

**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

**NOTICE OF HEARING AND LIQUIDATING TRUSTEE'S
SIXTEENTH OMNIBUS MOTION OBJECTING TO CERTAIN EMPLOYEE CLAIMS
FOR INSUFFICIENT SUPPORTING DOCUMENTATION**

TO: The entities specified in Local Rule 3007-1. **Recipients should review Paragraph 13 to locate their names and Claims addressed by this Motion.**

1. The Gander Mountain Liquidating Trust ("Trust") and META Advisors LLC, in its capacity as the liquidating trustee ("Liquidating Trustee") of the Trust, by and through its undersigned counsel, moves the Court ("Motion") for the relief requested below and entry of an order substantially in the form submitted herewith ("Proposed Order"), holding certain improperly filed proof of claims as not being treated as prima facie evidence of validity of the claim amount and disallowing such claims, and gives notice of a hearing.

2. The Motion seeks to eliminate or modify your claim(s) in the manner listed below:

Personalized Claim Information Here

3. The Court will hold a hearing on this Motion at 10:00 a.m. on Wednesday, May 15, 2019, in Courtroom 7 West, United States Courthouse, 300 South Fourth Street, Minneapolis, MN, 55415.

4. Any response to this Motion must be filed and served no later than Friday, May 10, 2019, which is five (5) days before the time set for the hearing (including Saturdays, Sundays, and holidays). **UNLESS A RESPONSE OPPOSING THE MOTION IS TIMELY FILED, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT A HEARING.** In the event a response is timely filed, and the Court determines there are facts in dispute which require an evidentiary hearing, the Liquidating Trustee requests that the Court treat the hearing scheduled above as a scheduling conference for purposes of setting the matter for evidentiary hearing.

5. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334, Fed. R. Bankr. P. 5005, and Local Rule 1070-1. This is a core proceeding.

6. This Motion arises under 11 U.S.C. §§ 502 and 507, and is filed under Fed. R. Bankr. P. 3007(d)(6) and Local Rules 3007-1 and 9013-1 through 9013-3.

PROCEDURAL BACKGROUND

7. The petitions commencing these Chapter 11 cases were filed by the above-captioned debtors (“Debtors”) on March 10, 2017 (“Petition Date”).

8. On March 21, 2017, the Court filed a Notice of Chapter 11 Bankruptcy Cases which, among other things, established July 17, 2017 as the deadline by which creditors, including governmental units, must file proofs of claim.

9. On April 12, 2017, the Debtors filed a consolidated set of schedules of assets and liabilities and statement of financial affairs (“Schedules”), setting forth the consolidated assets and

liabilities of the Debtors. Additionally, in the ordinary course of business, the Debtors maintained books and records that reflect, among other things, the Debtors' aggregate liabilities and the specific amounts owed to each of their creditors.

10. On January 26, 2018, the Court entered an order ("Confirmation Order") confirming the *Debtors' and Official Committee of Unsecured Creditors' Joint Plan of Liquidation dated October 31, 2017* ("Plan"). The effective date of the Plan occurred on February 8, 2018 ("Effective Date").

11. As set forth in paragraphs 22 through 25 of the Confirmation Order and Article IV.A of the Plan, the estates of the Debtors were substantively consolidated for the purposes of confirming and consummating the Plan, including, but not limited to, making distributions in accordance with the terms of the Plan. Specifically, the Plan provides, *inter alia*, that on and after the Effective Date (i) all assets and liabilities of the Debtors are treated as though they are pooled, (ii) each claim filed or to be filed against either Debtor, as to which both Debtors are co-liable as a legal or contractual matter, is deemed filed as a single claim against, and single obligation of, the Debtors, (iii) all guarantees of any Debtor of the obligations of the other Debtor are eliminated so that any claim against any Debtor and any claim based upon a guarantee thereof executed by the other Debtor is treated as one claim against the substantively consolidated Debtors, and (iv) any joint or several liability of any of the Debtors is one obligation of the substantively consolidated Debtors and any claims based upon such joint or several liability is treated as one claim against the substantively consolidated Debtors.

12. The Plan established the Trust for the purpose of, among other things, collecting and administering all of the Debtors' assets. The Plan appointed the Liquidating Trustee to administer the Liquidating Trust and to act as the representative of the estate within the meaning

of 11 U.S.C. § 1123(b)(3)(B). The Plan grants the Liquidating Trustee the authority to address and resolve issues involving objections, reconciliation, and allowance of claims in accordance with the Plan.

