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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	:	Case No. 17-10466 (SCC)
HOLDINGS, LLC, et al.,¹	:	
	:	Jointly Administered
Debtors.	:	
-----X		

**CERTIFICATION OF COUNSEL REGARDING PLAN ADMINISTRATOR’S
OBJECTION TO PROOF OF CLAIM NUMBER 598 FILED BY DAVID JEHAN**

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 August 10, 2018, counsel to David MacGreevey, in his capacity as the plan administrator (“Plan Administrator”) filed the *Plan Administrator’s Objection to Proof of Claim*

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).

Number 598 Filed by David Jehan [Docket No. 962] (the “Objection”) with the United States Bankruptcy Court for the Southern District of New York (the “Court”).

2. Pursuant to the *Notice of Hearing on Plan Administrator’s Objection to Proof of Claim Number 598 Filed by David Jehan* [Docket No. 962], responses to the Objection were to be filed and served no later than September 6, 2018, at 4:00 p.m. (the “Objection Deadline”).

3. The Case Management Procedures provide 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.

4. The undersigned counsel hereby certifies that, as of the date hereof, no answer, objection, or other response to the 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 Objection appears thereon.

5. Accordingly, the undersigned respectfully requests that the Court enter the order attached hereto as Exhibit 1 in accordance with the procedures described in the Case Management Order.

Dated: September 11, 2018

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Beth E. Levine

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EXHIBIT 1

Proposed Order

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RUNWAY LIQUIDATION	:	Case No. 17-10466 (SCC)
HOLDINGS, LLC, et al.,¹	:	
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**ORDER GRANTING PLAN ADMINISTRATOR’S OBJECTION TO
PROOF OF CLAIM NUMBER 598 FILED BY DAVID JEHAN**

Upon the objection (the “Objection”)² of the Plan Administrator seeking entry of an order (this “Order”) disallowing proof of claim number 598 (“Claim No. 598”) filed by David Jehan (“Claimant”) in its entirety pursuant to sections 105(a) and 502(b) of the Bankruptcy Code and Bankruptcy Rule 3007; the Court having jurisdiction to consider the Objection and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and consideration of the Objection and relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and sufficient notice

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

of the Objection having been provided and opportunity for response having been given; and it appearing that no other or further notice need be provided; and the Court having considered the Objection, Claim No. 598, and any responses to the Objection; and the Court having found the legal and factual bases set forth in the Objection establish just cause for the relief granted herein, and upon the record herein; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The relief requested in the Objection is granted as set forth herein.
2. Claim No. 598 is hereby disallowed and expunged.
3. Donlin Recano, the Post-Effective Date Debtors' noticing and claims agent, is authorized to update the Claims Register to reflect the relief granted in this Order.
4. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
5. This Court shall retain jurisdiction with respect to all matters related to or arising from the Objection or the implementation or interpretation of this Order.

Dated: _____, 2017

THE HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE