' Cure Notice (Docket No. 1004; filed October 14, 2010)
- b. Limited Objection of Federal Trade Commission to Debtors' Motion for Entry of Order, Pursuant to Sections 105(a) and 365 of Bankruptcy Code, Approving Stipulation in Partial Satisfaction of Objections by Pivotal Payments, Inc. to Debtors' Cure Notice (Docket No. 1022; filed October 18, 2010)
- c. Notice of Partial Withdrawal of Objection of Pivotal Payments, Inc. to the Notice of Debtors' Intent to Assume and Assign Certain Unexpired Leases and Executory Contracts and Setting Forth the Cure Amounts (Docket No. 1036; filed October 19, 2010)
- d. Objection of Diamond J. Media, Inc. to Motion for Entry of Order, Pursuant to Sections 105(a) and 365 of the Bankruptcy Code, Approving Stipulation in Partial Satisfaction of the Objections by Pivotal Payments Inc. to the Debtors' Cure Notice (Docket No. 1042; filed October 20, 2010)

Related Documents:

- a. Response of Pivotal Payments Inc. to the Objection of Natrascience, LLC to Motion for Entry of an Order Pursuant to Sections 105(a) and 365 of the Bankruptcy Code Approving Stipulation and Partial Satisfaction of the Objections by Pivotal Payments, Inc. to the Debtor 's Cure Notice (Docket No. 1020; filed October 18, 2010)
- b. Declaration of Marianne Tawa in Support of the Response of Pivotal Payments Inc. to the Objection of Natrascience, LLC to Motion for Entry

of an Order Pursuant to Sections 105(a) and 365 of the Bankruptcy Code Approving Stipulation and Partial Satisfaction of the Objections by Pivotal Payments, Inc. to the Debtor's Cure Notice (Docket No. 1021; filed October 18, 2010)

- c. Certification of Counsel Regarding Order Approving, Pursuant to Sections 105(a) and 365 of the Bankruptcy Code, Approving Stipulation in Partial Satisfaction of the Objections by Pivotal Payments Inc. to the Debtors' Cure Notice (Docket No. 1051; filed October 22, 2010)
- d. Signed Order Approving, Pursuant to Sections 105(a) and 365 of the Bankruptcy Code, Approving Stipulation in Partial Satisfaction of the Objections by Pivotal Payments Inc. to the Debtors' Cure Notice (Docket No. 1053; entered October 22, 2010)

Status: This matter is going forward as a status conference only.

**CONTESTED MATTER:**

- 4. Fourth Omnibus (Substantive) Objection of the Debtors to Claims Pursuant to 11 U.S.C. § 502(b), Fed. R. Bankr. P. 3003 and 3007 and Local Rule 3007-1 (Docket No. 988; filed October 8, 2010)

Objection Deadline: November 5, 2010 at 4:00 p.m. (extended to November 9, 2010 for (i) WorldVentures Marketing, LLC, (ii) Total Mobile Control LLC, (iii) Natural Body Scapes LLC, and (iv) Eden Cosmetics LLC)

**Informal Responses Received:**

- a. **Informal response by total Mobile Control LLC.**
- b. **Informal response by Natural Body Scapes LLC.**
- c. **Informal response by Eden Cosmetics LLC.**

Objections Received: **Response of Worldventures Marketing, Inc. to Debtor's Fourth Omnibus (Substantive) Objection to Claims (Docket No. 1109; filed November 9, 2010)**

Related Document: Notice of Submission of Copies of Proofs of Claim for Fourth and five Omnibus (Substantive) Objection of the Debtors to Claims Pursuant to 11 U.S.C. § 502(B), Fed. R. Bankr. P. 3003 and 3007 and Local Rule 3007-1 (Docket No. 1055; filed October 28, 2010)

Status: This matter is going forward.

## **CONTESTED MATTERS:**

5. First Omnibus (Substantive) Objection of the Debtors to Claims Pursuant to 11 U.S.C. § 502(b), Fed. R. Bankr. P. 3003 and 3007 and Local Rule 3007-1 (Docket No. 956; filed September 21, 2010)

Objection Deadline: October 14, 2010 at 4:00 p.m.

