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Counsel to the Plan Administrator

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

CERTIFICATE OF SERVICE

STATE OF CALIFORNIA)
)
 CITY OF SAN FRANCISCO)

I, Patricia Jeffries, am employed in the city and county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is 150 California Street, 15th Floor, San Francisco, California 94111-4500.

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).

On July 16, 2018, I caused to be served the following document, customized for each recipient, via First Class Mail, on the Sixteenth Omnibus Objection Affected Claimants Service List attached hereto as

Exhibit A:

- *Notice of Objection to Filed Proofs of Claim and Deadline by which a Response must be Filed with the Bankruptcy Court*, a non-customized copy of which is attached hereto as **Exhibit B**.

On July 16, 2018, I caused to be served the following document, via First Class Mail, on the Sixteenth Omnibus Objection Affected Claimants Service List attached hereto as **Exhibit A:**

- *Notice of Hearing and Plan Administrator's Sixteenth Omnibus (Non-Substantive) Objection to Certain Claims (Amended, No Liability, Reduce, Reclassify and Reclassify/Reduce)* [Docket No. 930]

I declare under penalty of perjury, under the laws of the State of California and the United States of America that the foregoing is true and correct.

Executed on July 20, 2018 at San Francisco, California.

/s/ Patricia Jeffries

Patricia Jeffries

EXHIBIT A

Sixteenth Omnibus Objection Affected Claimants Service List

Amended Claims Service List

IL- DEPT OF REVENUE
BANKRUPTCY SECTION
MARY HOBBS
PO BOX 19035
SPRINGFIELD IL 62794-9035

No Liability Claims Service List

CO- DEPT OF LABOR AND EMPLOYMENT UNEMPLOYMENT INSURANCE OPERATIONS PO BOX 8789 DENVER CO 80201-8789	CT- DEPT OF REVENUE SVCS BANKRUPTCY TEAM 450 COLUMBUS BLVD STE 1 HARTFORD CT 6103	CT- MILFORD TAX COLLECTOR OFFICE OF THE CITY ATTORNEY 110 RIVER ST MILFORD CT 6460
CT- MILFORD TAX COLLECTOR GOEHRING RUTTER AND BOEHM P O BOX 3025 MILFORD CT 6460	FL- SARASOTA COUNTY TAX COLLECTOR MELANIE SEVERINO 101 S WASHINGTON BLVD SARASOTA FL 34236-6993	GA- FULTON COUNTY TAX COMMISSIONER 141 PRYOR ST STE 1113 ATLANTA GA 30303
IN- DEPT OF REVENUE CAROL SWAFFAR 100 N SENATE AVE N 240 MS 108 INDIANAPOLIS IN 46204	IRS- DEPT OF THE TREASURY INTERNAL REVENUE SERVICE PO BOX 7346 PHILADELPHIA PA 19101-7346	JOHN R AMES TAX COLLECTOR PO BOX 139066 DALLAS TX 75313-9066
MENDOZA, CATHERINE AKA CATHERINE LIZA MENDOZA 2848 SCOTTSDALE DR SAN JOSE CA 95148	MO- DEPT OF REVENUE BANKRUPTCY UNIT PO BOX 475 JEFFERSON CITY MO 65105	MS- DEPT OF REVENUE BANKRUPTCY SECTION POST OFFICE BOX 22808 JACKSON MS 39225-2808
NM- DEPT OF WORKFORCE SOLUTIONS OFFICE OF GENERAL COUNSEL P O BOX 1928 ALBUQUERQUE NM 87103	OK- TULSA COUNTY TREASURER 500 S DENVER AVE 3RD FLOOR TULSA OK 74103	PA- ALLEGHENY COUNTY CENTRAL TAX COLLECTION DISTRICT 437 GRANT ST 14TH FL PITTSBURGH PA 15219
PA- CITY OF PHILADELPHIA SCHOOL DISTRICT CITY OF PHILADELPHIA LAW DEPT TAX UNIT 1401 JFK BLVD 5TH FL PHILADELPHIA PA 19102	POLARIS HANDELSGESELLSCHAFT MBH KLESTADT WINTERS JURELLER SOUTHARD & STEVENS 200 W 41ST ST 17 FL NEW YORK NY 10036-7203	RI- DIVISION OF TAXATION BANKRUPTCY UNIT 1 CAPITOL HILL PROVIDENCE RI 2908
THE MALL AT MILLENIA PROMOTIONAL FUND LOCK BOX 16286 16286 COLLECTIONS CTR DR CHICAGO IL 60693	TX- FORT BEND COUNTY LINEBARGER GOGGAN BLAIR AND SAMPSON PO BOX 3064 HOUSTON TX 77253-3064	TX- HARRIS COUNTY ET AL LINEBARGER GOGGAN BLAIR AND SAMPSON JOHN P DILLMAN PO BOX 3064

