## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:

NPC INTERNATIONAL, INC.<sup>1</sup>

Chapter 11

Case No. 20–33353 (DRJ)

Debtor.

# MOTION OF THE NPC INTERNATIONAL GUC TRUST FOR AN ORDER (I) FURTHER EXTENDING THE DEADLINE BY WHICH THE NPC INTERNATIONAL GUC TRUST MAY <u>REMOVE CIVIL ACTIONS; AND (II) GRANTING RELATED RELIEF</u>

IF YOU OBJECT TO THE RELIEF REQUESTED, YOU MUST RESPOND IN WRITING. UNLESS OTHERWISE DIRECTED BY THE COURT, YOU MUST FILE YOUR RESPONSE ELECTRONICALLY AT HTTPS://ECF.TXSB.USCOURTS.GOV/ WITHIN TWENTY-ONE DAYS FROM THE DATE THIS MOTION WAS FILED. IF YOU DO NOT HAVE ELECTRONIC FILING PRIVILEGES, YOU MUST FILE A WRITTEN OBJECTION THAT IS ACTUALLY RECEIVED BY THE CLERK WITHIN TWENTY-ONE DAYS FROM THE DATE THIS MOTION WAS FILED. OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

U.S. Bank National Association, solely in its capacity as trustee (the "<u>GUC</u> <u>Trustee</u>") of the NPC International GUC Trust (the "<u>GUC Trust</u>") by and through its undersigned counsel, hereby moves this Court (the "<u>Motion</u>"), pursuant to 28 U.S.C. § 1452 and Rules 9006 and 9027 of the Federal Rules of Bankruptcy Procedure (the "<u>Bankruptcy Rules</u>"), and Rule 9013-1 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of Texas (the "<u>Local Rules</u>") for entry of an order substantially in the form attached hereto as **Exhibit A** (the "Proposed Order") further extending the period within which

<sup>&</sup>lt;sup>1</sup> The Debtors in these chapter 11 cases, are NPC International, Inc. ("<u>NPCI</u>"); NPC Restaurant Holdings I LLC; NPC Restaurant Holdings, ILC; NPC Holdings, Inc.; NPC International Holdings, LLC; NPC Restaurant Holdings, LLC; NPC Operating Company B, Inc.; and NPC Quality Burgers, Inc. On June 25, 2021, the Court entered a final decree closing each of the chapter 11 cases other than NPCI's chapter 11 case [Docket No. 1785]. Commencing on June 25, 2021, all motions, notices and other pleadings relating to any of the Debtors shall be filed in NPCI's chapter 11 case.

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the GUC Trust may seek to remove actions to federal district court from September 20, 2022 through and including January 18, 2023. In support of this Motion the GUC Trust respectfully states as follows:

#### BACKGROUND

1. On July 1, 2020 (the "<u>Petition Date</u>"), the Debtors each commenced with this Court a voluntary case under chapter 11 of title 11 of the United States Code (the "<u>Bankruptcy</u> <u>Code</u>"). From and after the Petition Date, the Debtors continued to operate as debtors in possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.

2. As of the Petition Date, the Debtors were party to a number of civil actions pending in various forums (collectively, the "<u>Prepetition Actions</u>").

3. On September 28, 2020, the Debtors filed the *Motion of Debtors for an Order (I) Extending the Deadline by Which the Debtors May Remove Civil Actions, and (II) Granting Related Relief*, seeking to extend the deadline by which they may file notices of removal under Bankruptcy Rule 9027(a), by 120 days from September 29, 2020, to January 27, 2021, which was approved by order dated October 26, 2020.<sup>2</sup>

4. On January 21, 2021, the Debtors filed the *Motion of Debtors for an Order* (*I*) *Further Extending the Deadline by Which the Debtors May Remove Civil Actions, and* (*II*) *Granting Related Relief*, seeking to further extend the deadline by which they may file notices of removal under Bankruptcy Rule 9027(a), by 120 days from January 27, 2021 to May 27, 2021, which was approved by order dated February 25, 2021.<sup>3</sup>

<sup>&</sup>lt;sup>2</sup> Docket Nos. 725, 898.

