

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

)	
In re:)	Chapter 11
)	
ENERGY FUTURE HOLDINGS CORP., <i>et al.</i> , ¹)	Case No. 14-10979 (CSS)
)	
Debtors.)	(Jointly Administered)
)	
)	Re: D.I. 4978, 4979, 5251, 6778

**CERTIFICATION OF COUNSEL REGARDING
“TWENTY-THIRD OMNIBUS (SUBSTANTIVE) OBJECTION
TO (CERTAIN IMPROPERLY ASSERTED) CLAIMS PURSUANT
TO SECTION 502(b) OF THE BANKRUPTCY CODE, BANKRUPTCY
RULES 3001, 3003, AND 3007 AND LOCAL BANKRUPTCY RULE 3007-1” [D.I. 4978]**

The undersigned hereby certifies as follows:

1. On July 10, 2015, Energy Future Holdings Corp. (“EFH Corp.”), one of the above-captioned debtors and debtors in possession, filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Twenty-Third Omnibus (Substantive) Objection to (Certain Improperly Asserted) Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, and 3007 and Local Bankruptcy Rule 3007-1* [D.I. 4978] (the “Objection”).² On July 10, 2015, EFH Corp. also filed the *Declaration of Michael Carter in Support of the Twenty-Third Omnibus (Substantive) Objection to (Certain Improperly Asserted) Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, and*

¹ The last four digits of Energy Future Holdings Corp.’s tax identification number are 8810. The location of the debtors’ service address is 1601 Bryan Street, Dallas, Texas 75201. Due to the large number of debtors in these chapter 11 cases, which are being jointly administered, a complete list of the debtors 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 debtors’ claims and noticing agent at <http://www.efhcaseinfo.com>.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Objection.

3007 and Local Bankruptcy Rule 3007-1 [D.I. 4979] in connection with, and in support of the relief requested in, the Objection.

2. Responses to the Objection were to be filed on or before 4:00 p.m. (Eastern Daylight Time) on July 24, 2015 (the “Response Deadline”).

3. Prior to the Response Deadline, EFH Corp. received two informal responses from the following claimants (together, the “Claimants”) with respect to which EFH Corp. adjourned the Objection:

- Tannor Partners Credit Fund L.P. (“Tannor”) regarding the Objection with respect to Proof of Claim number 2221 seeking to modify the asserted debtor and the asserted amount of the claim.
- Reddy Ice Corp. (“Reddy Ice”) regarding the Objection with respect to Proof of Claim number 3250 seeking to modify the asserted debtor and the asserted amount of the claim. A portion of the claims asserted in Proof of Claim number 3250 was transferred to Liquidity Solutions, Inc. (“LSI”).

4. On August 10, 2015, the Court entered the *Order Sustaining Twenty-Third Omnibus (Substantive) Objection to (Certain Improperly Asserted) Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, and 3007 and Local Bankruptcy Rule 3007-1* [D.I. 5251].

5. On October 30, 2015, the Court entered the *Order (Second) Sustaining Twenty-Third Omnibus (Substantive) Objection to (Certain Improperly Asserted) Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, and 3007 and Local Bankruptcy Rule 3007-1* [D.I. 6778] (the “Second Order Sustaining Twenty-Third Omnibus Objection to Claims”).

6. Following the entry of the Second Order Sustaining Twenty-Third Omnibus Objection to Claims:

- Tannor informed EFH Corp. that it does not object to the Wrong Debtor Basis for Objection to its asserted claim, but maintains it asserted the proper amount of the claim. EFH Corp. agrees with Tannor with respect to the amount of the asserted claim and is withdrawing the Objection solely as it relates to the Modify Amount Basis for Objection.
- LSI has informed EFH Corp. that it does not oppose the Objection. EFH Corp. has provided a reconciliation (the “Reconciliation”) of Proof of Claim number 3250 to Reddy Ice on three separate occasions without receiving a response. On September 28, 2016, counsel for EFH Corp. sent a letter to Reddy Ice stating that unless counsel receives a response to the Reconciliation by October 7, 2016 then EFH Corp. would assume Reddy Ice does not object to the Reconciliation or to the granting of the Objection as it relates to Proof of Claim number 3250. EFH Corp. did not receive any response from Reddy Ice, and EFH Corp. assumes that Reddy Ice does not oppose the granting of the Objection with respect to Proof of Claim number 3250.

7. Therefore, EFH Corp. seeks entry of an order, substantially in the form attached hereto as **Exhibit A**, resolving the Objection solely with respect to the Proofs of Claim filed by the Claimants.

[Remainder of page intentionally blank]

WHEREFORE, EFH Corp. respectfully requests that the Court enter the proposed order, substantially in the form attached hereto as **Exhibit A**, at the convenience of the Court.

Wilmington, Delaware
Dated: October 18, 2016

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