

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

In re:

SAM ASH MUSIC CORPORATION, *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 24-14727 (SLM)

(Jointly Administered)

**Ref. Docket Nos. 600 - 601**

**CERTIFICATE OF SERVICE**

I, SHARNA WILSON, hereby certify that:

1. I am employed as a Case Manager by Epiq Corporate Restructuring, LLC, with their principal office located at 777 Third Avenue, New York, New York 10017. I am over the age of eighteen years and am not a party to the above-captioned action.
2. On January 31, 2025, I caused to be served the:
  - a. "Motion in Support of Liquidating Trustee's First Omnibus Objection to Claims Seeking to Modify or Disallow and Expunge Certain (I) Duplicate Claims; (II) Amended and Superseded Claims; (III) Satisfied Claims; (IV) Inadequately Supported Claims; (V) Claims Filed in the Wrong Case; (VI) Claims That Improperly Assert Priority; (VII) Reduced and Allowed Claims and (VIII) No Liability Claims," dated January 31, 2025 [Docket No. 600], (the "1<sup>st</sup> Omnibus Objection"), and
  - b. *customized* "Notice of Objection to Your Claim," dated January 31, 2025, *related to Docket No. 601*, a sample of which is annexed hereto as Exhibit A, (the "Custom Notice"),

by causing true and correct copies of the:

- i. 1<sup>st</sup> Omnibus Objection to be enclosed securely in separate postage pre-paid envelopes and delivered via first class mail to those parties listed on the annexed Exhibit B,

---

<sup>1</sup> The debtors in these chapter 11 cases, along with the last four digits of each debtor's federal tax identification number, are: Sam Ash Music Corporation (3915); Samson Technologies Corp. (4062); Sam Ash Megastores, LLC (9955); Sam Ash California Megastores, LLC (3598); Sam Ash Florida Megastores, LLC (7276); Sam Ash Illinois Megastores, LLC (8966); Sam Ash Nevada Megastores, LLC (6399); Sam Ash New York Megastores, LLC (7753); Sam Ash New Jersey Megastores, LLC (8788); Sam Ash CT, LLC (5932); Sam Ash Music Marketing, LLC (2024); and Sam Ash Quikship Corp. (7410). The location of debtor Sam Ash Music Corporation's principal place of business was 278 Duffy Avenue, P.O. Box 9047, Hicksville, NY 11802.

- ii. 1<sup>st</sup> Omnibus Objection and Custom Notice to be enclosed securely in separate postage pre-paid envelopes and delivered via first class mail to those parties listed on the annexed Exhibit C, and
  - iii. 1<sup>st</sup> Omnibus Objection to be delivered via electronic mail to those parties listed on the annexed Exhibit D.
3. All envelopes utilized in the service of the foregoing contained the following legend:  
“LEGAL DOCUMENTS ENCLOSED. PLEASE DIRECT TO THE ATTENTION OF ADDRESSEE, PRESIDENT OR LEGAL DEPARTMENT.”

/s/ Sharna Wilson  
Sharna Wilson

## **EXHIBIT A**

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
**Caption in Compliance with D.N.J. LBR 9004-1**

**PORZIO, BROMBERG & NEWMAN, P.C.**

100 Southgate Parkway

P.O. Box 1997

Morristown, NJ 07962

Telephone: (973) 538-4006

Brett S. Moore, Esq. (bsmoore@pbnlaw.com)

Kelly D Curtin, Esq. (kdcurtin@pbnlaw.com)

Rachel A. Parisi, Esq. (raparisi@pbnlaw.com)

*Counsel to Emerald Capital Advisors in its capacity  
as Liquidating Trustee*

In re:

SAM ASH MUSIC CORPORATION, *et al.*

Debtors.<sup>1</sup>

Chapter 11

Case No. 24-14727 (SLM)

(Jointly Administered)

**Hearing Date: March 4, 2025 at 11:00 a.m.**

**Objection Deadline: February 25, 2025 at 4:00 p.m.**

**NOTICE OF OBJECTION TO YOUR CLAIM**

**To: Vantree Systems**

Emerald Capital Advisors in its capacity as the Trustee for the Liquidating Trust (the "Liquidating Trustee"), by and through its undersigned counsel, has filed the enclosed *Liquidating Trustee's First Omnibus Objection To Claims Seeking To Modify Or Disallow And Expunge Certain (I) Duplicate Claims; (II) Amended And Superseded Claims; (III) Satisfied Claims; (IV) Inadequately Supported Claims; (V) Claims Filed In The Wrong Case; (VI) Claims That Improperly Assert Priority; (VII) Reduced And Allowed Claims And (VIII) No Liability Claims* (the "Motion") (Docket No. 600), which seeks to alter your rights by modifying your claim on the basis set forth in the Motion at pages 10 through 12 and as set forth in the Proposed Order at Schedule F.