13. The following table of claims (the “Disputed Claims”) identified have been submitted in a form that does not comply with applicable rules because they have been submitted with insufficient documentation evidencing the bases for the claims, and thus the Trust is unable to determine the validity of the Disputed Claims:¹

Claimant	Claim Number	Claim Date	Asserted Priority	Claim Amount
Mark Beresford	8280-1	6/12/17	Priority Pursuant to § 507(a)(4)	\$3,590.50
Derek Siddons	6194-1	6/8/17	General Unsecured	\$150,050.00
Derek Siddons	6194-1	6/8/17	Priority Pursuant to § 507(a)(4)	\$12,475.00
Dustin Sumner	17391-1	7/17/17	Priority Pursuant to § 507(a)(4)	\$2,000.00
Chanese Thomas	114-1	3/27/17	General Unsecured	\$0.00
David Varrett	18238-1	7/12/17	Priority Pursuant to § 507(a)(4)	\$5,514.54
Laura Walleen	145-1	3/29/17	Priority Pursuant to § 507(a)(4)	\$17,653.00

14. Furthermore, the Liquidating Trustee has examined the books and records of the Debtors which reflect that no amounts are owed on account of each of the above-identified Disputed Claims.

15. By this Motion, the Liquidating Trustee (1) objects to the Disputed Claims as being submitted with insufficient supporting documentation and thus in a form not in compliance with applicable bankruptcy rules; (2) objects to the Disputed Claims as not supported by the Debtors’ books and records; and (3) requests entry of an order substantially in the form of the Proposed

¹ For the avoidance of doubt, the Liquidating Trustee states that many of the Claims are objectionable on additional grounds beyond that made in this Motion, and therefore reserves all rights to object in the future to the Claims, on any grounds permitted under applicable law.

Order holding the Disputed Claims, as improperly filed, are not entitled to be treated as prima facie evidence of validity, and disallowing such claims.

GROUND FOR OBJECTION

16. The Liquidating Trustee objects to each of the Disputed Claims as being submitted with insufficient documentation and thus in a form that does not comply with applicable rules. The Liquidating Trustee has reviewed the Disputed Claims and, because of such noncompliance, is unable to determine the validity of the Disputed Claims. Furthermore, the Liquidating Trustee has reviewed the books and records of the Debtors and has determined that the Debtors' records reflect that no amounts are owed on account of the Disputed Claims.

17. Because the Disputed Claims have been submitted without sufficient documentation to support the amounts claimed, the Disputed Claims are not entitled to be considered prima facie evidence of validity under Bankruptcy Rule 3001(f). Furthermore, the Disputed Claims are not supported by the Debtors' books and records.

18. Further, the Trust requests that the Court waive the limitations of Bankruptcy Rule 3007(c) as it relates to this Motion. As detailed in the Memorandum of Law accompanying this Motion, certain of the bases for objection contained in the Motion fall into one or more of the categories permitted by Bankruptcy Rule 3007(d) to be joined in an omnibus objection, while others do not. However, in an effort to streamline the claims resolution procedure, the Trust will provide personalized notice (each, a "Personalized Notice") to each of the creditors holding the Disputed Claims in lieu of filing a separate objection to each Disputed Claim, and request authority to object to all the Disputed Claims for each of the asserted grounds in this Motion.

19. Specifically, each Personalized Notice prominently features the claimant's name, applicable claim number(s), the basis for objection, the proposed treatment of the relevant claim,

and does not include other claimant's information. Additionally, each Personalized Notice identifies the hearing date, a response deadline, and response procedures. Thus, claimants can easily identify the proposed treatment of their claim(s) and the procedures they need to follow if they wish to file a response with the Court. Accordingly, the Trust satisfies the applicable notice requirements of the Bankruptcy Code and Bankruptcy Rules, including Bankruptcy Rule 3007.

20. To the extent the Court does not so authorize the Trust, the Trust reserves the right to object to each of the Disputed Claims individually.

21. Unless the individual creditors holding each of the Disputed Claims respond to this Motion, the Court may disallow the Disputed Claims in their entirety.

22. The Liquidating Trustee views this Motion as a "housekeeping" matter required by the rules of procedure to ensure that the allowed Disputed Claims reflect the amounts that the Debtors' estate owes.

23. The rights of the Trust and the Liquidating Trustee to: (i) file subsequent objections to any of the Disputed Claims on any ground (whether substantive or non-substantive); (ii) amend, modify or supplement the Motion, including, without limitation, filing objections to amended or newly filed Disputed Claims; (iii) seek to expunge or reduce any Disputed Claim to the extent all or a portion of such Disputed Claim has been paid; and (iv) settle any Disputed Claim for less than the asserted amount, are expressly preserved.