<sup>&</sup>lt;sup>3</sup> Docket Nos. 1460, 1570.

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5. On January 26, 2021, the Debtors filed the Second Amended Joint Chapter 11 Plan of NPC International, Inc. and Its Affiliated Debtors (the "Plan").<sup>4</sup> On January 29, 2021, the Bankruptcy Court entered the Findings of Fact, Conclusions of Law, and Order Confirming Second Amended Joint Chapter 11 Plan of NPC International, Inc. and Its Affiliated Debtors (the "Confirmation Order").<sup>5</sup>

6. Among other things, the Confirmation Order approved the creation of the GUC Trust. On March 31, 2021, all conditions to effectiveness of the Plan occurred and the Plan became effective (the "<u>Effective Date</u>"). In accordance with the Plan, the GUC Trust's responsibilities include, among other things, the reconciliation of certain general unsecured claims asserted against the Debtors in the chapter 11 cases.

7. On May 26, 2021, the GUC Trust filed the *Motion of NPC International GUC Trust for an Order (I) Extending the Deadline by Which the NPC International GUC Trust May Remove Civil Actions, and (II) Granting Related Relief*, seeking to further extend the deadline by which notices of removal may be filed under Bankruptcy Rule 9027(a) by 120 days from May 27, 2021 to September 24, 2021, which was approved by order dated July 19, 2021.<sup>6</sup>

8. On September 20, 2021, the GUC Trust filed the *Motion of NPC International GUC Trust for an Order (I) Further Extending the Deadline by which the NPC International GUC Trust May Remove Civil Actions, and (II) Granting Related Relief*, seeking to further extend the deadline by which notices of removal may be filed under Bankruptcy Rule

<sup>&</sup>lt;sup>4</sup> Docket No. 1477. Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Plan.

<sup>&</sup>lt;sup>5</sup> Docket No. 1528

<sup>&</sup>lt;sup>6</sup> Docket No. 1718, 1845.

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9027(a) by 120 days from September 24, 2021 to January 22, 2022, which was approved by order dated October 20, 2021.<sup>7</sup>

9. On January 21, 2022, the GUC Trust filed the *Motion of NPC International GUC Trust for an Order (I) Further Extending the Deadline by which the NPC International GUC Trust May Remove Civil Actions, and (II) Granting Related Relief*, seeking to further extend the deadline by which notices of removal may be filed under Bankruptcy Rule 9027(a) by 121 days from January 22, 2022 to May 23, 2022, which was approved by order dated February 16, 2022.<sup>8</sup>

10. On April 14, 2022, the Court entered the *Second Order Extending Deadline to Object to Claims*, extending the GUC Trust's deadline to object to General Unsecured Claims to September 22, 2022, subject to further extension upon motion by the GUC Trustee or the Plan Administrator.<sup>9</sup>

11. On May 20, 2022, the GUC Trust filed the *Motion of NPC International GUC Trust for an Order (I) Further Extending the Deadline by which the NPC International GUC Trust May Remove Civil Actions, and (II) Granting Related Relief*, seeking to further extend the deadline by which notices of removal may be filed under Bankruptcy Rule 9027(a) by 120 days from May 23, 2022 to September, 2022, which was approved by order dated May 24, 2022.<sup>10</sup>

12. On September 14, 2022, the NPC International, Inc., Liquidating trust and the GUC Trust jointly filed the *Third Joint Motion of NPC International, Inc., Liquidating Trust and NPC International GUC Trust for an Order Extending Deadline to Object to Claims*, seeking

<sup>&</sup>lt;sup>7</sup> Docket Nos. 1924, 1978.

<sup>&</sup>lt;sup>8</sup> Docket Nos. 2049, 2075.

<sup>&</sup>lt;sup>9</sup> Docket No. 2113.

