

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MINNESOTA**

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

**OMNIBUS LIMITED OBJECTION OF THE LIQUIDATING TRUSTEE TO THE
MOTIONS FOR PAYMENT OF ADMINISTRATIVE EXPENSES FILED BY SYLVAN
PARK APARTMENTS, LLC, MAGUL INDUSTRIES, CORP., AND SIG SAUER, INC.**

META Advisors, LLC, in its capacity as the liquidating trustee (the “**Liquidating Trustee**”)¹ for the bankruptcy estates of the above-caption debtors (collectively, the “**Debtors**”), by and through its undersigned counsel, Barnes & Thornburg LLP and Lowenstein Sandler LLP, files this omnibus limited objection to the Motions for Administrative Expenses filed by Magpul Industries Corp. (“**Magpul**”) [Docket No. 1482], Sig Sauer, Inc. (“**Sig Sauer**”) [Docket No. 1490], and Sylvan Park Apartments, LLC (“**Sylvan**”) [Docket No. 1533] (collectively, the “**Motions**”).

OBJECTION

On February 8, 2018 (the “**Effective Date**”), the Court entered the *Notice of Confirmation and Effective Date of Debtors’ and Official Committee of Unsecured Creditors’ Joint Chapter 11 Plan of Liquidation Dated October 31, 2017* (the “**Notice of Effective Date**”)

¹ On January 26, 2018, the Court confirmed a Joint Chapter 11 Plan of Liquidation of the Debtors and the Official Committee of Unsecured Creditors dated October 31, 2017 (“**Plan**”) [Docket No. 1359]. Under the order confirming the Plan, the Liquidating Trustee was appointed to act as the representative of the estate within the meaning of 11 U.S.C. § 1123(b)(3), including to, among other things, pursue objections to claims.

[Doc. No. 1590]. Pursuant to the Notice of Effective Date, the deadline for the Liquidating Trustee to file objections to claims is July 10, 2018 (the “**Claims Objection Bar Date**”).

Since the Effective Date the Liquidating Trustee has worked diligently to identify issues and tasks, develop the appropriate work-streams necessary for the winding up of the Debtors’ estates, and begin the process of reviewing the approximately 22,000 claims filed in these Chapter 11 Cases. Notwithstanding these diligent efforts of the Liquidating Trustee and its professionals over the last several weeks, there have been customary delays in the implementation of these work-streams and the review of pending claims. The Liquidating Trustee only received last week the claims register in an electronic format that allows for the review, sorting and tracking of claims. Moreover, pursuant to the Notice of Effective Date, the last day for claimants to file administrative claims passed just earlier this week on March 12, 2018.

As such, the Liquidating Trustee has not yet had a reasonable opportunity to review and fully consider in a deliberate and efficient manner the claims and relief requested in the Motions filed by Sylvan, Magpul, and Sig Sauer. The Liquidating Trustee requested that Sig Sauer and Magpul agree to adjourn the hearing to consider their respective motions, however, they have each refused to do so unconditionally. The Liquidating Trustee has agreed in principle to a settlement of the Sylvan Motion and anticipates such settlement will be finalized in the short term.

Accordingly, the Liquidating Trustee respectfully requests that this Court adjourn consideration of the Motions, and extend the respective response deadlines, for a period of two months to afford the Liquidating Trustee an appropriate amount of time to review and reconcile

the affected claims and engage the movants in settlement discussions, or alternatively, allow for adequate time to respond to the Motions on a contested basis.

CONCLUSION

WHEREFORE, for the foregoing reasons, the Liquidating Trustee respectfully requests that this Court deny the Motions or continue the hearing on the Motions to allow the Liquidating Trustee adequate time to review and reconcile the subject claims, and grant all other relief that the Court deems just and proper.

Dated: March 16, 2018

Respectfully Submitted,

BARNES & THORNBURG LLP

/s/ Christopher J. Knapp
Christopher J. Knapp, #0344412
Connie A. Lahn, #0269219
Barnes & Thornburg LLP
2800 Capella Tower
225 South Sixth Street
Minneapolis, MN 55402-4662
Telephone: (612) 333-2111
Facsimile: (612) 333-6798
Christopher.Knapp@btlaw.com
Connie.Lahn@btlaw.com

--and--

LOWENSTEIN SANDLER LLP
Jeffrey Cohen
Keara M. Waldron
1251 Avenue of the Americas
New York, NY 10020
Telephone: (212) 262-6700
Facsimile: (212) 262-7402
jcohen@lowenstein.com
kwaldron@lowenstein.com

ATTORNEYS FOR META ADVISORS,
LLC, IN ITS CAPACITY AS THE
LIQUIDATING TRUSTEE