

CLAIMANT

Hall, Timothy M. (pro se)  
234 Riverbank  
Burlington, NJ  
08016

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re

Chapter 11

AMR CORPORATION, et al.,

Case No. 11-15463 (SHL)

Reorganized Debtors.

(Jointly Administered)

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Re. Claim 11351

**OBJECTION TO REORGANIZED DEBTOR’S MOTION FOR ORDER (I) AUTHORIZING (A) RELEASE OF EXCESS RESERVE FUNDS HELD IN DISPUTED CLAIMS RESERVE AND (B) REIMBURSEMENT OF OF PREPETITION CLAIM; (II) CLOSING THE CHAPTER 11 CASE; AND (III) GRANTING RELATED RELIEF [ECF. No. 13369]**

TO THE HONORABLE SEAN H. LANE  
UNITED STATES BANKRUPTCY JUDGE

Your Honor, I hereby submit my objection to the Reorganized Debtor’s Motion based upon the following:

In support of their motion, the Debtor provides the basis – #36 (p. 12) "Substantially all disputed claims have been resolved and satisfied."

While this Claimant understands “substantially” is most likely determined at the discretion of this Court, it remains an undisputed fact, my claim (Claim 11351) most recently disputed by the Debtor in their 199<sup>th</sup> Omnibus Objection to Claims and subsequent evidentiary hearing (June 2021) remains unsatisfied, and awaits Your Honor’s Judgement and Ruling of Law on (same) Debtor’s 199<sup>th</sup> Omnibus Objection to Claims.

Further, my review of the contents of the Docket (pleadings, Judicial Record, Rulings) shows neither a settlement nor a resolution of my claim (11351) is addressed in general terms, nor is it specifically identified/addressed in any of the pleadings submitted by the Debtor, nor in any of the pleadings submitted by the Allied Pilots Association, nor by any other party subsequent to this Court’s 7 June 2021

evidentiary hearing (hearing to include Debtor's 199<sup>th</sup> Omnibus Objection to Claims.) It follows therefore, my claim, while disputed by the Debtor, remains unsatisfied and unresolved. Additionally, Counsel for the Debtor and I agree, the Debtor never provided me legal notice of their motion until doing so by email, approximately 29 hours prior to the response deadline for their motion. Restated, I was never noticed by mail, and when I was first made aware of the Debtor's motion and the corresponding deadline to oppose such motion, it was via e-mail (from Debtor's Counsel) at approximately noontime on the day prior to the deadline to submit this "objection".

Based upon the aforesaid, I respectfully request this Court order the Debtor to satisfy my claim in full, as a precondition, if Your Honor decides to allow the Debtor's motion; or to stay or disallow the Debtor's motion until such time as my claim is otherwise satisfied, or ruled upon by this Court.

Signed /s/Timothy M. Hall, pro se

28 October 2021