Informal Responses Received:

- a. Royal Palms Travel d/b/a All Inclusive Excursions
- b. EPay Data, Inc.
- c. Phoenix, LP d/b/a Travel Services, Grand Vacation Club, Grand Vacation Club II and Bon Voyage Travel

Objections Received:

- d. Response of Diamond J. Media, Inc. and Network Agenda LLC to First Omnibus (Substantive) Objection of the Debtors to Claims Pursuant to 11 U.S.C. § 502(B), Fed. R. Bankr. P. 3003 and 3007 and Local Rule 3007-1 (Claim Nos.: 54, 58, and 68) (Docket No. 1005; filed October 14, 2010)
- e. Response of Eden Concepts, LLC d/b/a Mineral Elements to Debtors' First Omnibus (Substantive) Objection of the Debtors to Claims Pursuant to 11 U.S.C. § 502(B), Fed. R. Bankr. P. 3003 and 3007 and Local Rule 3007-1 (Docket No. 1009; filed October 14, 2010)
- f. Response of Buyers Advantage Solutions, Inc. d/b/a Idsecure Solutions to Debtors' First Omnibus (Substantive) Objection of the Debtors to Claims Pursuant to 11 U.S.C. § 502(B), Fed. R. Bankr. P. 3003 and 3007 and Local Rule 3007-1 (Docket No. 1010; filed October 14, 2010)
- g. Response of Natural Body Scapes, LLC d/b/a BERRYMD to Debtors' First Omnibus (Substantive) Objection of the Debtors to Claims Pursuant to 11 U.S.C. § 502(B), Fed. R. Bankr. P. 3003 and 3007 and Local Rule 3007-1 (Docket No. 1011; filed October 14, 2010)

Related Documents:

- a. Notice of Submission (Docket No. 975; filed September 30, 2010)
- b. Response of Pivotal Payments, Inc. to (a) Response of Diamond J. Media Inc. and Network Agenda LLC to First Omnibus (Substantive) Objection of the Debtors to Claims Pursuant to 11 U.S.C. § 502(b), Fed. R. Bankr. P. 3003 and 3007, and Local Rule 3007-1; and (B) Response of Diamond J. Media Inc. and JRB Media, Inc. to Second Omnibus (Substantive) Objection of the Debtors to Claims Pursuant to 11 U.S.C. § 502(b), Fed.

R. Bankr. P. 3003 and 3007, and Local Rule 3007-1 (Docket No. 1023; filed October 18, 2010)

- c. Declaration of Marianne Tawa in Support of the Response of Pivotal Payments, Inc. to (a) Response of Diamond J. Media Inc. and Network Agenda LLC to First Omnibus (Substantive) Objection of the Debtors to Claims Pursuant to 11 U.S.C. § 502(b), Fed. R. Bankr. P. 3003 and 3007, and Local Rule 3007-1; and (B) Response of Diamond J. Media Inc. and JRB Media, Inc. to Second Omnibus (Substantive) Objection of the Debtors to Claims Pursuant to 11 U.S.C. § 502(b), Fed. R. Bankr. P. 3003 and 3007, and Local Rule 3007-1 (Docket No. 1024; filed October 18, 2010)
- d. Signed Order Sustaining First Omnibus (Substantive) Objection of the Debtors to Claims Pursuant to 11 U.S.C. § 502(B), Fed. R. Bankr. P. 3003 and 3007 and Local Rule 3007-1 (Docket No. 1047; entered October 21, 2010)

Status: This matter is going forward with respect to items **d**, e, f, and g. An order on has been entered on the remainder of the claimants.

- 6. Second Omnibus (Substantive) Objection of the Debtors to Claims Pursuant to 11 U.S.C. § 502(b), Fed. R. Bankr. P. 3003 and 3007 and Local Rule 3007-1 (Docket No. 957; filed September 21, 2010)

Objection Deadline: October 14, 2010 at 4:00 p.m.