24. To the extent that any portion of any of the Disputed Claims are also the subject of a separate claim objection on other grounds, whether by separate motion or through an adversary proceeding, the Liquidating Trustee requests that any order on this Motion not affect, eliminate, or determine those separate objections.

25. Pursuant to Local Rule 9013-2(a), this Motion is verified and is accompanied by a memorandum, proposed order, and proof of service.

26. As set forth above, parties in interest are afforded the opportunity to file a response (each, a “Response”) to the relief requested in the Motion, as required by Local Rule 9013-2(b).

27. Pursuant to Local Rule 9013-2(c), the Liquidating Trustee gives notice that if an evidentiary hearing is held, it may, if necessary, call James Carr or James Hunt of META Advisors LLC, whose business address is 101 Park Avenue, 30th Floor, New York, New York 10178, Dana P. Kane, of Kelley Drye & Warren LLP, whose business address is 101 Park Avenue, New York, New York 10178, and/or Matthew Diaz from FTI Consulting, Inc., whose business address is Three Times Square, 9th Floor, New York, New York 10036, to testify as to the Debtors’ books and records. The Liquidating Trustee reserves the right to supplement its witness list to add additional witnesses or to expand the scope of expected testimony of identified witnesses prior to any evidentiary hearing.

CONCLUSION

The Liquidating Trustee respectfully requests that the Court enter an order holding the Disputed Claims, as improperly filed, are not entitled to be treated as prima facie evidence of validity, and disallowing such claims.

Dated: April 9, 2019

Respectfully Submitted,

LOWENSTEIN SANDLER LLP

/e/ Scott Cargill

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Counsel for the Gander Mountain

Liquidating Trustee

VERIFICATION

I, James Hunt, on behalf of META Advisors LLC, not individually, but solely in its capacity as liquidating trustee for the Gander Mountain Liquidating Trust, have reviewed the Motion and declare, based upon (i) my personal knowledge, (ii) my review (or the review of persons under my supervision) of the books and records provided to me by the Debtors' former employees and/or the Trust's consultants, the Schedules and Statements filed in these Cases, the relevant proofs of claim, and the claims register, as well as relevant documents and other information prepared or collected by the Debtors' employees or professionals and/or the Trust's consultants and professionals, and/or (iii) my opinion based on my experience with the Debtors' operations and financial condition, that the facts set forth in the preceding Motion are true and correct to the best of my knowledge, information and belief.

Dated: April 9, 2019

By: 

**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

**MEMORANDUM OF LAW IN SUPPORT OF THE LIQUIDATING TRUSTEE'S
SIXTEENTH OMNIBUS MOTION OBJECTING TO CERTAIN EMPLOYEE CLAIMS
FOR INSUFFICIENT SUPPORTING DOCUMENTATION**

The Liquidating Trustee objects to the claims identified in Paragraph 13 of the Liquidating Trustee's Sixteenth Omnibus Motion Objecting to Certain Employee Claims for Insufficient Supporting Documentation ("Disputed Claims"), and requests that this Court enter an order holding the Disputed Claims, as improperly filed, are not entitled to be treated as prima facie evidence of validity, and disallowing such Disputed Claims.

BACKGROUND

The facts in support of the relief requested are set forth in the verified Motion. All capitalized terms have the meaning ascribed to them in the Motion.

ARGUMENT

In general, the evidentiary effect of a proof of claim properly filed in accordance with applicable Bankruptcy Rules constitutes "prima facie evidence of the validity and amount of the claim." Fed. R. Bankr. P. 3001(f). The burden "then shifts to the objector to establish that the claim fits within one of the exceptions set forth in [§] 502(b)." *In re Dove-Nation*, 318 B.R. 147, 152 (B.A.P. 8th Cir. 2004). However, when submitted in a form that does not comply with applicable

Bankruptcy Rules, a proof of claim does not constitute prima facie evidence of the validity of the claim amount, and therefore the burden remains on the creditor to prove the claim is valid. *AFY v. N. Plains Feeders, Inc.*, 482 B.R. 830, 839–40 (D. Neb. 2012) (quoting *In re Porter*, 374 B.R. 471, 483 (Bankr. D. Conn. 2007); *Caplan v. B-Line (In re Kirkland)*, 572 F.3d 838, 840–41 (10th Cir. 2009); see *PNY Techs. Inc. v. Polaroid Corp. (In re Polaroid Corp.)*, 2017 U.S. Dist. LEXIS 47749, *13 (D. Minn. 2017) see also *In re Duke and King Acquisition Corp.*, No. 10-38652 (Bankr. D. Minn. Jul. 2, 2012) (granting order of liquidating trust’s objections based upon lack of adequate supporting documentation). If the claimant fails to identify any evidence supporting its claim following objection, the proof of claim may properly be denied in its entirety. *AFY*, 374 B.R. at 845; see also *In re Duke and King Acquisition Corp.*, No. 10-38652 (Bankr. D. Minn. Jul. 2, 2012).