<sup>1</sup> The debtors in these chapter 11 cases, along with the last four digits of each debtor's federal tax identification number, are: Sam Ash Music Corporation (3915); Samson Technologies Corp. (4062); Sam Ash Megastores, LLC (9955); Sam Ash California Megastores, LLC (3598); Sam Ash Florida Megastores, LLC (7276); Sam Ash Illinois Megastores, LLC (8966); Sam Ash Nevada Megastores, LLC (6399); Sam Ash New York Megastores, LLC (7753); Sam Ash New Jersey Megastores, LLC (8788); Sam Ash CT, LLC (5932); Sam Ash Music Marketing, LLC (2024); and Sam Ash Quikship Corp. (7410). The location of debtor Sam Ash Music Corporation's principal place of business was 278 Duffy Avenue, P.O. Box 9047, Hicksville, NY 11802.

If you disagree with this Motion, you must file a response to the Motion with the Clerk of the Bankruptcy Court at the address below on or before **4:00 p.m. (EST) on February 25, 2025**:

Martin Luther King, Jr. Federal Building  
50 Walnut Street  
Newark, NJ 07102

At the same time, you must also serve a copy of the response upon the Liquidating Trustee's attorneys:

Brett S. Moore, Esq., Kelly D. Curtin, Esq., Rachel A. Parisi, Esq.  
100 Southgate Parkway  
Morristown, New Jersey 07962  
(973) 538-4006  
(973) 538-5146 Facsimile  
Email: ([bsmoore@pbnlaw.com](mailto:bsmoore@pbnlaw.com))  
([kdcurtin@pbnlaw.com](mailto:kdcurtin@pbnlaw.com))  
([raparisi@pbnlaw.com](mailto:raparisi@pbnlaw.com))

If you file a response, you and your attorney must appear at a hearing on the Motion that will be held before the Honorable Stacey L. Meisel on **March 4, 2025 at 11:00 a.m. (EST)** at the United States Bankruptcy Court for the District of New Jersey, 50 Walnut Street, Courtroom 3A, Newark, NJ 07102.

**IF YOU DO NOT RESPOND TO THE MOTION, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.**

Dated: January 31, 2025

**PORZIO, BROMBERG & NEWMAN, P.C.**

By: /s/ Brett S. Moore  
Brett S. Moore, Esq.  
Kelly D Curtin, Esq.  
Rachel A. Parisi, Esq.  
100 Southgate Parkway  
Morristown, NJ 07962-1997  
(973) 538-4006  
[bsmoore@pbnlaw.com](mailto:bsmoore@pbnlaw.com)  
[kdcurtin@pbnlaw.com](mailto:kdcurtin@pbnlaw.com)  
[raparisi@pbnlaw.com](mailto:raparisi@pbnlaw.com)

*Counsel to the Liquidating Trustee of the  
Liquidating Trust of Sam Ash Music  
Corporation and its Subsidiary Debtors*

## **EXHIBIT B**

SAM ASH MUSIC CORPORATION, *et al.*, Case No. 24-14727 (SLM)  
First Class Mail Post-Effective Master Service List