Informal Responses Received:

- a. Royal Palms Travel d/b/a All Inclusive Excursions
- b. EPay Data, Inc.
- c. Phoenix, LP d/b/a Travel Services, Grand Vacation Club, Grand Vacation Club II and Bon Voyage Travel

Objections Received:

- d. Response of Diamond J. Media, Inc. and JRB Media, Inc. to Second Omnibus (Substantive) Objection of the Debtors to Claims Pursuant to 11 U.S.C. § 502(B), Fed. R. Bankr. P. 3003 and 3007, and Local Rule 3007-1 (Claim Nos.: 56 and 57) (Docket No. 1006; filed October 14, 2010)
- e. Response of Thunder Avenue, LLC d/b/a THINACTION to Debtors' Second Omnibus (Substantive) Objection of the Debtors to Claims Pursuant to 11 U.S.C. § 502(B), Fed. R. Bankr. P. 3003 and 3007 and Local Rule 3007-1 (Docket No. 1012; filed October 14, 2010)

- f. Response of Walnut Street Marketing d/b/a BELLABRITE to Debtors' Second Omnibus (Substantive) Objection to Claims Pursuant to 11 U.S.C. § 502(B), Fed. R. Bankr. P. 3003 and 3007 and Local Rule 3007-1 (Docket No. 1013; filed October 14, 2010)

Related Documents:

- a. Notice of Submission (Docket No. 975; filed September 30, 2010)
- b. Response of Pivotal Payments, Inc. to (a) Response of Diamond J. Media Inc. and Network Agenda LLC to First Omnibus (Substantive) Objection of the Debtors to Claims Pursuant to 11 U.S.C. § 502(b), Fed. R. Bankr. P. 3003 and 3007, and Local Rule 3007-1; and (B) Response of Diamond J. Media Inc. and JRB Media, Inc. to Second Omnibus (Substantive) Objection of the Debtors to Claims Pursuant to 11 U.S.C. § 502(b), Fed. R. Bankr. P. 3003 and 3007, and Local Rule 3007-1 (Docket No. 1023; filed October 18, 2010)
- c. Declaration of Marianne Tawa in Support of the Response of Pivotal Payments, Inc. to (a) Response of Diamond J. Media Inc. and Network Agenda LLC to First Omnibus (Substantive) Objection of the Debtors to Claims Pursuant to 11 U.S.C. § 502(b), Fed. R. Bankr. P. 3003 and 3007, and Local Rule 3007-1; and (B) Response of Diamond J. Media Inc. and JRB Media, Inc. to Second Omnibus (Substantive) Objection of the Debtors to Claims Pursuant to 11 U.S.C. § 502(b), Fed. R. Bankr. P. 3003 and 3007, and Local Rule 3007-1 (Docket No. 1024; filed October 18, 2010)
- d. Signed Order Sustaining Second Omnibus (Substantive) Objection of the Debtors to Claims Pursuant to 11 U.S.C. § 502(B), Fed. R. Bankr. P. 3003 and 3007 and Local Rule 3007-1 (Docket No. 1050; entered October 21, 2010)

Status: This matter is going forward with respect to items **d**, **e**, and **f**. An order on has been entered on the remainder of the claimants.

7. Motion for Order (A) Approving Disclosure Statement; (B) Fixing Voting Record Date; (C) Approving Solicitation and Voting Procedures with Respect to Debtors' Joint Chapter 11 Plan of Liquidation; (D) Approving Form of Solicitation Package and Notices; and (E) Scheduling Certain Dates in Connection Therewith (Docket No. 970; filed September 27, 2010)

Objection Deadline: November 5, 2010 at 4:00 p.m. (extended to November 10, 2010 at 10:00 a.m. for Tribul Merchant Services, LLC, Tribul LLC, and Second Source Funding LLC)

Objections Received:

