

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

IN RE: :
THE ANTIOCH COMPANY, etal : Case No. 08-35741
: Chapter 11
Debtors : Judge Humphries

**MOTION BY CREDITOR, LUZ BETANCUR, A CLASS 5 UNSECURED
CREDITOR TO SET HEARING ON HER MOTION FOR LEAVE TO SUBMIT
CLASS 5 RELEASE FORM, TO ELECT TO RECEIVE
CREDITOR/EQUITYHOLDER TRUST INTEREST ESTABLISHED PURSUANT
TO SECTION 5.12 OF THE DEBTORS' JOINT PRE-PACKAGED PLAN OF
REORGANIZATION AND TO PARTICIPATE AS A BENEFICIARY OF THE
LITIGATION TRUST ESTABLISHED PURSUANT SECTION 5.13 OF SAME,
OUTSIDE THE TIME LIMITS PREVIOUSLY ESTABLISHED**

Now comes, Luz Betancur [who holds a Class 5 Claim in the amount of \$70,500.39], by and through counsel, and hereby moves the Court to set a hearing on her Motion pursuant to Rule 9006(b)(1) of the Federal Rules of Bankruptcy Procedure for Leave to Submit her Class 5 Release Form, to Elect to Receive Creditor/Equity Holder Trust Interest Established Pursuant to Section 5.12 of the Debtors' Joint Pre-packaged Plan of Reorganization and to Participate as a Beneficiary of the Litigation Trust Established Pursuant to Section 5.13 of Same, Outside the Time Limits Previously Established by the Court ["the Motion"]. It is respectfully requested that the matter be set for hearing at 9:30 a.m. on December 30, 2010, the same time having been previously set by the Court to hear other matters related to this case, including the Debtor's Motion to Close the Case.

WOOD & LAMPING, LLP

By: Henry E. Menninger, Jr.

Henry E. Menninger, Jr.

Ohio Reg. # 0013511

Attorney for Movant

Luz Betancur

600 Vine Street

Cincinnati, Ohio 45202

(513) 852-6033

Email:hemenninger@woodlamping.com

CERTIFICATE OF SERVICE

I hereby certify that on December 15, 2010 a copy of the foregoing Motion was served via CM/ECF noticing on all counsel and parties designated therein, and by first class U.S. Mail, postage pre-paid, on each of the persons set forth below:

W. Timothy Miller, Esq.
Trustee of The Antioch Company Litigation Trust
Taft Stettinius & Hollister LLP
425 Walnut Street, Suite 1800
Cincinnati, Ohio 45202

Joseph Clark
Wilmington Trust FSB, Trustee of the Antioch Company
Creditor/Equityholder Trust
Corporate Capital Markets
166 Mercer Street, Suite 2R
New York, NY 10012

Luz Betancur
1770 Gault Way
Sparks, NV 89431

By E-Mail

Tony M. Alexander
talexander@jpolawyers.com

Marcia Voorhis Andrew
Andrew@taftlaw.com, docket@taftlaw.com

Asst. US Trustee (Day)
USTPRegion09.CB.ECF@usdoj.gov

Phillip Bohl
Phillip.bohl@gpmlaw.com

J. Michael Debbeler
mdebbeler@graydon.com

Chris L. Dickerson
Chris.dickerson@skadden.com, rena.samole@skadden.com

Jeremy Shane Flannery
Jeremy.S.Flannery@usdoj.gov

Patricia Jo Fokuo
pfokuo@schiffhardin.com, edocket@schiffhardin.com

Victoria D. Garry
vgarry@ag.state.oh.us

Robert G. Hanseman
rhanseman@ssdlaw.com, kroeckner@ssdlaw.com

Kenneth C. Johnson
kjohnson@bricker.com, rdelsignore@bricker.com

Michael J. Kaczka
mkaczka@mcdonaldhopkins.com, bkfilings@mcdonaldhopkins.com

Donald W. Mallory
Donald.mallory@dinslaw.com, Christopher.loeckel@dinslaw.com

Sean D. Malloy
smalloy@mcdonaldhopkins.com, bkfilings@mcdonaldhopkins.com

Richard M. Maseles
sdoh@dor.mo.gov

W. Timothy Miller
miller@taftlaw.com, grote@taftlaw.com, docket@taftlaw.com

Thomas R. Noland
notices@dayton.statmanharris.com

Jack R. Pigman
jpigman@porterwright.com

Ronald S. Pretekin
pretekin@coollaw.com, piatt@coollaw.com

Robert G. Sanker
rsander@kmklaw.com

Beth A. Silvers
Silvers@taftlaw.com, docket@taftlaw.com

Richard K. Stovall
Stovall@aksnlaw.com, duraney@aksnlaw.com, ashton@aksnlaw.com,
doan@aksnlaw.com, six@aksnlaw.com

Jon C. Vigano
jvigano@schiffhardin.com, pfokuo@schiffhardin.com

Michael B. Willey
agbankohio@ag.tn.gov, Michael.willey@ag.tn.gov

Mary Ann Wilsbacher
MaryAnne.Wilsbacher@usdoj.gov

Brian Wood
colecfsdo@weltman.com

Amy A. Zuccarello
azuccarello@eapdlaw.com

/s/ Henry E. Menninger, Jr.
Henry E. Menninger, Jr.
Ohio Reg. # 0013511
Attorney for Movant
Luz Betancur
600 Vine Street
Cincinnati, Ohio 45202
(513) 852-6033
Email:hemenninger@woodlamping.com