		HOUSTON TX 77253-3064
TX- MIDLAND COUNTY PERDUE BRANDON FIELDER ET AL LAURA J MONROE PO BOX 817 LUBBOCK TX 79408	TX- MONTGOMERY COUNTY LINEBARGER GOGGAN BLAIR AND SAMPSON PO BOX 3064 HOUSTON TX 77253-3064	TX- TAXING DISTRICTS COLLECTED BY POTTER COUNTY PERDUE BRANDON FIELDER ET AL PO BOX 9132 AMARILLO TX 79105-9132
UPSELLITCOM INC AMBAR BARNES 29219 CANWOOD ST STE 240 AGOURA HILLS CA 91301	WILLIS INSURANCE SVC OF C CALIFORNIA INC 525 MARKET ST STE 3400 SAN FRANCISCO CA 94105	

Reduced Claims Service List

AZ- DEPT OF REVENUE OFFICE OF THE ARIZONA ATTORNEY GENERAL CO TAX BANKRUPTCY AND COLLECTION SECTION 1275 W WASHINGTON ST PHOENIX AZ 85007	CIGNA HEALTH AND LIFE INSURANCE 900 COTTAGE GROVE RD HARTFORD CT 6162	DAEJEE METAL CO LTD DRINKER BIDDLE AND REATH LLP STEVEN K KORTANEK 222 DEL AVE STE 1401 WILMINGTON DE 19801
FRONTSTREET FACILITY SOLUTIONS CAROL L RICHTER 4170 VETERANS MEMORIAL HWY BOHEMIA NY 11716	FRONTSTREET FACILITY SOLUTIONS PO BOX 40006 NEWARK NJ 07101-4000	IL- DEPT OF REVENUE BANKRUPTCY SECTION MARY HOBBS PO BOX 19035 SPRINGFIELD IL 62794-9035
KY- LOUISVILLE METRO REVENUE COMM NAOMIROSE L PAULIN 617 W JEFFERSON ST LOUISVILLE KY 40202	LA -DEPT OF REVENUE BANKRUPTCY SECTION P O BOX 66658 BATON ROUGE LA 70896	MO- JACKSON COUNTY COLLECTOR BANKRUPTCY 415 E 12TH ST STE 100 KANSAS CITY MO 64106
OK- TAX COMMISSION SEAN R MCFARLAND 100 N BROADWAY AVE STE 1500 OKLAHOMA CITY OK 73102	PREDICT BIZ INC MEL NUNEZ 19837 HOLLY DR SANTA CLARITA CA 91350	RETENTION SCIENCE 2601 OCEAN PK BLVD SUITE 104 SANTA MONICA CA 90405
ROLLS ROYCE PLC ROLLS ROYCE NORTH AMERICA INC CHARLES BAUGH 1875 EXPLORER ST STE 200 RESTON VA 20190	ROLLS ROYCE PLC BARNES AND THORNBURG LLP MICHAEL K MCCRORY 11 S MERIDIAN ST INDIANAPOLIS IN 46204	SC- DEPT OF REVENUE HERMAN C HARRINGTON PO BOX 12265 COLUMBIA SC 29211
SC- HORRY COUNTY TREASURER RODDY DICKINSON PO BOX 1828 CONWAY SC 29528	SHEPPARD MULLIN RICHTER AND HAMPTON MALANI CADEMARTORI 30 ROCKEFELLER PLZ NEW YORK NY 10112	TSO VERO BEACH LP THE SIMPSON ORGANIZATION INC GIL HEARN 1401 PEACHTREE ST STE 400 ATLANTA GA 30309

TSO VERO BEACH LP ALSTON AND BIRD LLP JONATHAN T EDWARDS 1201 W PEACHTREE ST ATLANTA GA 30309	VA- DEPT OF TAXATION TAXING AUTHORITY CONSULTING SVCS PC MARK K AMES PO BOX 2156 RICHMOND VA 23218	WASTE MANAGEMENT RMC JENNIFER AVILLA 2625 W GRANDVIEW STE 150 PHOENIX AZ 85023
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Reclassified Claims Service List

