

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(GREENBELT DIVISION)**

In re:

CREATIVE HAIRDRESSERS, INC., *et al.*,

Debtors.

Chapter 11

Case Nos. 20-14583, 20-14584 TJC

(Jointly Administered)

**LIMITED OBJECTION OF SIMON PROPERTY GROUP, INC. TO DEBTORS' CLAIM
NOTICE OF PROPOSED REJECTION LANDLORD ADMINISTRATIVE CLAIMS**

Simon Property Group, Inc. on behalf of itself and its affiliated entities (“Simon” or “Landlord”), by its undersigned counsel, Joyce A. Kuhns of Offit Kurman, P.A., hereby files its Limited Objection of Simon Property Group, Inc. to *Debtors' Claim Notice of Proposed Rejection Landlord Administrative Claims* [ECF No. 560] (“Notice”). In support of the same, Simon states as follows:

BACKGROUND

1. The Debtors commenced these above-captioned cases by filing voluntary petitions for relief under Chapter 11 of the Bankruptcy Code on April 23, 2020.
2. On June 15, 2020, this Court entered an Amended Order Granting Motion to Approve Procedures for Payment of Certain Post-Petition Rent Claims for Rejected Leases [ECF No. 525] (“Order”).
3. On June 25, 2020, in accordance with the Order, Debtors filed the Notice asserting the proposed amounts for each Rejection Landlord’s Administrative Claim.

OBJECTION TO REJECTION LANDLORD ADMINISTRATIVE CLAIMS

4. The Debtors have rejected four (4) leases of non-residential real property with Simon (individually, “Lease” or collectively, “Leases”) as more particularly described in Simon’s Administrative Claim Schedule, below:

Administrative Claim Schedule

Property	Lease	Debtor's Admin Amount	Simon's Admin Amount
Fashion Center at Pentagon Center	Bubbles – Store 1376	\$37,181.40	\$40,911.85
Potomac Mall	Bubbles – Store 2378	\$2,380.22	\$3,808.34
Fashion Center at Pentagon Center	Salon Cielo & Spa – Store 129	\$35,174.1	\$38,713.57
Town Center at Boca Raton	Salon Cielo & Spa – Store 140	\$11,773.02	\$11,773.02
	Totals:	\$86,508.83	\$90,271.49

5. Simon has reached out to the Debtors in an attempt to resolve the dispute but has been unable to do so prior to the objection deadline.

6. Simon is not in agreement with the amounts asserted in the Notice as they do not accurately reflect all amounts due under the Leases from the Petition Date through and including the effective date of rejection as detailed in Administrative Claim Schedule. Simon therefore requests that its post-petition, pre-rejection administrative claims be allowed in the amounts set forth in Simon’s Administrative Schedule contained in this Limited Objection.

WHEREFORE, Simon Property Group, Inc. and its related affiliates dispute the proposed rejection administrative claims for its Leases set out in the Notice, request that such claims be increased and allowed in the amounts set forth in its Administrative Claim Schedule, and that the Court grant such other relief as it deems just and proper.

Dated: July 6, 2020

/s/ Joyce A. Kuhns

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*Attorney for Simon Property Group, Inc.
and its related Affiliates*

CERTIFICATE OF SERVICE

I certify that on this 6th day of July, 2020, a true and correct copy of the foregoing was served via the Court's CM/ECF system on the following registered users who have noticed an appearance in this matter:

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