

**Hearing Date and Time: January 24, 2012 at 10:00 a.m.**  
**Response Deadline: January 17, 2012 at 4:00 p.m.**

ARNOLD & PORTER LLP  
399 Park Avenue  
New York, New York 10022-4690  
Telephone: (212) 715-1000  
Facsimile: (212) 715-1399  
Michael J. Canning  
Rosa J. Evergreen

*Counsel for the Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

Quebecor World (USA) Inc., et al.,

Debtors.

Chapter 11

Case No. 08-10152 (JMP)  
Jointly Administered

Honorable James M. Peck

**REORGANIZED DEBTORS' SEVENTIETH OMNIBUS OBJECTION TO CLAIMS  
(SEEKING TO EXPUNGE CERTAIN NO LIABILITY CLAIMS)**

Quebecor World (USA) Inc. and 52 of its domestic direct and indirect subsidiaries, as reorganized debtors (collectively, the "Debtors" or "Reorganized Debtors", as applicable), hereby file their Seventieth Omnibus Objection to Claims (Seeking to Expunge Certain No Liability Claims) (the "Objection").

**PARTIES RECEIVING THIS OBJECTION SHOULD CONSULT EXHIBITS B, C  
AND D (COLLECTIVELY, THE "EXHIBITS") TO DETERMINE WHETHER THEIR  
NAMES AND RESPECTIVE CLAIMS ARE IDENTIFIED ON ANY OF THE EXHIBITS.**

The Reorganized Debtors hereby move this Court for the entry of an order substantially in the form of Exhibit A attached hereto, granting the relief sought by this Objection. In support of this Objection, the Reorganized Debtors respectfully represent as follows:

### **Jurisdiction**

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).
2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.
3. The statutory predicates for the relief requested herein are sections 105, 502 and 503 of title 11 of the United States Bankruptcy Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), and Rule 3007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”).

### **Background**

4. On January 21, 2008 (the “Petition Date”), the 53 Debtors filed their voluntary petitions for relief (the “Chapter 11 Cases”) under chapter 11 of title 11 of the Bankruptcy Code.
5. On January 20, 2008 the Debtors’ corporate parent, Quebecor World Inc. (“QWI”) together with each of the Debtors commenced a proceeding before the Quebec Superior Court, Commercial Division, for the Judicial District of Montreal (the “Canadian Court”) for a plan of compromise or arrangement (the “Canadian Proceeding”) under the Canadian Companies’ Creditors Arrangement Act (“CCAA”).<sup>1</sup> Each of the Debtors was joined in the Canadian Proceeding in order that each Debtor could obtain the protection of a stay under the CCAA as well as under the Bankruptcy Code.
6. On January 23, 2008 Donlin, Recano & Company, Inc. was appointed as the Claims Agent in these Chapter 11 Cases (the “Claims Agent”).

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<sup>1</sup> The Canadian Court appointed Ernst & Young, Inc. to serve as Monitor for the Canadian Proceeding, and UBS Investment Bank was retained by QWI as a financial advisor in connection with the Canadian Proceeding.

7. On January 31, 2008, an Official Committee of Unsecured Creditors (the “Creditors’ Committee”) was appointed, and amended on February 8, 2008.
8. On or about June 18, 2008, the Debtors filed their respective schedules of assets and liabilities (collectively, the “Schedules”).
9. By an order entered on September 30, 2008 (Docket No. 1175) (the “Bar Date Order”), the Court established December 5, 2008 as the general bar date for creditors to file proofs of claim, including, among others, section 503(b)(9) claims (the “Bar Date”). Shortly after the entry of the Bar Date Order, a notice of the Bar Dates (the “Bar Date Notice”) was served on all known creditors and potential creditors in accordance with the requirements of the Bar Date Order. Over 110,000 copies of the Bar Date Notice were mailed to such known creditors and potential creditors. Additionally, the Bar Date Notice was published on or about November 3, 2008 in the national editions of *The New York Times* and *The Wall Street Journal*.
10. In response to the mailing and publication of the Bar Date Notice, approximately 10,000 proofs of claim have been filed in these Chapter 11 Cases.
11. On May 18, 2009, the Debtors filed their Third Amended Joint Plan of Reorganization (Docket No. 1662). On July 2, 2009, the Court entered an order confirming the Debtors’ Third Amended Joint Plan of Reorganization, as modified (the “Plan”). See Findings of Fact, Conclusions of Law and Order Confirming Third Amended Joint Plan of Reorganization of Quebecor World (USA) Inc. and Certain Affiliated Debtors and Debtors-In-Possession (Docket No. 1802) (the “Confirmation Order”).
12. The Plan became effective on July 21, 2009 (the “Effective Date”).
13. Pursuant to the Plan, on the Effective Date, a Joint Claims Oversight Committee, as defined and provided for in the Plan, was formed.

