

## **Debtors' Twenty-Ninth, Thirtieth and Thirty-First Omnibus Objections to Certain Tier I Proofs of Claim (the "Claims Objections").**

By the Claims Objections, the Debtors seek entry of orders disallowing and expunging or modifying certain claims which were either (i) filed against the wrong Debtor entity, (ii) amended and superseded, (iii) duplicative, (iv) late-filed, (v) inconsistent with the Debtors' books and records, or (vi) lacking sufficient information (collectively, the "Disputed Claims").

By order dated August 21, 2009, the Court established October 30, 2009 (the "Bar Date") as the deadline to assert a claim against any of the Debtors. On January 20, 2010, the Court entered an order approving the Debtors' Motion for Entry of an Order Establishing Procedures for Objections to Claims (the "Claims Objection Procedures Order"). Pursuant to the Claims Objection Procedures Order, the Debtors may file omnibus objections to claims.

### **Claims that are Inconsistent with the Debtors' Books and Records**

By the Claims Objections, the Debtors object to certain of the Disputed Claims that assert claims that are inconsistent with the Debtors' books and records and are not otherwise supported by documentation. The Debtors request that such claims be reduced or adjusted to reflect the amounts listed on the Debtors' books and records.

### **Claims Containing Insufficient Information**

By the Claims Objections, the Debtors object to the allowance of certain of the Disputed Claims for failure to provide sufficient information to support a finding that the Debtors are liable to the claimant. Accordingly, the Debtors request that the Court disallow and expunge such claims from the Debtors' claims register.

### **Wrong Debtor Claims**

By the Claims Objections, the Debtors object to certain Disputed Claims that were asserted against the wrong Debtor for liabilities that are obligations of a different Debtor (the "Wrong Debtor Claims"). The Debtors request relief to reclassify the Wrong Debtor Claims against the proper Debtor and where applicable reduce the amount of such claims to reflect amounts consistent with the Debtors' books and records.

### **Duplicative Claims**

By the Claims Objections, the Debtors seek to expunge certain claims that are duplicative of other proofs of claim previously filed in the Debtors' chapter 11 cases. The Debtors reserve their rights, as well as the rights of any other parties in interest, to object to the surviving claims in the future. The Debtors request that such claims be expunged from the Debtors' claims register to ensure that the claimants do not receive a double recovery.

### **Late-Filed Claims**

By the Claims Objections, the Debtors object to certain claims filed after the Bar Date. The Debtors request that such claims be expunged from the Debtors' claims register.

**Amended and Superseded Claims**

By the Claims Objections, the Debtors object to the allowance of certain of the Disputed Claims (the "Amended and Superseded Claims") which, according to the Debtors, have been amended and superseded by a corresponding surviving claim filed in the Debtors' chapter 11 cases. The Debtors contend that the Amended and Superseded Claims should be disallowed to prevent multiple recoveries on a single claim.

*A hearing on the Claims Objections has been scheduled for July 13, 2010 at 9:45 a.m. with a corresponding objection deadline of July 6, 2010 at 4:00 p.m.*