- a. Objection by Moneris Solutions, Inc. to Disclosure Statement in Respect of the Proposed Joint Plan of Liquidation of CD Liquidation Co., LLC, CD Liquidation Co. Plus, LLC and Cynergy Data Holdings, Inc. (Docket No. 1093; filed November 4, 2010)
- b. **Objection of Tribul Merchant Services, LLC, Tribul LLC, and Second Source Funding LLC to Motion to for Order (A) Approving Disclosure Statement; (B) Fixing Voting Record Date; (C) Approving Solicitation and Voting Procedures with Respect to Debtors' Joint Chapter 11 Plan of Liquidation; (D) Approving Form of Solicitation Package and Notices; and (E) Scheduling Certain Dates in Connection Therewith (Docket No. 1111; filed November 10, 2010)**

Related Documents:

- a. Joint Plan of Liquidation of CD Liquidation Co., LLC, CD Liquidation Co. Plus, LLC, and Cynergy Data Holdings, Inc. (Docket No. 968; filed September 27, 2010)
- b. Disclosure Statement with Respect to Joint Plan of Liquidation of CD Liquidation Co., LLC, Cynergy Data Holdings, Inc. and CD Liquidation Co. Plus, LLC (Docket No. 969; filed September 27, 2010)
- c. **Joint Plan of Liquidation of CD Liquidation Co., LLC, CD Liquidation Co. Plus, LLC, and Cynergy Data Holdings, Inc. (Docket No. 1117; filed November 10, 2010)**
- d. **Disclosure Statement with Respect to Joint Plan of Liquidation of CD Liquidation Co., LLC, Cynergy Data Holdings, Inc. and CD Liquidation Co. Plus, LLC (Docket No. 1118; filed November 10, 2010)**
- e. **Blackline to the Joint Plan of Liquidation of CD Liquidation Co., LLC, CD Liquidation Co. Plus, LLC, and Cynergy Data Holdings, Inc. (Docket No. 1119; filed November 10, 2010)**
- f. **Blackline to the Disclosure Statement with Respect to Joint Plan of Liquidation of CD Liquidation Co., LLC, Cynergy Data Holdings, Inc. and CD Liquidation Co. Plus, LLC (Docket No. 1120; filed November 10, 2010)**

Status: This matter is going forward.

8. Third Omnibus (Non-Substantive) Objection of the Debtors to Claims Pursuant to 11 U.S.C. § 502(b), Fed. R. Bankr. P. 3003 and 3007 and Local Rule 3007-1 (Docket No. 987; filed October 8, 2010)

Objection Deadline: November 5, 2010 at 4:00 p.m.

Objections Received: Informal response by Dymas Funding Company, LLC.

Related Documents: None.

Status: This matter is going forward. The Debtors intend to present a revised proposed order to the Court that addresses the informal response of Dymas Funding Company, LLC.

9. Fifth Omnibus (Substantive) Objection of the Debtors to Claims Pursuant to 11 U.S.C. § 502(b), Fed. R. Bankr. P. 3003 and 3007 and Local Rule 3007-1 (Docket No. 990; filed October 8, 2010)

Objection Deadline: November 5, 2010 at 4:00 p.m.

Informal Objections Received:

- a. Mirian Machuca's Response to Debtors' Objection to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 re: *Claim No. 188* (Docket No. **1107**; filed **November 9, 2010**)
- b. Mirian Machuca's Response to Debtors' Objection to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 re: *Claim No. 202* (Docket No. **1108**; filed **November 9, 2010**)
- c. Kayon Moodie's Response to Debtors' Objection to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 (Docket No. **1100**; filed **November 9, 2010**)
- d. Erika Philip's Response to Debtors' Objection to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 re: *Claim No. 189* (Docket No. **1103**; filed **November 9, 2010**)
- e. Erika Philip's Response to Debtors' Objection to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 re: *Claim No. 201* (Docket No. **1104**; filed **November 9, 2010**)
- f. Nazeema Khan's Response to Debtors' Objection to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 re: *Claim No. 332* (Docket No. **1102**; filed **November 9, 2010**)
- g. Nazeema Khan's Response to Debtors' Objection to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 re: *Claim No. 333* (Docket No. **1101**; filed **November 9, 2010**)
- h. Dura Rura-Acosta's Response to Debtors' Objection to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 re: *Claim No. 382* (Docket No. **1105**; filed **November 9, 2010**)



- i. Dura Rua-Acosta's Response to Debtors' Objection to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 re: *Claim No. 379* (Docket No. **1106**; filed **November 9, 2010**)
- j. Andrea Brock's Response to Debtors' Objection to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 (Docket No. TBD; filed TBD)
- i. Tatyana Benyaminova's Response to Debtors' Objection to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 (Docket No. TBD; filed TBD)
- k. Informal response by Ronald G. Carter.
- l. Informal response by Carl Paladini.
- m. Informal response by Stephen Aschettino.