14. In connection with the Debtors' emergence from these Chapter 11 Cases, Quebecor World (USA) Inc. changed its name to World Color (USA) Corp. and each of the affiliated Debtors changed its name to adopt the "World Color" name instead of the "Quebecor" or "Quebecor World" name, and, similarly, Quebecor World Inc. changed its name to World Color Press Inc. Further, on July 2, 2010, World Color Press Inc. was acquired by Quad/Graphics, Inc. Nevertheless, pursuant to section 6.4(c) of the Plan, the Reorganized Debtors retained their "Quebecor" names for purposes of these Chapter 11 Cases in all respects.

15. On November 5, 2009, this Court entered an Order Authorizing the (a) Establishment of Claims Allowance, Objection, Claims Resolution and Settlement Procedures and (b) Extension of the 503(b)(9)/Reclamation Claims Objection Deadline (Docket No. 1978) (the "Claims Procedures Order"), which approved certain detailed procedures for the allowance of claims, and for the filing and prosecution of objections to claims filed or scheduled in these Chapter 11 Cases, as more fully set forth in Appendix 1 to the Claims Procedures Order (the "Claims Procedures").

#### **Relief Requested**

16. Pursuant to the Claims Procedures, the Reorganized Debtors hereby seek entry of an order disallowing and expunging the claims identified on the Exhibits, as these claims, as applicable (i) to the extent valid, have been previously paid, resolved, or satisfied by the Debtors, (ii) are not valid liabilities of the Debtors, as such claims are liabilities, if at all, against non-filing Quebecor entities or unrelated entities or persons; or (iii) are not reflected on the Debtors' books and records as valid claims against the Debtors' estates and the Reorganized Debtors dispute any liability for such claims.

**Basis For Relief Requested**

17. The Reorganized Debtors have reviewed their books and records in connection with the proofs of claim identified on Exhibit B, and have determined that such claims, to the extent valid, have previously been paid, resolved or otherwise satisfied by the Debtors prior to the Petition Date, or pursuant to orders of the Court, or duplicate claims that have been resolved, or were, in fact, post-petition obligations of the Debtors that have been paid in the ordinary course (collectively, the “Satisfied Claims”).

18. The Reorganized Debtors have reviewed their books and records in respect of the proofs of claim identified on Exhibit C, and have determined that such claims, as asserted by the holders thereof, are, in fact, claims against either a non-debtor Quebecor entity or an unrelated person or entity (the “Non-Debtor Claims”).

19. The Reorganized Debtors have reviewed their books and records with respect to the proofs of claim identified on Exhibit D, and have determined that such claims, as asserted by the holders thereof, are not valid claims against the Debtors’ estates and the Reorganized Debtors dispute any liability for such claims, and therefore, such holders are not entitled to recovery on account of such claims under the Plan (the “No Liability Claims”).

20. As the Debtors have no liability for any of the Satisfied Claims, the Non-Debtor Claims, or the No Liability Claims, the Reorganized Debtors request that such claims, in each case as identified on the applicable Exhibit, be disallowed and expunged. Failure to disallow these proofs of claim will result in the applicable claimants receiving an unwarranted recovery against the Debtors’ estates, to the detriment of valid creditors in these Chapter 11 Cases.

21. For the foregoing reasons, the Reorganized Debtors request that the claims set forth on each of the Exhibits be disallowed and expunged in their entirety, all pursuant to section 502 of the Bankruptcy Code.

**Reservation of Rights**

22. At this time, the Reorganized Debtors have not completed their review of the validity of all claims and demands filed against their estates, and, accordingly, reserve their right to object to any and all claims, whether or not they are included in this Objection.

23. The Reorganized Debtors also expressly reserve the right to object further to each of the Satisfied Claims, the Non-Debtor Claims, and the No Liability Claims, to the extent not disallowed and expunged, on any and all additional factual or legal grounds. Without limiting the generality of the foregoing, the Reorganized Debtors specifically reserve the right to amend this Objection, file additional papers in support of this Objection or take other appropriate actions, all as more fully set forth in the Claims Procedures.

**Notice**

24. Pursuant to the Claims Procedures, notice of this Objection has been provided to all claimants with claims that are subject to this Objection, as identified on each of Exhibit B, Exhibit C, and Exhibit D attached hereto, and to the parties on the Notice List (as such term is defined in the Case Management Order). The Reorganized Debtors submit that no other or further notice need be provided.

WHEREFORE the Reorganized Debtors respectfully request the Court enter an order, substantially in the form attached hereto as Exhibit A, (i) sustaining this Objection and disallowing and expunging the Satisfied Claims, the Non-Debtor Claims and the No Liability Claims, in each case as set forth on the Exhibits, in their entirety and (ii) granting such other and further relief as is just and proper.