OFFICE OF THE UNITED STATES TRUSTEE  
ATTN: FRAN B. STEELE, ESQ.  
ONE NEWARK CENTER, SUITE 2100  
NEWARK, NJ 07102

OFFICE OF THE UNITED STATES TRUSTEE  
ATTN: PETER J. D'AURIA, ESQ.  
ONE NEWARK CENTER, SUITE 2100  
NEWARK, NJ 07102

## **EXHIBIT C**



Claim Name	Address Information
A DIAMOND DELIVERY SERVICE	10125 NW 71ST ST TAMARAC FL 33321
ACT LIGHTING INC	ATTN LISA COOK 3581 LARCH LN JACKSON MO 63755
AP GROWTH PROPERTIES LP	ATTN JESSICA PRETIGER 6500 MONTANA AVE, STE A EL PASO TX 79925
AP GROWTH PROPERTIES LP	ATTN JESSICA PRETIGER 6500 MONTANA AVE, STE A EL PASO TX 79925
AP GROWTH PROPERTIES LP	ATTN JESSICA PRETIGER 6500 MONTANA AVE, STE A EL PASO TX 79925
AP GROWTH PROPERTIES LP	C/O SCOTTHULSE PC ATTN ROBERT R FEUILLE 201 E MAIN DR, STE 1100 EL PASO TX 79901
AP GROWTH PROPERTIES LP	C/O SCOTTHULSE PC ATTN ROBERT R FEUILLE 201 E MAIN DR, STE 1100 EL PASO TX 79901
AP GROWTH PROPERTIES LP	C/O SCOTTHULSE PC ATTN ROBERT R FEUILLE 201 E MAIN ST, STE 1100 EL PASO TX 79901
AP GROWTH PROPERTIES LP	C/O SCOTTHULSE PC ATTN ROBERT R FEUILLE PO BOX 99123 EL PASO TX 79999-9123
BEST BOXES PACKING SHIPPING	4255 DEAN MARTIN DR, STE H LAS VEGAS NV 89103
BOSCH SECURITY SYSTEMS LLC	ATTN STEVE GRAPENTHIE, GS/OBC11-NA 1800 W CENTRAL RD MOUNT PROSPECT IL 60056
BPREP 333 W 34TH LLC	C/O GREENBERG TRAUIG LLP ATTN KENNETH A PHILBIN ONE VANDERBILT AVE NEW YORK NY 10017
BPREP 333 W 34TH LLC	C/O GREENBERG TRAUIG LLP ATTN KENNETH A PHILBIN ONE VANDERBILT AVE NEW YORK NY 10017
BROAD STREET FF LLC	C/O BRITTANY B FALABELLA PO BOX 500 RICHMOND VA 23218
BROAD STREET FF LLC	C/O BRITTANY FALABELLA 2100 E CARY ST RICHMOND VA 23223
CHEMISTRY DESIGN WERKS	801-803 TRANSFER RD, UNIT E13 SAINT PAUL MN 55114
DREW & ROGERS INC	30 PLYMOUTH ST FAIRFIELD NJ 07004
E-DISTRIBUTORS INC	ATTN SHMUEL FREUND 600 BAYVIEW AVE, STE 200 INWOOD NY 11096
E-DISTRIBUTORS INC	C/O MCELROY DEUTSCH LLP ATTN JEFFREY BERNSTEIN, ESQ 570 BROAD ST, STE 1401 NEWARK NJ 07102
FERREE'S TOOLS INC	1477 E MICHIGAN AVE BATTLE CREEK MI 49014
FRANKLIN MILLS ASSOCIATES LP	C/O SIMON PROPERTY GROUP INC 225 W WASHINGTON ST INDIANAPOLIS IN 46204
GOANG-FANN CO LTD	3F, NO 7, ALY 2, LANE 342 FUDE 1ST RD, XIZHI DIST, NEW TAIPEI CITY 22150 TAIWAN
GREENS OF LYNTHURST LTD	C/O MICHAEL R STAVNICKI 3333 RICHMOND RD, STE 370 BEACHWOOD OH 44122
HOMNI ENTERPRISES CO LTD	ATTN ALAN LIN 3F, NO 162, SEC 2, ZHONGSHAN N RD ZHONGSHAN DIST TAIPEI TW 10452 TAIWAN
HOMNI ENTERPRISES CO LTD	NO 68 HUANGHE RD, FENGHUANG GANG, TANGXIA TOWN DONGGUAN GD 523717 CHINA
HOSHINO (USA) INC	ATTN JILL COHEN, GC AND VP OF ADMIN 1726 WINCHESTER RD BENSALEM PA 10036
HOSHINO (USA) INC	ATTN JILL COHEN, GC AND VP OF ADMIN 1726 WINCHESTER RD BENSALEM PA 19020
HOSHINO (USA) INC	C/O CHRISTOPHER F GRAHAM, ESQ C/O ANDREW E ARTHUR, ESQ 810 SEVENTH AVE, STE 500 NEW YORK NY 10019
HOSHINO (USA) INC	C/O CHRISTOPHER F GRAHAM, ESQ C/O ANDREW E ARTHUR, ESQ 810 SEVENTH AVE, STE 500 NEW YORK NY 10019
JOHNSON CONTROLS FIRE PROTECTION LP	5757 N GREEN BAY AVE GLENDALE WI 53209
KAREN MM LLC/LAURICH PROPERTIES INC	10655 PARK RUN DR, STE 160 LAS VEGAS NV 89144-4590
KAREN MM LLC/LAURICH PROPERTIES INC	C/O JOHN M NETZORG 2810 W CHARLESTON BLVD, STE F62 LAS VEGAS NV 89102
MAGNOLIA PALMS DAPHNE LLC ET AL	ATTN STEPHEN FALANGA 100 MULBERRY ST, 15TH FL NEWARK NJ 07102
MAGNOLIA PALMS DAPHNE LLC ET AL	ATTN TREY WALLACE 5370 OAKDALE RD SMYRNA GA 30082
NORTH FREEWAY PARTNERS LLC	5373 W ALABAMA ST, STE 404 HOUSTON TX 77056
NORTH FREEWAY PARTNERS LLC	C/O THE HEINRICH LAW FIRM PLLC ATTN TIMOTHY JOHN HEINRICH SR, ATTY 5858 WESTHEIMER RD, STE 845 HOUSTON TX 77057
ONTARIO MILLS LP	C/O SIMON PROPERTY GROUP INC 225 W WASHINGTON ST INDIANAPOLIS IN 46204
ONTARIO MILLS LP	C/O SIMON PROPERTY GROUP INC 225 W WASHINGTON ST INDIANAPOLIS IN 46204
RELACART ELECTRONICS CO LTD	NO 10 FUXING ROAD, PINGSHI INDUSTRIAL DISTRICT, ENPING CITY, GD 529400 CHINA
RELACART ELECTRONICS CO LTD	NO 10 FUXING ROAD, PINGSHI INDUSTRIAL DISTRICT, ENPING CITY, GD 529400 CHINA