CA- ALAMEDA COUNTY TAX COLLECTOR JACK WONG 1221 OAK ST OAKLAND CA 94612	CA- FRESNO COUNTY TAX COLLECTOR KIMBERLY K LAMANUZZI PO BOX 1192 FRESNO CA 93715	CA- IMPERIAL COUNTY TREASURER TAX COLLECOR 23466 FLORA OROPEZA 940 W MAIN ST STE 106 EL CENTRO CA 92243
CT- TAX COLLECTOR CITY OF DANBURY ROOSEVELT EWELL 155 DEER HILL AVE DANBURY CT 6810	GAFLANA INDUSTRY LIMITED GLD FUND RECOVERY LLC DANIEL GORDON PO BOX 237110 NEW YORK NY 10023	KRISTINA BROWN 3553 LONDON ST LOS ANGELES CA 90026
MD- PRINCE GEORGES COUNTY MEYERS RODBELL AND ROSENBAUM PA M EVAN MEYERS 6801 KENILWORTH AVE STE 400 RIVERDALE PARK MD 20737	MS- DEPT OF REVENUE BANKRUPTCY SECTION POST OFFICE BOX 22808 JACKSON MS 39225-2808	PIERCE COUNTY BUDGET AND FINANCE PIERCE COUNTY FINANCE DEPT ALLEN RICHARDSON 950 FAWCETT AVE STE 100 TACOMA WA 98402-5603
PIERCE COUNTY BUDGET AND FINANCE PIERCE COUNTY FINANCE DEPT ALLEN RICHARDSON 950 FAWCETT AVE STE 100 TACOMA WA 98402-5603	PR- MUNICIPIO AUTONOMO DE JUANA DIAZ MUNICIPIO DE JUANA DIAZ INGRID G PEREZ PO BOX 1409 JUANA DIAZ PR 00795-1409	THERMAL AIR CONDITIONING INC ROBERT CANIZALEZ PO BOX 70737 PASADENA CA 91117
TIMBERWOLFF CONSTRUCTION INC 1659 W ARROW RTE UPLAND CA 91786	TN- CITY OF KNOXVILLE MARK A BYRD P O BOX 1028 KNOXVILLE TN 37901	TX- CITY OF BAYTOWN RANDALL B STRONG 407 W BAKER RD STE T BAYTOWN TX 77521

Reclassify & Reduce Claims Service List

CA- CITY OF FRESNO YVONNE SPENCE CITY CLERK 2600 FRESNO ST RM 2133 FRESNO CA 93721	CA- CITY OF GILROY IRMA NAVARRO 7351 ROSANNA ST GILROY CA 95020	NC- CUMBERLAND COUNTY TAX COLLECTOR ROBYN L CABELL PO BOX 449 FAYETTEVILLE NC 28302
TCF EQUIPMENT FINANCE INC A DIV OF TCF NATIONAL BANK MICHAEL SPRINGER 11100 WAYZATA BLVD STE 801 MINNETONKA MN 55305	TN- CITY OF KNOXVILLE MARK A BYRD P O BOX 1028 KNOXVILLE TN 37901	WA- CITY OF SEATTLE LICENSE AND TAX ADMINISTRATION 700 5TH AVE STE 4250 PO BOX 34214 SEATTLE WA 98124

EXHIBIT B

Notice of Objection to Filed Proofs of Claim and Deadline

by which a Response must be Filed with the Bankruptcy Court (non-customized)

Robert J. Feinstein, Esq.
Bradford J. Sandler, Esq.
Maria A. Bove, Esq.
PACHULSKI STANG ZIEHL & JONES LLP
780 Third Avenue, 34th Floor
New York, New York 10017
Telephone: (212) 561-7700
Facsimile: (212) 561-7777

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		

**NOTICE OF OBJECTION TO FILED PROOFS OF CLAIM AND DEADLINE
BY WHICH A RESPONSE MUST BE FILED WITH THE BANKRUPTCY COURT**

PLEASE TAKE NOTICE that David MacGreevey, in his capacity as plan administrator (the “Plan Administrator”) acting on behalf of Runway Liquidation Holdings, LLC, and its affiliated post-effective date debtors (collectively, the “Post-Effective Date Debtors” and before the Effective Date of the Plan, the “Debtors”),² is objecting to your Claim(s) by the attached objection (the “Objection”).