Objections Received:

- a. Ivonne Canals' Response to Debtors' Objection to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 (Docket No. 1057; filed November 1, 2010)
- b. Anuradha Lall's Objection to Fifth Omnibus (Substantive) Objection of the Debtors to Claims Pursuant to 11 U.S.C. § 502(b), Fed. R. Bankr. P. 3003 and 3007 and Local Rule 3007-1 (Docket No. 1058; filed November 1, 2010)
- c. Michael D'Alauro's Response to Debtors' Objection to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 (Docket No. 1059; filed November 2, 2010)
- d. Christopher Daniels' Response to Debtors' Objection to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 (Docket No. 1060; filed November 2, 2010)
- e. Lynn Sanders' Response to Debtors' Objection to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 (Docket No. 1061; filed November 2, 2010)
- f. Rangi Shivtahal's Response to Debtors' Objection to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 (Docket No. 1063; filed November 2, 2010)
- g. Elizabeth Cabrera's Response to Debtors' Objection to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 (Docket No. 1064; filed November 2, 2010)

- h. Julio C. Arriaga's Response to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 (Docket No. 1065; filed November 2, 2010)
- i. Javier Bension's Response to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 (Docket No. 1066; filed November 2, 2010)
- j. Linette Sanchez's Response to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 (Docket No. 1067; filed November 2, 2010)
- k. Amy Lopez's Response to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 (Docket No. 1068; filed November 2, 2010)
- l. Sandeep Singh's Response to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 (Docket No. 1069; filed November 2, 2010)
- m. Michael Valerio's Response to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 (Docket No. 1070; filed November 2, 2010)
- n. Shawn Brown's Response to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 (Docket No. 1071; filed November 2, 2010)
- o. Melanie A. Ramos' Response to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 (Docket No. 1072; filed November 2, 2010)
- p. Gerardo Acoster's Response to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 (Docket No. 1073; filed November 2, 2010)
- q. Derek Daniels' Response to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 (Docket No. 1074; filed November 2, 2010)
- r. Leonel Castellanos' Response to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 (Docket No. 1075; filed November 2, 2010)
- s. Claudine K. Epps' Response to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 (Docket No. 1076; filed November 2, 2010)

- t. Giovanni DiFebo's Response to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 (Docket No. 1077; filed November 2, 2010)
- u. William DiFebo's Response to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 (Docket No. 1078; filed November 2, 2010)
- v. Imran Siddique's Response to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 (Docket No. 1079; filed November 2, 2010)
- w. Mohammad Ahsan's Response to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 (Docket No. 1080; filed November 2, 2010)
- x. Anuradha Lall's Response to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 (Docket No. 1081; filed November 2, 2010)
- y. Horacio Filet's Response to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 (Docket No. 1082; filed November 2, 2010)
- z. Maritza Veintimilla's Response to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 (Docket No. 1083; filed November 2, 2010)
- aa. Oscar R. Lopez's Response to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 (Docket No. 1084; filed November 2, 2010)
- bb. Andres Ordonez's Response to Claims Pursuant to 11 U.S.C. §502(B), Fed.R.Bankr. P3003 and 3007 and Local Rule 3007-1 (Docket No. 1091; filed November 4, 2010)

Related Document: Notice of Submission of Copies of Proofs of Claim for Fourth and five Omnibus (Substantive) Objection of the Debtors to Claims Pursuant to 11 U.S.C. § 502(B), Fed. R. Bankr. P. 3003 and 3007 and Local Rule 3007-1 (Docket No. 1055; filed October 28, 2010)

Status: Informal responses a through i, informal responses l and m, and all formal responses received to the omnibus objection are adjourned to the December 21, 2010 hearing at 3:30 p.m. The omnibus objection is going forward solely with respect to informal response k and the remaining claims.

