

**UNITED STATES BANKRUPTCY COURT
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

**CERTIFICATION OF COUNSEL REGARDING THE LIQUIDATING TRUSTEE'S
FIFTH OMNIBUS MOTION OBJECTING TO DUPLICATE CLAIMS**

The undersigned hereby certifies as follows:

1. On November 15, 2018, the Gander Mountain Liquidating Trust (the "Trust") and META Advisors LLC, in its capacity as liquidating trustee (the "Liquidating Trustee") of the Trust, by and through its undersigned counsel, filed the Liquidating Trustee's Fifth Omnibus Motion Objecting to Duplicate Claims (Docket No. 1830) (the "Fifth Omnibus Motion").
2. The Notice of Hearing established January 4, 2019 as the deadline (the "Response Deadline") for receipt of responses to the Fifth Omnibus Motion.
3. The Liquidating Trustee received an informal response from the following claimant:
 - a. KY – Bowling Green Kentucky concerning its proof of claim number 1141.1 ("Claim 1141.1").
4. Through further analysis, the Liquidating Trustee discovered Claim 1141.1 was improperly included in the Fifth Omnibus Objection.
5. The Liquidating Trustee's correction is reflected on the redline to the proposed Order annexed hereto.

6. For the Court's convenience, a redline showing changes to the proposed Order filed with the Fifth Omnibus Motion is annexed hereto as Exhibit A.

7. The Liquidating Trustee respectfully requests that this Court enter the proposed Order annexed hereto as Exhibit B.

Dated: January 8, 2019

Respectfully Submitted,

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*Counsel for the Gander Mountain
Liquidating Trust*

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re:	Jointly Administered Under Case No. 17-30673 (MER)
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**ORDER GRANTING THE LIQUIDATING TRUSTEE’S FIFTH OMNIBUS MOTION
OBJECTING TO THE DUPLICATE CLAIMS**

This matter is before the court on the Liquidating Trustee’s Motion (“Motion”) Objecting to Duplicate Claims. Based on the Motion and the documents of record herein,

IT IS ORDERED:

1. The Motion is granted.
2. The Claims identified in the following chart, under the column “Disallowed Claim No.” (the “Duplicate Claims”), are hereby disallowed and expunged in their entirety:

Claimant Name	Remaining Claim No.	Remaining Claim Amount	Remaining Claim Classification	Disallowed Claim No.	Disallowed Claim Amount	Disallowed Claim Classification
KY – BOWLING GREEN CITY GOVERNMENT	1143.1	\$30.00	Priority	1141.1	\$30.00	Priority
NATIONAL UNION FIRE INSURANCE CO ET AL	533.1	\$2,972,726	Secured	476.1	\$2,972,726	Secured
NY – DEPT OF TAXATION AND FINANCE	512.3	\$4,015,483.30	Priority	20407.1	\$4,015,483.30	Priority
TX – CITY OF WACO OR WACO ISD	58.3	\$81,255.25	Secured	58.2	\$81,255.25	Secured
TYLER WORD	2141.1	\$99.42	Secured	2139.1	\$99.42	Secured
WI – TOWN OF BURKE – TREASURER	488.2	\$26,620.07	Priority	488.1	\$26,620.07	Priority

3. The rights of the Trust and the Liquidating Trustee to: (i) file subsequent objections to any of the Duplicate Claims on any ground (substantive or non-substantive); (ii) amend, modify

or supplement the Motion, including, without limitation, filing objections to further amended or newly filed claims; (iii) seek to expunge or reduce any Claim to the extent all or a portion of such Claim has been paid; and (iv) settle any Claim for less than the asserted amount, are expressly preserved. Additionally, should the grounds of objection stated in the Motion be overruled, the Liquidating Trustee's rights to object to the Duplicate Claims on any other grounds are preserved.

