

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MINNESOTA

In re:	Jointly Administered Under
Gander Mountain Company,	Case No. 17-30673 (MER)
Overton's, Inc.,	Case No. 17-30673
Debtors.	Case No. 17-30675
	Chapter 11 Cases

---

**OBJECTION OF CREDITOR STRIKE KING LURES CO.  
TO DEBTORS' NOTICE OF STATEMENT OF  
RECLAMATION AND TWENTY DAY CLAIMS  
[D.E. #1242]**

---

Comes Creditor and Interested Party, Strike King Lures, Co., ("Strike King"), by and through its attorney, and submits this Objection to the Debtors' Notice of Statement of Reclamation and Twenty Day Claims filed with the Court on or about September 20, 2017 [Docket No. 1242] ("Objection"). In support of the Objection, Strike King would show as follows:

1. On or about March 28, 2017, Strike King submitted its "Reclamation Claim" to the Debtor and other interested parties pursuant to the Claims Procedures Order in the above-captioned Chapter 11 Cases of Gander Mount Company and Overton's Inc. [Docket No. 211]
2. Pursuant to the Claims Procedures Order, the Debtor filed its Notice of Statement of Reclamation and Twenty Day Claims on September 20, 2017, ("Notice") [Docket No. 1242], deeming Strike King Lures, Co.'s reclamation demand in the amount of \$144,750.48, as invalid. The only stated reason for the objection was the contention that the reclamation claim had no value "because the prepetition lenders' interests and the DIP Agent's interests in the Debtors'

assets, including the goods that are the subject of this Reclamation Claim, are superior to the Reclamation Claim.”

3. Strike King objects to this treatment, demands strict proof of the allegations relating to Debtor’s arrangements with its lenders and its DIP financing, and further demands that the Debtor marshal its assets to the extent necessary to protect the rights of its Reclamation Claim. Strike King asserts that such equitable marshalling can be done without detriment to senior creditors.

4. Strike King further reserves all of its rights, both legal and equitable, with respect to all of its claims, including its Reclamation Claim; its opposition to Debtors’ Notice of Cure Amount [Docket No. 377], as set forth in Strike King’s Objection to Notice of Cure Amount [Docket No. 555]; and all of its rights under its Amended Proof of Claim No. 20409-2.

5. Strike King joins in and adopts the legal arguments made by other reclamation claimants.

WHEREFORE, Strike King objects to its treatment by the Debtor pursuant to the Notice and the Claims Procedures Order, invokes its rights for resolution of this dispute pursuant to said Order, reasserts its reclamation demand for \$144,750.48, and seeks such other relief to which it may be entitled under the circumstances.

Respectfully submitted,

EVANS | PETREE, P.C.

/s/ David J. Cocke  
David J. Cocke (*pro hac vice*)  
1000 Ridgeway Loop Road, Suite 200  
Memphis, TN 38120  
(901) 525-6781 – Telephone  
(901) 525-0681 - Facsimile  
Email: [dcocke@evanspetree.com](mailto:dcocke@evanspetree.com)  
Attorneys for Creditor Strike King Lures Co.