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Counsel to the Plan Administrator

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X		
	:	
In re	:	Chapter 11
	:	
RUNWAY LIQUIDATION HOLDINGS, LLC, et al.,¹	:	Case No. 17-10466 (SCC)
	:	
Debtors.	:	Jointly Administered
-----X		

**CERTIFICATION OF COUNSEL REGARDING THE PLAN
ADMINISTRATOR’S EIGHTH OMNIBUS (NON-SUBSTANTIVE)
OBJECTION TO CERTAIN DUPLICATE CLAIMS**

Pursuant to 28 U.S.C. § 1746 and Rule 9075-2 of the Local Rules of the United States Bankruptcy Court for the Southern District of New York (the “Local Rules”), and in accordance with the case management procedures set forth in the *Order Establishing Certain Notice, Case Management, and Administrative Procedures* [Docket No. 90] (the “Case Management Order”), the undersigned hereby certifies as follows:

1. On December 20, 2017, counsel to David MacGreevey, in his capacity as the Plan Administrator, filed the *Plan Administrator’s Eighth Omnibus (Non-Substantive) Objection to*

¹ A list of the Post-Effective Date Debtors in these chapter 11 cases, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number include: Runway Liquidation Holdings, LLC (6857); Runway Liquidation, LLC (5942); Runway Liquidation Intermediate Holdings, LLC (3673); MR Liquidation, LLC (9200); and MMH Liquidation, LLC (3854).

Certain Duplicate Claims [Docket No. 779] (the “Eighth Omnibus Objection”) with the United States Bankruptcy Court for the Southern District of New York (the “Court”).

2. The Case Management Order provides that where no objection to a request for relief is filed, the movant may submit a proposed order granting such request for relief to the Court along with a certificate of no objection stating that no objection has been filed or served on the movant.

3. The undersigned counsel hereby certifies that, as of the date hereof, no answer, objection, or other response to the Eighth Omnibus Objection has been received. Undersigned counsel further certifies that she has reviewed the docket in this case and no answer, objection, or other response to the Eighth Omnibus Objection appears thereon.

4. Accordingly, the undersigned respectfully requests that the Court enter the order attached hereto as Exhibit A in accordance with the procedures described in the Case Management Order.

Dated: February 16, 2018

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Maria A. Bove

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EXHIBIT A

Proposed Order

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**UNITED STATES BANKRUPTCY COURT
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In re	:	Chapter 11
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RUNWAY LIQUIDATION HOLDINGS, LLC, et al.,¹	:	Case No. 17-10466 (SCC)
	:	
Debtors.	:	Jointly Administered
	:	
-----X		

**ORDER GRANTING PLAN ADMINISTRATOR’S EIGHTH OMNIBUS
 (NON-SUBSTANTIVE) OBJECTION TO CERTAIN DUPLICATE CLAIMS**

Upon the objection (the “Objection”)² of the Plan Administrator for entry of an order (this “Order”) disallowing and expunging the claims identified on **Schedule 1** (collectively, the “Disputed Claims” or “Duplicate Claims”) pursuant to section 502(b) of the Bankruptcy Code, Bankruptcy Rule 3007, and the Objection Procedures, all as more fully set forth in the Objection; and upon the Boken Declaration; and the Court having found that it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the Southern District of New York*, dated December 1, 2016, and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2);

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² Capitalized term used but not otherwise defined herein shall have the meanings ascribed to them in the Objection.

and the Court having found that venue of this proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that the relief requested in the Objection is in the best interests of the Post-Effective Date Debtors, their creditors, and other parties in interest; and the Court having found that the Plan Administrator provided appropriate notice of the Objection and the hearing on the Objection under the circumstances; and the Court having reviewed the Objection; and the Court having determined that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Objection is sustained to the extent set forth herein.
2. The Duplicate Claims identified on **Schedule 1** attached hereto are disallowed and expunged in their entirety.
3. The Surviving Claims will remain on the Claims Register and such Claims are neither allowed nor disallowed at this time, subject, however, to any future objection on any basis.
4. Nothing contained herein shall constitute, nor shall it be deemed to constitute, the allowance of any of the Surviving Claims.
5. Donlin Recano, the Debtors' noticing and claims agent, is authorized to update the Claims Register to reflect the relief granted in this Order.
6. Entry of this Order is without prejudice to the Plan Administrator's right to object to any other Claims in these chapter 11 cases or to further object to the Disputed Claims (to the extent they are not disallowed and expunged pursuant to this Order) on any grounds whatsoever, at a later date.

7. Each Disputed Claim and the Objection by the Plan Administrator to each Disputed Claim as addressed in the Objection and as identified in **Schedule 1** attached hereto constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each Disputed Claim. Any stay of this Order shall apply only to the contested matter which involves such creditor and shall not act to stay the applicability or finality of this Order with respect to the other contested matters covered hereby.

8. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

9. The Plan Administrator is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Objection.

10. This Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: _____, 2018

THE HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE

Schedule 1 EIGHTH OMNIBUS OBJECTION

DUPLICATE CLAIMS

Name of Claimant	Debtor Name	Date Claim Filed	Claim Number	Asserted Claim Amount					Basis for Disallowance	Surviving Claim Number	Surviving Claim Amount				
				Secured	Admin	Priority	Unsecured	Total			Administrative	Secured	Priority	Unsecured	Total
DADA TRADING CO LTD RIGANO LLC NICHOLAS C RIGANO 538 BROADHOLLOW RD MELVILLE , NY 11747	BCBG MAX AZRIA GLOBAL HOLDINGS, LLC	8/29/2017	60002		\$406,897.58			\$406,897.58	Claim Is Duplicative of Administrativ e Portion of Surviving Claim	849	\$472,923.10			\$4,462,771.00	\$4,935,694.10
KEYSTONE FLORIDA PROPERTY HOLDING CORP JLL THE GALLERIA AT FT LAUDERDALE 2414 E SUNRISE BLVD FORT LAUDERDALE , FL 33304	BCBG MAX AZRIA GLOBAL HOLDINGS, LLC	8/30/2017	60007		\$106.00			\$106.00	Claim Is Duplicative of Administrativ e Portion of Surviving Claim	744	\$106.00			\$1,007,995.39	\$1,008,101.39
MARIA AMATO MERLYN SHOES SRLS VIA SOSSIO RUSSO 54 FRATTAMAGGIORE NAPLES , 80027	BCBG MAX AZRIA GROUP, LLC	7/4/2017	1016				\$3,455.31	\$3,455.31	Duplicative Claim of Surviving Claim	1015				\$3,455.31	\$3,455.31
STJTC II LLC SIMON PROPERTY GROUP RONALD M TUCKER 225 WEST WASHINGTON ST INDIANAPOLIS , IN 46204	BCBG MAX AZRIA GROUP, LLC	5/12/2017	438				\$291,176.46	\$291,176.46	Duplicative Claim of Surviving Claim	177				\$291,176.46	\$291,176.46