<sup>&</sup>lt;sup>10</sup> Docket Nos. 2152, 2156.

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to further extend the GUC Trust's deadline to object to General Unsecured Claims from September 22, 2022 to March 21, 2023.<sup>11</sup>

13. Since the Effective Date, the GUC Trust has been actively reviewing and reconciling the more than 2,000 proofs of claim filed in these chapter 11 cases, which assert, at least in part, General Unsecured Claims (not including Driver Claimant General Unsecured Claims).<sup>12</sup> These efforts have included, and will continue to include, work to resolve claims that remain subject to litigation pending in other jurisdictions, including the Prepetition Actions. To date, the GUC Trust has filed six omnibus claims objections seeking to expunge approximately 670 General Unsecured Claims.<sup>13</sup> The GUC Trust has also filed a notice of scheduled claims superseded by filed proofs of claim, for which it has filed a certificate of counsel.

14. In connection with the reconciliation of a number of the Prepetition Actions,

on May 25, 2021, the Court entered the *Order Establishing Alternative Dispute Resolution Procedures*, establishing procedures to resolve personal injury and wrongful death claims (the "<u>ADR Procedures</u>").<sup>14</sup> As of the date hereof, claims by more than 50 claimants asserting claims in excess of \$65 million (excluding unliquidated amounts) have been included in the ADR

<sup>&</sup>lt;sup>11</sup> Docket No. 2230.

<sup>&</sup>lt;sup>12</sup> On September 2, 2021, the Court entered the *Order (A) Approving Omnibus Claims Objection Procedures, (B) Waiving the Requirement of Bankruptcy Rule 3007(E)(6), and (C) Granting Related Relief* [Docket No. 1878], establishing procedures for objections to claims on an omnibus basis on the grounds set forth in Bankruptcy Rule 3007(d) and on certain additional approved grounds.

<sup>&</sup>lt;sup>13</sup> See First Omnibus Objection of the NPC International GUC Trust to Certain Late-Filed Claims [Docket No. 1993]; Second Omnibus Objection of the NPC International GUC Trust to Certain (A) Duplicative Claims and (B) Amended and Superseded Claims [Docket No. 1994]; Third Omnibus Objection of the NPC International GUC Trust to Deferred Compensation Claims (No Liability Claims) [Docket 2024]; Fourth Omnibus Objection of the NPC International GUC Trust to Certain Satisfied Claims [Docket 2034]; Fifth Omnibus Objection Of The NPC International GUC Trust To Certain (A) Satisfied Claims; (B) Late-Filed Claims; (C) Amended And Superseded Claims; (D) Insufficient Documentation Claims; and (E) Reclassified Claims [Docket 2134]; Sixth Omnibus Objection Of The NPC International GUC Trust To Certain (I) No Liability Claims and (II) Overstated Claims [Docket 2135].

<sup>&</sup>lt;sup>14</sup> Docket No. 1714.

Procedures. To date, the GUC Trust has reached settlements with approximately 85% of these claimants and is continuing negotiations with the remaining claimants subject to the ADR Procedures. The GUC Trust may also include additional personal injury claims in the ADR process. Given the GUC Trust's role in this reconciliation process, the GUC Trust seeks to preserve the right of removal to the extent resolution cannot be achieved during the ADR process.

#### **RELIEF REQUESTED**

15. Pursuant to 28 U.S.C. § 1452, Bankruptcy Rules 9006(b) and 9027, and Local Rule 9013-1, the GUC Trust requests entry of an order extending the deadline by which the GUC Trust may file notices of removal under Bankruptcy Rule 9027(a) (the "<u>Removal Deadline</u>") for 120 days from the current deadline of September 20, 2022 to January 18, 2023.<sup>15</sup> A proposed form of order granting the relief requested herein is annexed hereto as <u>Exhibit A</u>.

#### **JURISDICTION**

16. The Court has jurisdiction to consider this matter pursuant to 28 U.S.C.

§ 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicates for the relief requested in this Motion are 28 U.S.C. §1452 and Bankruptcy Rules 9006 and 9027.

