

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF COLORADO**

**IN RE:**

**SKLAR EXPLORATION COMPANY, LLC**

**DEBTOR**

**SKLARCO, LLC**

**DEBTOR.**

**CASE NO. 20-12377-EEB  
CHAPTER 11**

**CASE NO. 20-12380-EEB  
CHAPTER 11**

**ALLY BANK'S RESPONSE TO DEBTOR'S OBJECTION TO PROOF OF CLAIM  
AND REQUEST FOR HEARING**

COMES NOW Ally Bank ("Ally"), secured creditor in the above bankruptcy case with a security interest in the 2018 Ford F-150, VIN: 1FTEW1CP6JKE16174 ("Collateral"), by and through its undersigned counsel, respectfully files its response to Debtor's Objection to Proof of Claim (Doc.1717) as follows:

1. Ally admits the allegations of paragraph 1.
2. Ally admits the allegations of paragraph 2.
3. Ally admits the allegations of paragraph 3.
4. Ally admits that it filed a Proof of Claim on June 4, 2020 in the amount of \$26,189.19, but denies the remainder of the allegations of paragraph 4. Ally's Proof of Claim is Claim Number 52.
5. Ally admits the allegations of paragraph 5.
6. Ally denies the allegations of paragraph 6.
7. Ally denies the allegations of paragraph 7.

8. Debtor has not yet surrendered the Collateral to Ally. Once the Collateral is surrendered, Ally needs time to liquidate the Collateral. Once the collateral is liquidated, Ally will amend the claim for any deficiency balance.

9. Ally hereby requests a hearing on the Objection.

WHEREFORE, Ally asks the Court to overrule Debtor's Objection to Proof of Claim and for such other and further relief to which it is justly entitled.

DATED this 29th day of April 2022

Respectfully submitted:

SNOW, CHRISTENSEN & MARTINEAU

/s/ P. Matthew Cox

P. Matthew Cox, 9879 UT  
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**CERTIFICATE OF SERVICE**

I hereby certify that on April 29, 2022, a true and correct copy of the above Response shall be served via electronic means, if available, or as otherwise noted by regular, first-class mail, to:

Debtor via US Mail: Sklar Exploration Company, LLC, 5395 Pearl Parkway, Suite 200, Boulder, CO 80301

Debtor via US Mail: Sklarco, LLC, 5395 Pearl Parkway, Suite 200, Boulder, CO 80301

Counsel for Debtor via US Mail: Jeffrey S. Brinen, Kutner Brinen Dickey Riley, P.C., 1660 Lincoln St, Suite 1720, Denver, CO 80264

US Trustee via US Mail: Byron G. Rogers Federal Building, 1961 Stout St., Ste. 12-200, Denver, CO 80294

The Official Committee of Unsecured  
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/s/ P. Matthew Cox