

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MINNESOTA

In re:

Gander Mountain Company,
Overton's, Inc.,

Debtors

Jointly Administered Under
Case No. 17-30673 (MER)

Case No. 17-30673
Case No. 17-30576

Chapter 11 Cases

OBJECTION OF HEALTHCARE IMPACT ASSOCIATES, LLC TO PROPOSED CURE AMOUNT

1. HealthCare Impact Associates, LLC (“HealthCare”), a creditor in the above-captioned case, objects to the cure amount (the “Cure Amount”) set forth in Debtors’ Notice of Cure Amount (the “Cure Notice”) dated May 16, 2017, and states the following in support of its objection:

OBJECTION

2. The Debtor Gander Mountain Company and HealthCare are parties to a Software and Service Agreement dated July 1, 2015. Attached hereto as Exhibit A is a true and correct copy of the Software and Service Agreement.

3. Exhibit 1 to the Cure Notice incorrectly states that the Cure Amount under the agreement is \$0.00.

4. The correct Cure Amount is \$13,233.23. Attached hereto as Exhibit B is a true and correct copy of a Gander Mountain Open Balance Report showing the amount owing.

Attached hereto as Exhibit C are copies of the outstanding invoices under the Software and Service Agreement.

5. In accordance with the Cure Notice, HealthCare objects only to the Debtor's proposed Cure Amount, and reserves all other objections, if any, at this time.

Dated: May 18, 2017

BARNA, GUZY & STEFFEN LTD.

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