#### **BASIS FOR RELIEF REQUESTED**

17. Bankruptcy Rule 9027 and 28 U.S.C. § 1452 govern the removal of pending

civil actions. Specifically, section 1452(a) provides in pertinent part, that:

A party may remove any claim or cause of action in a civil action other than a proceeding before the United States Tax Court or a civil action by a

<sup>&</sup>lt;sup>15</sup> Rule K.30 of the Procedures for Complex Chapter 11 Cases in the Southern District of Texas provides that "if a motion is filed that complies with these procedures to extend the time to take any action before the expiration of the period prescribed by the Bankruptcy Code, the Bankruptcy Rules, the Local Bankruptcy Rules, or a confirmed plan, the time for taking the action is automatically extended until the Court rules on the motion. An automatic extension under this rule does not require the issuance or entry of an order extending the time." By filing this Motion prior to the expiration of the deadline to file notices of removal under Bankruptcy Rule 9027(a), such deadline is automatically extended until the Court resolves the Motion.

governmental unit's police or regulatory power, to the district court for the district where such civil action is pending, if such district court has jurisdiction of such claim or cause of action under section 1334 of this title.<sup>16</sup>

18. Bankruptcy Rule 9027(a)(2) further provides in pertinent part that:

If the claim or cause of action in a civil action is pending when a case under the Code is commenced, a notice of removal may be filed only within the longest of (A) 90 days after the order for relief in the case under the Code, (B) 30 days after entry of an order terminating a stay, if the claim or cause of action in a civil action has been stayed under § 362 of the Code, or (C) 30 days after a trustee qualifies in a chapter 11 reorganization case but not later than 180 days after the order for relief.<sup>17</sup>

19. With respect to post-petition actions, Bankruptcy Rule 9027(a)(3) provides

that a notice of removal may be filed:

only within the shorter of (A) 30 days after receipt, through service or otherwise, of a copy of the initial pleading setting forth the claim or cause of action sought to be removed, or (B) 30 days after receipt of the summons if the initial pleading has been filed with the court but not served with the summons.<sup>18</sup>

20. Bankruptcy Rule 9006(b)(1) provides that the Court may extend unexpired

time periods, such as the removal period, without notice:

[W]hen an act is required or allowed to be done at or within a specified period by these rules or by a notice given thereunder or by order of court, the court for cause shown may at any time in its discretion . . . with or without motion or notice order the period enlarged if the request therefor is made before the expiration of the period originally prescribed or as extended by a previous order . . .<sup>19</sup>

<sup>&</sup>lt;sup>16</sup> 28 U.S.C. § 1452(a).

<sup>&</sup>lt;sup>17</sup> Fed. R. Bankr. P. 9027(a)(2).

<sup>&</sup>lt;sup>18</sup> Bankruptcy Rule 9027(a)(3).

<sup>&</sup>lt;sup>19</sup> Fed. R. Bankr. P. 9006(b)(1).

#### **RELIEF REQUESTED SHOULD BE GRANTED**

21. It is well-settled that this Court is authorized to extend, for cause, the removal period provided under 28 U.S.C. § 1452 and Bankruptcy Rule 9027.<sup>20</sup> The further extension of the Bankruptcy Rule 9027(a) deadline until January 18, 2023 will afford the GUC Trust additional time (i) to work through unresolved claims that relate to Prepetition Actions without unnecessary litigation, to the extent possible; and (ii) to investigate and make informed decisions regarding the Prepetition Actions including, but not limited to, whether removal is appropriate under the circumstances.

22. To date, given the ongoing process set forth in the ADR Procedures, the GUC Trust has not conclusively determined which, if any, of the Prepetition Actions it may seek to remove. Moreover, the GUC Trust is still actively reviewing claims that are not subject to the ADR Procedures, and anticipates filing additional claim objections. Therefore, the GUC Trust believes that it is prudent to seek an extension of the time prescribed under Bankruptcy Rule 9027(a), extending the Removal Deadline from the current deadline of September 20, 2022 to January 18, 2023 to protect the right to remove the Prepetition Actions if the GUC Trust deems it appropriate.

23. The extension sought will afford the GUC Trust a reasonable additional amount of time to make informed decisions concerning whether to seek to remove any pending Prepetition Action and will assure that the GUC Trust does not forfeit valuable rights under

See, e.g., In re EP Energy Corp., Case No. 19-35654 (MI) (Bankr. S.D. Tex. Feb. 10, 2020) (Docket No. 801) (granting 120-day initial extension of the removal period without prejudice to debtors' ability to seek additional extensions); In re Vanguard Nat. Res., Inc., No. 19-31786 (DRJ) (Bankr. S.D. Tex. July 2, 2019) (Docket No. 529) (same); In re Westmoreland Coal Co., No. 18-35672 (DRJ) (Bankr. S.D. Tex. Dec. 18, 2018) (Docket No. 818) (same); In re iHeartMedia, Inc. No. 18-31274 (MI) (Bankr. S.D. Tex. May 30, 2018) (Docket No. 862) (same); In re Cobalt Int'l Energy, Inc., No. 17-36709 (MI) (Bankr. S.D. Tex. Feb. 22, 2017) (Docket No. 470) (same); In re Seadrill Ltd., No. 17-60079 (DRJ) (Bankr. S.D. Tex. Nov. 27, 2017) (Docket No. 717) (same).

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28 U.S.C. § 1452. Absent the requested extension, the GUC Trust will not be able to continue this review adequately and the result could, among other things, unnecessarily hinder the GUC Trust's duties and responsibilities, including ultimately making distributions to General Unsecured Creditors. Further, the rights of the adversaries in the Prepetition Actions will not be prejudiced by such an extension because any party to an action that is removed may seek to have the action remanded to the state court pursuant to 28 U.S.C. § 1452(b).

24. The GUC Trust further requests that the order approving this Motion be without prejudice to the right of the GUC Trust to seek further extensions of the Removal Deadline.

25. For the reasons stated above, the GUC Trust submits that cause exists to grant this Motion, and that the relief requested herein is appropriate and in the best interests of the GUC Trust, its beneficiaries, and the Debtors' estates, their creditors and all parties in interest.

## NOTICE

26. Notice of this Motion shall be provided to: (i) the Office of the United States Trustee; (ii) known parties to Prepetition Actions or their counsel; and (iii) all parties requesting notice under Bankruptcy Rule 2002. In light of the procedural nature of the post-confirmation relief requested herein, the GUC Trust submits that such notice is sufficient under the circumstances and that no other or further notice is required.

WHEREFORE the GUC Trust respectfully requests entry of the Proposed Order granting the relief requested herein and such other and further relief as the Court may deem just and appropriate.

Dated: September 19, 2022 New York, New York

#### /s/ Jason R. Adams

KELLEY DRYE & WARREN, LLP Eric R. Wilson (admitted *pro hac vice*) Jason R. Adams (admitted *pro hac vice*) 3 World Trade Center 175 Greenwich Street New York, NY 10007 Tel: (212) 808-7800 Fax: (212) 808-7897 Email: ewilson@kelleydrye.com jadams@kelleydrye.com

Counsel to the NPC International GUC Trust Case 20-33353 Document 2231 Filed in TXSB on 09/19/22 Page 11 of 16

# EXHIBIT A

**Proposed Order** 

### IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:

NPC INTERNATIONAL, INC.<sup>1</sup>

Chapter 11

Case No. 20-33353 (DRJ)

Debtor.