**FEE APPLICATIONS OF PROFESSIONALS**

10. Quarterly Fee Applications of the Debtors' and the Committee's Professionals for the Period June 1, 2010 through August 31, 2010.

Objection Deadline: Various. See Exhibit A for relevant fee application.

Related Document: Certification of Counsel Regarding the Quarterly Fee Applications of the Debtors' and the Committee's Professionals for the Period June 1, 2010 through August 31, 2010 (Docket No. 1098; filed November 9, 2010)

Objections Received: None.

Status: No hearing necessary. Counsel requests the proposed order submitted with the Certification of Counsel be entered at the Court's convenience.

Dated: November 10, 2010  
Wilmington, Delaware

Respectfully submitted,  
  
PEPPER HAMILTON LLP

/s/ Evelyn J. Meltzer  
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*Counsel for the Debtors  
and Debtors in Possession*

# EXHIBIT A

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

In re:

CD LIQUIDATION CO. PLUS, LLC, f/k/a  
CYNERGY DATA, LLC, *et al.*,<sup>2</sup>  
Debtors.

Chapter 11

Case No. 09-13038 (KG)

Jointly Administered

**Hearing Date: November 12, 2010 at 11:00 a.m.**

**INDEX TO FEE APPLICATION BINDER FOR  
HEARING SCHEDULED ON NOVEMBER 12, 2010 AT 11:00 A.M.**

**DEBTORS' PROFESSIONALS**

1. Notice of Fourth Quarterly Fee Application Request of Pepper Hamilton LLP as Co-Counsel to the Debtors (Docket No. 1008; filed October 14, 2010)

Related Documents:

- a. Ninth Interim Application of Pepper Hamilton LLP for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred as Counsel to the Debtors for the Period June 1, 2010 through June 30, 2010 (Docket No. 839; filed July 22, 2010)
- b. Certificate of No Objection (Docket No. 877; filed August 17, 2010)
- c. Tenth Interim Application of Pepper Hamilton LLP for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred as Counsel to the Debtors for the Period July 1, 2010 through August 31, 2010 (Docket No. 952; filed September 21, 2010)
- d. Certificate of No Objection (Docket No 1007; filed October 14, 2010)

2. Notice of Amended Fourth Quarterly Fee Application Request of Nixon Peabody LLP as Co-Counsel to the Debtors (Docket No 1003; filed October 14, 2010)

Related Documents:

- a. Tenth Monthly Application of Nixon Peabody LLP, Counsel for the Debtors, for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred from June 1, 2010 through June 30, 2010 (Docket No. 816; filed July 12, 2010)

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<sup>2</sup> The Debtors are the following entities (with the last four digits of their federal tax identification numbers in parentheses): Cynergy Data, LLC (8677); Cynergy Data Holdings, Inc. (8208); Cynergy Prosperity Plus, LLC (4265). The mailing address for the Debtors is 30-30 47th Avenue, 9th Floor, Long Island City, New York 11101.

- b. Certificate of No Objection (Docket No 853; filed August 4, 2010)
  - c. Eleventh Monthly Application of Nixon Peabody LLP, Counsel for the Debtors, for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred from July 1, 2010 through July 31, 2010 (Docket No. 868; filed August 11, 2010)
  - d. Certificate of No Objection (Docket No. 915; filed September 3, 2010)
  - e. Twelfth Monthly Application of Nixon Peabody LLP, Counsel for the Debtors, for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred from August 1, 2010 through August 31, 2010 (Docket No. 937; filed September 13, 2010)
  - f. Certificate of No Objection (Docket No 986; filed October 6, 2010)
3. Notice of Fourth Quarterly Fee Application Request of CM&D Management Services LLC as Financial Advisors to the Debtors (Docket No. 1002; filed October 14, 2010)