Bankruptcy Rule 3001(a) requires that a filed proof of claim must “conform substantially to the appropriate Official Form.” Fed. R. Bankr. P. 3001(a). The appropriate Official Form is Official Form 410, which requires the claimant “[a]ttach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements.” Fed. R. Bankr. P. Official Form 410. If such documents are not available, the claimant must explain as much in an attachment to the proof of claim. *Id.* If a proof of claim is submitted that does not conform substantially to Official Form 410 and its requirements, the proof of claims does not comply with Bankruptcy Rule 3001(a). See Fed. R. Bankr. P. 3001(a).

The Liquidating Trustee objects to the Disputed Claims on the basis that the Disputed Claims do not substantially comply with Official Form 410, as required by Bankruptcy Rule 3001(a), and therefore are not entitled to a presumption of prima facie validity. The manner in which the Disputed Claims fail to conform to the applicable Bankruptcy Rules is that the Disputed

Claims are each supported by insufficient documentation as evidence of the Disputed Claims. Without sufficient supporting documentation, the Liquidating Trustee is unable to determine the validity of the Disputed Claims. Therefore, without a presumption of prima facie validity, the creditors holding the Disputed Claims must offer some additional evidence to survive an objection. Unless the creditors holding the Disputed Claims respond to this Motion by offering such evidence, the claimants have not met their burden and the Disputed Claims should be disallowed entirely.

Furthermore, the Liquidating Trustee and its professionals have reviewed the Debtors' books and records and have concluded that no amounts are owed on account of the Disputed Claims.

Accordingly, the Liquidating Trustee (1) objects to the Disputed Claims as being submitted in a form not in compliance with applicable bankruptcy rules; (2) objects to the Disputed Claims as not supported by the Debtors' books and records; and (3) requests entry of an order holding the Disputed Claims, as improperly filed, are not entitled to be treated as prima facie evidence of validity, and disallowing such claims.

PERSONALIZED NOTICES

In addition to serving the Motion on certain core notice parties, the Trust will serve personalized notice (the "Personalized Notice") to each claimant with a Disputed Claim included in this Motion. Each Personalized Notice prominently features the claimant's name, applicable claim number(s), the basis for objection, the proposed treatment of the relevant claim, and does not include other claimant's information. Additionally, each Personalized Notice identifies the hearing date, a response deadline, and response procedures. Thus, claimants can easily identify the proposed treatment of their claim(s) and the procedures they need to follow if they wish to file a response with the Court.

Specifically, the cover pages of each of the notices to the Motion contain the exact basis for the Trust’s objection found in the Motion in a bolded box at the center of the page, examples of which are as follows:

[Claimant Name]			
PERSONALIZED NOTICE OF LIQUIDATING TRUSTEE’S SIXTEENTH OMNIBUS MOTION OBJECTING TO CERTAIN EMPLOYEE CLAIMS FOR INSUFFICIENT SUPPORTING DOCUMENTATION			
	<u>Claim Number</u>	<u>Claimed Amount</u>	<u>Modified Amount</u>
Claim to be Expunged:			
Basis for Objection: Insufficient Supporting Documentation / Not Supported by Books and Records			

REQUEST FOR WAIVER PURSUANT TO RULE 3007(c)

In light of the Personalized Notice set forth above and in the interest of judicial economy and efficiency, the Trust requests that the Court waive the limitations of Bankruptcy Rule 3007(c) as it relates to this Motion.

Bankruptcy Rule 3007(c) permits debtors to join multiple claims in a single objection only if “otherwise ordered by the court or permitted by subdivision (d) . . .” Fed. R. Bankr. P. 3007(c). The advisory committee note to this Bankruptcy Rule states that the restrictions on this practice of filing omnibus objections to numerous claims are intended to “ensure the protection of the due process rights of the claimant.” Fed. R. Bankr. P. 3007, Advisory Committee Note – 2007 Amendment. Bankruptcy Rule 3007(d) allows omnibus objections if the objections fall into one or more of eight different categories, including that they were presented in a form that does not comply with applicable rules, and the objector is unable to determine the validity of the claim because of the noncompliance. Fed. R. Bankr. P. 3007(d).