# ORDER (I) FURTHER EXTENDING THE DEADLINE BY WHICH THE NPC INTERNATIONAL GUC TRUST MAY <u>REMOVE CIVIL ACTIONS; AND (II) GRANTING RELATED RELIEF</u>

Upon the motion (the "Motion") of the NPC International GUC Trust (the "GUC 2 Trust"), for an order extending the Removal Deadline, pursuant to 28 U.S.C. § 1452 and Bankruptcy Rules 9006(b) and 9027, and Local Rule 9013-1, as more fully set forth in the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. § 1334; and consideration of the Motion and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and it appearing that venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided, and it appearing that no other or further notice need be provided; and this Court having reviewed the Motion; and upon the record herein and upon all of the proceedings had before the Court; and all objections, if any, to the Motion having been withdrawn, resolved, or overruled; and the Court having determined that the legal and factual bases set forth in the

<sup>&</sup>lt;sup>1</sup> The Debtors in these chapter 11 cases, are NPC International, Inc. ("<u>NPCI</u>"); NPC Restaurant Holdings I LLC; NPC Restaurant Holdings, Inc.; NPC International Holdings, LLC; NPC Restaurant Holdings, LLC; NPC Operating Company B, Inc.; and NPC Quality Burgers, Inc. On June 25, 2021, the Court entered a final decree closing each of the chapter 11 cases other than NPCI's chapter 11 case [Docket No. 1785]. Commencing on June 25, 2021, all motions, notices and other pleadings relating to any of the Debtors shall be filed in NPCI's chapter 11 case.

<sup>&</sup>lt;sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

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Motion establish just cause for the relief granted herein; and it appearing that the relief requested in the Motion is in the best interests of the GUC Trust, its beneficiaries, and the Debtors and their respective estates, creditors, and all parties in interest; and after due deliberation and sufficient cause appearing therefor,

#### **IT IS HEREBY ORDERED THAT:**

1. The Motion is granted to the extent set forth herein.

The Removal Deadline is extended from the current deadline of September
 20, 2022 through and including January 18, 2023.

3. This Order shall be without prejudice to the GUC Trust's right to seek a further extension of the Removal Deadline.

4. The GUC Trust is authorized to take all action necessary to effectuate the relief granted in this Order.

5. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

6. Notwithstanding entry of this Order, nothing herein shall create, nor is intended to create, any rights in favor of, or enhance the status of any claim held by, any party.

Dated: \_\_\_\_\_, 2022 Houston, Texas

# THE HONORABLE DAVID R. JONES UNITED STATES BANKRUPTCY JUDGE

# **CERTIFICATE OF SERVICE**

I certify that on September 19, 2022, I caused a true and correct copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on those parties registered to receive electronic notices.

In addition, on September 19, 2022, service was made upon those listed on the attached schedule via U.S. First Class Mail or via email as indicated.

<u>/s/ Maria Vicinanza</u> Maria Vicinanza

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#### Service list as of September 19, 2022