YOU SHOULD LOCATE YOUR NAME AND YOUR CLAIM(S) ON THE SCHEDULES ATTACHED HERETO. PLEASE TAKE NOTICE THAT, AS A RESULT OF THE OBJECTION, YOUR CLAIM(S) MAY BE DISALLOWED, EXPUNGED, RECLASSIFIED, MODIFIED IN PRIORITY AND/OR AMOUNT OR OTHERWISE AFFECTED. THEREFORE, PLEASE READ THIS NOTICE AND THE ACCOMPANYING OBJECTION VERY CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.

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, follows: Runway Liquidation Holdings, LLC (6857); Runway Liquidation, LLC (5942); Runway Liquidation Intermediate Holdings, LLC (3673); MR Liquidation, LLC (9200); and MMH Liquidation, LLC (3854).

² All capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Objection.

Important Information Regarding the Objection

Grounds for the Objection. By the Objection, the Plan Administrator is seeking to disallow or modify your Claim(s) listed in the table below on the grounds that your Claim(s): (i) has/have been amended and superseded by one or more claims subsequently filed claims by, or on behalf of, the same claimant in respect of the same liabilities; (ii) seek(s) recovery of amounts for which the Debtors are not liable; (iii) either failed to provide sufficient documentation to support the amount of the claim or showed a record of indebtedness that is not reflected on the Debtors’ books and records; (iv) either failed to provide sufficient documentation to support the asserted priority or asserted a priority not supported under the Bankruptcy Code; and/or (v) failed to provide sufficient documentation to support the asserted priority or asserted a priority not supported under the Bankruptcy Code; and either failed to provide sufficient documentation to support the amount of the claim or showed a record of indebtedness that is not reflected on the Debtors’ books and records. The Claims subject to the Objection may also be found on the schedules attached to the Objection, a copy of which has been provided with this notice.

Claimant Name	Claim No.	Debtor	Asserted Claim Amount	Asserted Priority	Basis For Objection	Proposed Treatment	Proposed Modified Amount	Surviving Claim No.

Objection Procedures. On September 28, 2017, the United States Bankruptcy Court for the Southern District of New York (the “Court”) entered an order [Docket No. 710] approving procedures for filing and resolving objections to Claims asserted against the Debtors in the chapter 11 cases (the “Objection Procedures”). *Please review the Objection Procedures to ensure your response to the Objection, if any, is timely and correctly filed and served.*

Resolving the Objection

Resolving the Objections. To facilitate the consensual resolution of the Objection, certain of the Plan Administrator’s personnel and advisors will be available to discuss and potentially resolve the Objection to disputed Claims without the need for filing a formal response or attending a hearing. To facilitate such a discussion, please contact Jason S. Pomerantz of Pachulski Stang Ziehl & Jones LLP, counsel to the Plan Administrator, by (i) emailing jspomerantz@pszjlaw.com or (ii) calling (310) 277-6910 within twenty (20) calendar days after the date of this notice. Please have your Proof(s) of Claim and any related material available for such discussions.

Parties Required to File a Response. If you are not able to consensually resolve the Objection filed with respect to your Claim as set forth above, you must file a response (each, a “Response”) with the Court in accordance with the procedures described below.

Response Contents. Each Response must contain the following (at a minimum):

- a. a caption stating the name of the Court, the names of the Debtors, the case number, the title of the Objection to which the Response is directed, and, if applicable, the Proof of Claim number(s) related thereto from the Claims Register;

- b. a concise statement setting forth the reasons why the Court should not sustain the Objection with respect to such Claim, including the factual and legal bases upon which the claimant will rely in opposing the Objection;
- c. a copy of any other documentation or other evidence of the Claim, to the extent not already included with the Proof of Claim, upon which the claimant will rely in opposing the Objection; *provided, however*, that the claimant need not disclose confidential, proprietary, or otherwise protected information in the Response; *provided further, however*, that the claimant shall disclose to the Plan Administrator all information and provide copies of all documents that the claimant believes to be confidential, proprietary, or otherwise protected and upon which the claimant intends to rely in support of its Claim, subject to appropriate confidentiality constraints; and
- d. the following contact information for the responding party:
 - i. the name, address, telephone number, and email address of the responding claimant or the name, address, telephone number, and email address of the claimant’s attorney or designated representative to whom the attorneys for the Plan Administrator should serve a reply to the Response, if any; or
 - ii. the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the Objection on the claimant’s behalf.