Although certain of the bases for objection contained in this Motion fall into one or more of the categories permitted by Bankruptcy Rule 3007(d), others do not. However, for the reasons set forth below, the Court should permit the Trust to include all of the Disputed Claims in an omnibus objection.

First, requiring the Trust to file individual objections to each of the Disputed Claims contained in the Motion would place an undue burden and expense on the Trust to the detriment of all creditors. Allowing the Trust to file one omnibus objection to the Disputed Claims will streamline the claims resolution procedure in the most cost effective manner available, and thus provide much needed savings to the estates and aid in the effort to reach administrative solvency.

Moreover, the Personalized Notice given by the Trust to each of the parties asserting the Disputed Claims ensure that the due process rights of those parties are protected. As noted above, the Personalized Notices allow claimants to easily identify the proposed treatment of their claim(s) and the procedures they need to follow if they wish to file a response with the Court. Accordingly, the due process rights of the claimants are protected. Forcing the Trust to file individual objections to each of the Disputed Claims will not materially enhance that protection.

Additionally, the Trust has complied with the relevant provisions of Bankruptcy Rule 3007(e) with respect to the format of omnibus objections. The Trust has (i) listed the claimant's name, claim number and basis for objection on each Personalized Notice; (ii) listed claimants alphabetically, and categorized claims in the Motion; (iii) stated the grounds for each objection; (iv) included the identity of the objector and the grounds for objection in the title of the Motion; and (v) included substantially less than 100 claims in the Motion.

Accordingly, in the interest of judicial economy and efficiency, the Trust requests authority to object to all of the Disputed Claims for all stated grounds in this Motion. To the extent the

Court does not so authorize the Trust, the Trust reserves the right to object to each of the Disputed Claims individually.

CONCLUSION

The Liquidating Trustee respectfully requests that the Court enter an order (1) holding the Disputed Claims, as improperly filed and not supported by the Debtors' books and records, are not entitled to be treated as prima facie evidence of validity and disallowing such claims; and (2) allowing such other and further relief as is just and equitable.

Dated: April 9, 2019

Respectfully Submitted,

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Liquidating Trustee

**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

**ORDER GRANTING THE LIQUIDATING TRUSTEE'S
SIXTEENTH OMNIBUS MOTION OBJECTING TO CERTAIN EMPLOYEE CLAIMS
FOR INSUFFICIENT SUPPORTING DOCUMENTATION**

This matter is before the Court on the Gander Mountain Liquidating Trust ("Trust") and META Advisors LLC, in its capacity as the liquidating trustee ("Liquidating Trustee")'s Motion ("Motion") Objecting to Certain Employee Claims for Insufficient Supporting Documentation. Based on the Motion and the documents of record herein,

IT IS ORDERED:

1. The Motion is granted.
2. Pursuant to Bankruptcy Rule 3007(c), the Trust is authorized to include the Disputed Claims in an omnibus objection.
3. The claims identified in Paragraph 4 of this Order, being submitted without sufficient documentation and thus in a form that does not comply with applicable bankruptcy rules, are not entitled to prima facie validity as to the amount claimed.
4. The following claims are hereby disallowed and expunged in their entirety:

Claimant	Claim Number	Claim Date	Asserted Priority	Claim Amount
Mark Beresford	8280-1	6/12/17	Priority Pursuant to § 507(a)(4)	\$3,590.50

Derek Siddons	6194-1	6/8/17	General Unsecured	\$150,050.00
Derek Siddons	6194-1	6/8/17	Priority Pursuant to § 507(a)(4)	\$12,475.00
Dustin Sumner	17391-1	7/17/17	Priority Pursuant to § 507(a)(4)	\$2,000.00
Chanese Thomas	114-1	3/27/17	General Unsecured	\$0.00
David Varrett	18238-1	7/12/17	Priority Pursuant to § 507(a)(4)	\$5,514.54
Laura Walleen	145-1	3/29/17	Priority Pursuant to § 507(a)(4)	\$17,653.00

5. The rights of the Trust and the Liquidating Trustee to: (i) file subsequent objections to any of the claims on any ground (substantive or non-substantive); (ii) amend, modify or supplement the Motion, including, without limitation, filing objections to 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 claims on any other grounds are preserved.

6. To the extent that the 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.

7. 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.

8. 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.

9. 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.

10. 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