Service list as of September 19, 2	1022	ADDRESS2	ADDRESS3	ADDRESS4	CITY	STATE	710	FMAIL
	ADDRESS1 (COUNSEL TO KOVNICK JAX LLC & TINSELTOWN PALZA			ADDRESS4				
AKERMAN LLP	LLC & JACOB ROE, Tiffany Smith)	ATTN JACOB A BROWN ATTN JONATHAN T EDWARDS, DENNIS J CONNOLLY	50 N LAURA ST, STE 3100		JACKSONVILLE		32202	JACOB.BROWN@AKERMAN.COM jonathan.edwards@alston.com; dennis.connolly@alston.com;
ALSTON & BIRD LLP	(COUNSEL TO MCLANE FOODSERVICE INC) (COUNSEL TO SELIG ENTERPRISE INC, PIZZA HUT	DAVID A WENDER & JACOB JOHNSON	ONE ATLANTIC CENTER; 1201 E PEACHTREE ST		ATLANTA	GA	30309	david.wender@alston.com; jacob.johnson@alston.com
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BINGMAN HESS COBLENTZ & BELL PC BOXER PROPERTY MANAGEMENT CORPORATION	(COUNSEL TO RIVERCREST REALTY ASSOCIATES LLC) (COUNSEL TO MUHLENBERG TOWNSHIP AUTHORITY) (COUNSEL TO 14201 EAST FOURTH LLC)	ATTN SCOTT L FLEISCHER, ESQ ATTN THOMAS A ROTHERMEL, ESQ ATTN JOHN COSELLI	JESSICA M SIMON BARCLAY DAMON TOWER, 125 E JEFFERSON ST 1270 AVE OF THE AMERICAS, STE 501 TREEVIEW CORPORATE CENTER, STE 100 720 N POST OAK RD, STE 500	2 MERIDIAN BLVD	WYOMISSING HOUSTON	PA TX	19610 77024	tarothermel@bingamanhess.com JOHN.COSELLI@BOXERPROPERTY.COM
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COLE SCHOTZ PC COMMONWEALTH OF PENNSYLVANIA DEPT OF LABOR	(COUNSEL TO 2033 CHAMBERSBURG LLC) INDUSTRY COLLECTIONS SUPPORT UNIT	ATTN MICHAEL D WARNER, ESQ ATTN DEB SECREST	301 COMMERCE ST, STE 1700		FORT WORTH HARRISBURG	ТХ	76102	mwarner@coleschotz.com
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DLA PIPER LLP (US)	(COUNSEL TO CR PELICAN PRESERVE LLC, CR MANGO LLC, CR MONTEVALLO LLC & CR HEGERSTOWN LLC)	ATTN ANDREW B ZOLLINGER	1900 N PEARL ST, STE 2200		DALLAS	TV	75201	andrew.zollinger@dlapiper.com
	(COUNSEL TO CR PELICAN PRESERVE LLC, CR MANGO	ATTWANDREW B ZOLLINGER	1900 N PEAKE 31, 312 2200		DALLAS	1.0	70201	andrew.zoningersgolapper.com
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LINEBARGER GOGGAN BLAIR & SAMPSON LLP LOCH-WINN FARMS LLP LONGLEAF LAW PARTNERS	AND RVING ISD) (COUNSEL TO COUNTES OF JASPER, ORANGE, HARRIS ATTH H PARCE SCOTT, GENERAL PARTNER (COUNSEL TO COLLERVILLE SHOPS LLC)	JEFFERSON, SILSBEE ISD) 2912-B N OAK ST PIZZA HUT STORE # 4120]) ATTN MCHAEL E COLUNE	ATTN TARA L GRUNDEMEIER ATTN CINVO GOLIVER		HOUSTON VALDOSTA RALEIGH	GA	31602	houston, bankruptov@publicans.com peerce@fleearcescotpc.com collive@fleengelabl.com mocilins@maneherod.com TPEENEY@MCFELAW.COM Ieday@mobiaks.com crgbbs@msc.com, eseite@mwe.com, jagerber@mwe.com