4. To the extent that the Duplicate Claims are also the subject of a separate claim objection, or become subject to a separate claim objection, on other grounds, whether by separate motion or through an adversary proceeding, this Order does not affect, eliminate, or determine those separate objections.

5. For the avoidance of doubt, nothing in the Motion or this Order impacts in any way the Liquidating Trustee's pending objection to any Claim under section 502(d) of the Bankruptcy Code included in any complaint filed pursuant to section 5 of the Bankruptcy Code.

6. The objection to each Claim, as addressed in the Motion and as set forth in the chart above, constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each such Claim that is the subject of the Motion. Any stay of this Order pending appeal by any claimants whose Claims are subject to this Order shall only apply to the contested matter that involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to any other contested matters addressed in the Motion and this Order.

7. The Trust and the Liquidating Trustee are authorized to take any and all actions that are necessary and appropriate to give effect to this Order.

8. This Court shall retain jurisdiction over all matters arising from or related to the interpretation and implementation of this Order.

Dated: _____, 2019.

Judge Michael E. Ridgway
United States Bankruptcy Judge

EXHIBIT B

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re:	Jointly Administered Under Case No. 17-30673 (MER)
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OBJECTING TO THE DUPLICATE CLAIMS**

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IT IS ORDERED:

1. The Motion is granted.
2. The Claims identified in the following chart, under the column “Disallowed Claim No.” (the “Duplicate Claims”), are hereby disallowed and expunged in their entirety:

Claimant Name	Remaining Claim No.	Remaining Claim Amount	Remaining Claim Classification	Disallowed Claim No.	Disallowed Claim Amount	Disallowed Claim Classification
NATIONAL UNION FIRE INSURANCE CO ET AL NY – DEPT OF TAXATION AND FINANCE	533.1	\$2,972,726	Secured	476.1	\$2,972,726	Secured
TX – CITY OF WACO OR WACO ISD	512.3	\$4,015,483.30	Priority	20407.1	\$4,015,483.30	Priority
TYLER WORD	58.3	\$81,255.25	Secured	58.2	\$81,255.25	Secured
WI – TOWN OF BURKE – TREASURER	2141.1	\$99.42	Secured	2139.1	\$99.42	Secured
	488.2	\$26,620.07	Priority	488.1	\$26,620.07	Priority

3. The rights of the Trust and the Liquidating Trustee to: (i) file subsequent objections to any of the Duplicate Claims on any ground (substantive or non-substantive); (ii) amend, modify or supplement the Motion, including, without limitation, filing objections to further amended or

newly filed claims; (iii) seek to expunge or reduce any Claim to the extent all or a portion of such Claim has been paid; and (iv) settle any Claim for less than the asserted amount, are expressly preserved. Additionally, should the grounds of objection stated in the Motion be overruled, the Liquidating Trustee's rights to object to the Duplicate Claims on any other grounds are preserved.

4. To the extent that the Duplicate Claims are also the subject of a separate claim objection, or become subject to a separate claim objection, on other grounds, whether by separate motion or through an adversary proceeding, this Order does not affect, eliminate, or determine those separate objections.

5. For the avoidance of doubt, nothing in the Motion or this Order impacts in any way the Liquidating Trustee's pending objection to any Claim under section 502(d) of the Bankruptcy Code included in any complaint filed pursuant to section 5 of the Bankruptcy Code.

6. The objection to each Claim, as addressed in the Motion and as set forth in the chart above, constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each such Claim that is the subject of the Motion. Any stay of this Order pending appeal by any claimants whose Claims are subject to this Order shall only apply to the contested matter that involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to any other contested matters addressed in the Motion and this Order.

7. The Trust and the Liquidating Trustee are authorized to take any and all actions that are necessary and appropriate to give effect to this Order.

8. This Court shall retain jurisdiction over all matters arising from or related to the interpretation and implementation of this Order.

Dated: _____, 2019.

Judge Michael E. Ridgway
United States Bankruptcy Judge