Claim Name	Address Information
SHIFT 4 PAYMENTS	3501 CORPORATE PKWY CENTER VALLEY PA 18034
STAY AHEAD LIMITED	5/F SPA CENTRE 53-55 LOCKHART WAHCHAI WAHCHAI HONG KONG 02345 CHINA
THERMAL RELIEF DESIGN	3395 W CHEYENNE AVE, STE 105 NORTH LAS VEGAS NV 89032
UE 2100 ROUTE 38 LLC	C/O BALLARD SPAHR LLP ATTN LESLIE HEILMAN 919 N MARKET ST, 11TH FL WILMINGTON DE 19801
VANTREE SYSTEMS INC	6500 TRANSCANADA HWY CHEMIN DE SERVICE S, 4TH FL, OFC #414 POINTE-CLAIRE QC H9R 0A5 CANADA
YAMAHA GUITAR GROUP INC	ATTN MIKE BAYER, GENERAL COUNSEL 26580 AGOURA RD CALABASAS CA 91302
YAMAHA GUITAR GROUP INC	C/O BAKER BOTTS LLP ATTN TRAVIS A MCROBERTS 2001 ROSS AVE, STE 900 DALLAS TX 75201

Total Creditor count: 47

## **EXHIBIT D**

Name	Attention	Email Address
OFFICE OF THE US TRUSTEE; US DEPT OF JUSTICE	ATTN: FRAN B. STEELE, ESQ. AND PETER J. D'AURIA, ESQ.	fran.b.steele@usdoj.gov; peter.j.d'auria@usdoj.gov; USTPRegion03.NE.ECF@usdoj.gov
PASHMAN STEIN WALDER HAYDEN, P.C		jweiss@pashmanstein.com
SQUIRE PATTON BOGGS (US) LLP		mark.errico@squirepb.com; mark.salzberg@squirepb.com