LINEBARGER GOGGAN BLAR & SAMPSON LLP LOCH-WINN FARMS LLP LOCH-WINN FARMS LLP MAREER AL LAND RTINERS LANDERER AL LAND RTINERS MICCHARTY VIELLAS BLEEN Y DC MICCHARTY VIELLAS BLEEN Y LD MICCHARTY WILL & BLEEY LLP MICCHARTY WILL & BLEEY LLP MICCHARTY WILL & BLEEY LLP	AND RIVING EDU. ICOUNSEL TO COUNTES OF JASPER, ORANGE, HARRE ATTH H FEARCE SCOTT, GENERAL PARTNER ICOUNSEL TO ACH NSURANCE COMPANY ICOUNSEL TO AFFL NSURANCE COMPANY ICOUNSEL TO HARD COUNTY A JASPER COUNTY, TE ICOUNSEL TO PAZZA HUT LLC) ICOUNSEL TO PAZZA HUT LLC) ICOUNSEL TO PAZZA HUT LLC)	LEFFERSON, SLISBEE SD) 2012a N OAK 2013 PZZA HUT STORE # 4 (20) ATTM MCHAELE COLLINS ATTM MCHAELE COLLINS ATTM ATTM AND FOR ATTM ANTHAN FORD ATTM NATHAN F CORD ATTM NATHAN F CORD ATTM NATHAN F CORD	ATTN TARA L GRUNDEMEIER ATTN CNDY G GANER 2010 DEMONBERUN ST. STE 900 328 16TH ST. STE 100 PD BOX 1280 2001 FL MARWOOD ST. STE 1900 2001 FL MARWOOD ST. STE 1900 2001 FL MARWOOD ST. STE 800 BOT KERNL KYOPTI XVE. STE 800		HOUSTON VALDOSTA RALEIGH NASHVILLE ROCK ISLAND ROUND ROCK DALLAS HOUSTON BAGEBDALE	GA NC TN IL TX TX TX MD	31602	houston: barkingdor/@publicans.com prearce@Tiprearcescutipc.com collins @imarichmoci.com modins @imarichmoci.com modins @imarichmoci.com detarly@imahaine.com crigbios @imee.com.cealel@mee.com.jagether@mee.com nocod@mee.com
LINEBARGER GOGGAN BLAR & SAMPSON LLP LOCH-WINN FARMS LLP LOCH-WINN FARMS LLP MAREER AL LAND RTINERS LANDERER AL LAND RTINERS MICCHARTY VIELLAS BLEEN Y DC MICCHARTY VIELLAS BLEEN Y LD MICCHARTY WILL & BLEEN Y LD MICHARTY WILL Y LD MICHARTY WILL & BLEEN Y LD MICHAR	AND REVISE SD COUNSEL TO COUNTES OF JASPER_CRANCE, HARRE ATTIN HI PEARCE SCOTT, CENERAL PARTNER COUNSEL TO HARD TECHNICAL PARTNER (COUNSEL TO ARCH INSURANCE COMPANY) (COUNSEL TO THE LORDGE LLC) (COUNSEL TO THE LORDGE LLC) (COUNSEL TO THE LORDGE LLC) (COUNSEL TO THE LORDGE LLC) (COUNSEL TO THE STORAGE IN A MARYLAND) (COUNSEL TO THE STORAGE IN A MARYLAND) (COUNSEL TO THE STORAGE IN A MARYLAND)	LEFFERSON, SLISBEE SD) 2012 BN OAK ST PZZA NUT STORE 4 1400 PZZA NUT STORE 4 1400 ATTN TAPAL IEDAY ATTN TAPA LEDAY ATTN CHARLES R GBBS, ERC SEITZ 4 JANE A GERBER ATTN NATHAR F COED ATTN ATTN ATTN F COED ATTN ATTN ATTN ATTN ATTN ATTN ATTN ATTN	ATTN TARA L GRUADEMEIER ATTN CAUY G GLUER 2010 ENKUNBER ST, STE 900 2020 EIKINBER ST, STE 100 PO BOX 1289 2001 H ARRVOCO ST, STE 1900 2001 MLAN ST, STE 100 DI MLAN ST, STE 100 254 HUSSON VARIS 254 HUSSON VARIS 254 HUSSON VARIS		HOUSTON VALDOSTA RALEIGH NASHVILLE ROCK ISLAND ROUND ROCK DALLAS HOUSTON RIVERDALE NEW YORK LEXINGTON	GA NC TN IL TX TX TX TX MD NY KY	31602 27612 37203 61201 72680 72501-1844 77002 20737-1385 10001 40507	houston, barkingskylligudicans.com pearce-Breakmanner.com diverse Blangelads.com diverse Blangelads.com TFEENY PMCFE-LAW.COM effekty@mtblaus.com crigblat@mtblaus.com combat@mtes.com; sealt@mtes.com pagebat@mtes.com combat@mtes.com combat@mtes.com combat@mtes.com MERCODRMLBANK.COM
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STARK & STARK PC	COUNSEL TO HP WAUGHTOWN LLC & DP WAUGHTOW		PO BOX 5315	1	PRINCETON		08543	ilamkin@stark.stark.com
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