Dated: New York, New York  
December 22, 2011

Respectfully submitted,

/s/ Michael J. Canning\_\_\_\_\_

Michael J. Canning

Rosa J. Evergreen

ARNOLD & PORTER LLP

399 Park Avenue

New York, New York 10022-4690

Telephone: (212) 715-1000

Facsimile: (212) 715-1399

*Counsel for the Reorganized Debtors*

**EXHIBIT A**



**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

Quebecor World (USA) Inc., et al.,

Debtors.

Chapter 11

Case No. 08-10152 (JMP)  
Jointly Administered

Honorable James M. Peck

**ORDER SUSTAINING THE REORGANIZED DEBTORS' SEVENTIETH OMNIBUS  
OBJECTION TO CLAIMS (SEEKING TO EXPUNGE CERTAIN  
NO LIABILITY CLAIMS)**

This matter coming before the Court on the Reorganized Debtors' Seventieth Omnibus Objection to Claims (Seeking to Expunge Certain No Liability Claims) (the "Objection")<sup>1</sup>; it appearing that the relief requested in the Objection is in the best interests of the Reorganized Debtors' estates, their creditors and other parties in interest; the Court having found that (a) it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, (b) this proceeding is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), (c) venue of this proceeding is proper pursuant to 28 U.S.C. §§ 1408 and 1409, and (d) notice of the Objection was provided to all necessary and appropriate parties; and the Court having determined that the legal and factual bases set forth in the Objection establish grounds for the relief granted herein;

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED.

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<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Objection.

2. Each of the claims identified on Exhibit B, Exhibit C, and Exhibit D, attached hereto and incorporated herein by reference is disallowed and expunged in its entirety, pursuant to section 502 of the Bankruptcy Code.

3. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

4. The Reorganized Debtors and their Claims Agent are authorized to take all such actions as are necessary or appropriate to implement the terms of this Order.

5. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: \_\_\_\_\_, 2012

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United States Bankruptcy Judge

**EXHIBIT B**

Quebecor World Inc., et al.  
 Reorganized Debtors' Seventieth Omnibus Objection to Claims  
 (Seeking to Expunge Certain No Liability Claims )

## Exhibit B

NAME/ADDRESS OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION	CASE NUMBER	CLAIM AMOUNT (\$)
Cred. # 945 HB3 INC ATTN: ISABEL R. HARRIS, PRESIDENT 20151 GILBERT RD SUITE C5 BIG RAPIDS, MI 49307	796	UNSECURED	08-10152	\$8,817.38
Cred. # 1655 IL- DEPARTMENT OF REVENUE C/O BANKRUPTCY UNIT ATTN: RICHARD VEIN, REVENUE TAX SPECIALIST 100 W. RANDOLPH STREET, #7-400 CHICAGO, IL 60601	9366	ADMINISTRATIVE	08-10152	\$4,708.47
Cred. # 1056 KEY CONTAINER CORP ATTN: DOMENIC LAPATI, CONTROLLER 21 CAMPBELL STREET PO BOX 2370 PAWTUCKET, RI 02861	8811	UNSECURED	08-10152	\$1,697.73
Cred. # 69871 MD- COMPTROLLER OF TREASURY ATTN: MARY T. CARR, REVENUE SPECIALIST STATE OFFICE BUILDING 301 WEST PRESTON STREET ROOM 409 BALTIMORE, MD 21201	3381.01	PRIORITY	08-10152	\$37,422.00
Cred. # 69871 MD- COMPTROLLER OF TREASURY ATTN: MARY T. CARR, REVENUE SPECIALIST STATE OFFICE BUILDING 301 WEST PRESTON STREET ROOM 409 BALTIMORE, MD 21201	3381.02	UNSECURED	08-10152	\$8,206.00
Cred. # 5990 MS- STATE TAX COMMISSION C/O BANKRUPTCY SECTION ATTN: BRENDA T. CARTER P.O. BOX 22808 JACKSON, MS 39225-2808	6174.01	UNSECURED	08-10202	\$82.00
Cred. # 5990 MS- STATE TAX COMMISSION C/O BANKRUPTCY SECTION ATTN: BRENDA T. CARTER P.O. BOX 22808 JACKSON, MS 39225-2808	6174.02	PRIORITY	08-10202	\$610.00
Cred. # 5990 MS- STATE TAX COMMISSION C/O BANKRUPTCY SECTION ATTN: BRENDA T. CARTER P.O. BOX 22808 JACKSON, MS 39225-2808	6176.01	UNSECURED	08-10169	\$252.00
Cred. # 5990 MS- STATE TAX COMMISSION C/O BANKRUPTCY SECTION ATTN: BRENDA T. CARTER P.O. BOX 22808 JACKSON, MS 39225-2808	6176.02	PRIORITY	08-10169	\$3,376.00
Cred. # 69867 NY- DEPARTMENT OF LABOR C/O UNEMPLOYMENT INSURANCE DIVISION ATTN: LISA PEARSON, TAX COMPLIANCE AGENT GOVERNER W. AVERELL HARRIMAN STATE OFFICE BUILDING CAMPUS, BLDG 12, RM 256 ALBANY, NY 12240	2351	ADMINISTRATIVE	08-10152	\$975.49