Related Documents:

- a. Tenth Monthly Application of CM&D Management Services LLC as Financial Advisor to the Debtors and Debtors-in-Possession for Compensation and Reimbursement of Expenses Incurred for the Period June 1, 2010 through June 30, 2010 (Docket No. 822; filed July 13, 2010)
- b. Certificate of No Objection (Docket No. 859; filed August 6, 2010)
- c. Eleventh Monthly Application of CM&D Management Services LLC as Financial Advisor to the Debtors and Debtors-in-Possession for Compensation and Reimbursement of Expenses Incurred for the Period July 1, 2010 through July 31, 2010 (Docket No. 866; filed August 10, 2010)
- d. Certificate of No Objection (Docket No. 914; filed September 3, 2010)
- e. Twelfth Monthly of CM&D Management Services LLC as Financial Advisor to the Debtors and Debtors-in-Possession for Compensation and Reimbursement of Expenses Incurred for the Period August 1, 2010 through August 31, 2010 (Docket No. 924; filed September 10, 2010)
- f. Certificate of No Objection (Docket No. 981; filed October 5, 2010)

## **COMMITTEE'S PROFESSIONALS**

4. Fourth Interim Fee Application of Ashby & Geddes, P.A. for the Period of June 1, 2010 through August 31, 2010 (Docket No. 1016; filed October 15, 2010)

### Related Documents:

- a. Tenth Monthly Application of Ashby & Geddes, P.A. as Delaware Counsel to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period of June 1, 2010 through June 30, 2010 (Docket No. 851; filed August 3, 2010)
  - b. Certificate of No Objection (Docket No. 901; filed August 25, 2010)
  - c. Eleventh Monthly Application of Ashby & Geddes, P.A. as Delaware Counsel to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period of July 1, 2010 through July 31, 2010 (Docket No. 905; filed August 27, 2010)
  - d. Certificate of No Objection (Docket No. 950; filed September 20, 2010)
  - e. Twelfth Monthly Application of Ashby & Geddes, P.A. as Delaware Counsel to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period of August 1, 2010 through August 31, 2010 (Docket No. 974; filed September 30, 2010)
  - f. Certificate of No Objection (Docket No 1052; filed October 22, 2010)
5. Fourth Interim Fee Application of Jager Smith P.C. Compensation for Services Rendered and Reimbursement of Expenses as Counsel to the Unsecured Creditors for the Period of June 1, 2010 through August 31, 2010 (Docket No. 1019; Filed October 15, 2010)

### Related Documents:

- a. Tenth Monthly Application of Jager Smith P.C. for Compensation for Services Rendered and Reimbursement of Expenses as Counsel to the Official Committee of Unsecured Creditors for the Period from June 1, 2010 through June 30, 2010 (Docket No. 823; filed July 13, 2010)
- b. Certificate of No Objection (Docket No. 860; filed August 9, 2010)
- c. Eleventh Monthly Application of Jager Smith P.C. for Compensation for Services Rendered and Reimbursement of Expenses as Counsel to the Official Committee of Unsecured Creditors for the Period from July 1,



2010 through July 31, 2010 (Docket No. 871; filed August 16, 2010)

- d. Certificate of No Objection (Docket No. 923; filed September 9, 2010)
- e. Twelfth Monthly Application of Jager Smith P.C. for Compensation for Services Rendered and Reimbursement of Expenses as Counsel to the Official Committee of Unsecured Creditors for the Period from February 1, 2010 through February 18, 2010 (Docket No. 963; filed September 23, 2010)
- f. Certificate of No Objection (Docket No. 1018; filed October 15, 2010)

- 6. First Interim Application of Stout Risius Ross, Inc. for the Period of July 30, 2010 through August 31, 2010 (Docket No. 1017; filed October 15, 2010)

Related Documents:

- a. First Monthly Fee Application of Stout Risius Ross, Inc for Compensation Incurred for the Period from July 30, 2010 through August 31, 2010 (Docket No. 978; October 1, 2010)
- b. Certificate of No Objection (Docket No. 1054; filed October 25, 2010)