Notice and Service. Your Response must be filed with the Court and served so as to be *actually received by 4:00 p.m. (prevailing Eastern Time) on August 6, 2018* (the “Response Deadline”) by the following parties (the “Notice Parties”):

Plan Administrator	Counsel to the Plan Administrator	United States Trustee
<p>David MacGreevey c/o Zolfo Cooper, LLC 1114 Avenue of the Americas, 41st Floor New York, NY 10036</p>	<p>Pachulski Stang Ziehl & Jones, LLP 780 Third Avenue, 34th Floor New York, NY 10017 Attn: Robert J. Feinstein</p> <p style="text-align: center;">-and-</p> <p>Pachulski Stang Ziehl & Jones LLP 10100 Santa Monica Blvd., 13th Floor Los Angeles, CA 90067 Attn: Jason S. Pomerantz</p>	<p>Office of the United States Trustee for the Southern District of New York 201 Varick Street, Suite 1006 New York, NY 10014 Attn: Brian S. Masumoto</p>

Failure to Respond. A Response that is not filed and served by the Response Deadline in accordance with the procedures set forth herein may not be considered by the Court at the Hearing.

Absent reaching an agreement with the Plan Administrator resolving the Objection to a Claim, failure to timely file and serve a Response as set forth herein may result in the Court sustaining the Objection without further notice or hearing. Upon entry of an order, affected creditors will be served with a notice of entry, and a copy of the order.

Hearing on the Objection

Date, Time, and Location. A hearing (the "Hearing") regarding the Objection will be held on August 15, 2018, at 11:00 a.m. prevailing Eastern Time, before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, in Courtroom 623 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10014. The hearing may be adjourned to a subsequent date in these cases in the Court's or Plan Administrator's discretion. **You must attend the Hearing if you disagree with the Objection and have filed a Response.** If the Objection cannot be resolved and a hearing is determined to be necessary, the Plan Administrator shall file with the Court and serve on the affected claimants a notice of the hearing, to the extent the Plan Administrator did not file a notice of hearing previously.

Discovery. If the Plan Administrator determines that discovery is necessary in advance of a hearing on an Objection, the Plan Administrator will serve notice on the affected claimant and its counsel of record (if any) that the scheduled hearing will be treated as a status conference during which the parties will request that the Court issue a scheduling order to facilitate dismissal or resolution of the litigation. Such notice may be incorporated into the initial agenda letter for the hearing, or may be provided by separate notice. In accordance with Local Bankruptcy Rule 9014-2, the first hearing on any Objection contested with respect to a particular Claim will not be an evidentiary hearing and there is no need for any witnesses to appear at such a hearing unless otherwise ordered by the Court in accordance with Local Bankruptcy Rule 9014-2.

Additional Information

Additional Information. Copies of the Objection Procedures, the Objection, order approving such Objection Procedures or any other pleadings (the "Pleadings") filed in the chapter 11 cases are available free online at the website of Donlin Recano & Company, Inc., at <http://www.donlinrecano.com/bcbg>. You also may obtain copies of any of the Pleadings filed in the chapter 11 cases for a fee via PACER at <http://www.nysb.uscourts.gov>.

Reservation of Rights

NOTHING IN ANY OBJECTION OR OBJECTION NOTICE IS OR SHALL BE DEEMED TO CONSTITUTE A WAIVER OF ANY RIGHTS OF THE DEBTORS, POST-EFFECTIVE DATE DEBTORS OR PLAN ADMINISTRATOR, AS APPLICABLE, TO DISPUTE ANY CLAIMS, ASSERT COUNTERCLAIMS, RIGHTS OF SETOFF OR RECOUPMENT, DEFENSES, OBJECT TO CLAIMS (OR OTHER CLAIMS OR CAUSES OF ACTION OF A CLAIMANT) ON ANY GROUNDS NOT PREVIOUSLY RAISED IN AN OBJECTION, UNLESS THE COURT HAS ORDERED OTHERWISE, OR SEEK TO ESTIMATE ANY CLAIM AT A LATER DATE. AFFECTED PARTIES WILL BE PROVIDED APPROPRIATE NOTICE THEREOF AT SUCH TIME.

Dated: July 16, 2018

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Maria A. Bove

Robert J. Feinstein, Esq.

Bradford J. Sandler, Esq.

Maria A. Bove, Esq.

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