Reorganized Debtors' Seventieth Omnibus Objection to Claims  
 (Seeking to Expunge Certain No Liability Claims )

## Exhibit B

NAME/ADDRESS OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION	CASE NUMBER	CLAIM AMOUNT (\$)
Cred. # 69867 NY- DEPARTMENT OF LABOR C/O UNEMPLOYMENT INSURANCE DIVISION ATTN: LISA PEARSON, TAX COMPLIANCE AGENT GOVERNER W. AVERELL HARRIMAN STATE OFFICE BUILDING CAMPUS, BLDG 12, RM 256 ALBANY, NY 12240	3314	PRIORITY	08-10182	\$1,570.24
Cred. # 69875 OH- REGIONAL INCOME TAX AGENCY C/O LEGAL DEPT ATTN: J. CAMISKA PO BOX 470537 BROADVIEW HEIGHTS, OH 44147	3447	PRIORITY	08-10152	\$540.99
Cred. # 33024 OK- OKLAHOMA EMPLOYMENT SECURITY COMMISSION ATTN: OESC- LEGAL DEPT. P.O. BOX 53039 OKLAHOMA CITY, OK 73152	1956	PRIORITY	08-10152	\$63.97

**Total Claim Count: 13**

**Total Claim Amount: \$68,322.27**

**EXHIBIT C**

Reorganized Debtors' Seventieth Omnibus Objection to Claims  
(Seeking to Expunge Certain No Liability Claims)

Exhibit C

NAME/ADDRESS OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION	CASE NUMBER	CLAIM AMOUNT (\$)
Cred. # 4892 TN- FRANCES HARRELL, TRUSTEE SULLIVAN COUNTY P.O. BOX 550 BLOUNTVILLE, TN 37617	37	PRIORITY	08-10152	\$127,382.00

**Total Claim Count: 1**

**Total Claim Amount: \$127,382.00**

**EXHIBIT D**



Reorganized Debtors' Seventieth Omnibus Objection to Claims  
(Seeking to Expunge Certain No Liability Claims)

## Exhibit D

NAME/ADDRESS OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION	CASE NUMBER	CLAIM AMOUNT (\$)
Cred. # 5887 CA- EMPLOYMENT DEVELOPMENT DEPARTMENT C/O BANKRUPTCY GROUP MIC 92E ATTN: E. OKUSU, TAX COMPLIANCE SUPERVISOR P.O. BOX 826880 SACRAMENTO, CA 94280-0001	1126.01	UNSECURED	08-10202	\$2,593.13
Cred. # 5887 CA- EMPLOYMENT DEVELOPMENT DEPARTMENT C/O BANKRUPTCY GROUP MIC 92E ATTN: E. OKUSU, TAX COMPLIANCE SUPERVISOR P.O. BOX 826880 SACRAMENTO, CA 94280-0001	1126.02	PRIORITY	08-10202	\$270.74
Cred. # 71246 CA- EMPLOYMENT DEVELOPMENT DEPARTMENT C/O SPECIAL PROCEDURES SECTIONS ATTN: KAREN FICKERT, TAX COMPLIANCE SPVR. P.O. 826880, MIC 92E SACRAMENTO, CA 94280-0001	9351	ADMINISTRATIVE	08-10152	\$5,701.22
Cred. # 71304 CA- EMPLOYMENT DEVELOPMENT DEPARTMENT C/O SPECIAL PROCEDURES SECTION ATTN: K. FICKERT, TAX ADMINISTRATOR P.O. BOX 826880, MIC 92E SACRAMENTO, CA 94280-0001	9368	ADMINISTRATIVE	08-10162	\$2,718.42
Cred. # 5857 GA- DEPARTMENT OF REVENUE C/O COMPLIANCE DIVISION ATTN: BANKRUPTCY SECTION P.O. BOX 161108 ATLANTA, GA 30321	1230.01	UNSECURED	08-10169	\$4,141.71
Cred. # 5857 GA- DEPARTMENT OF REVENUE C/O COMPLIANCE DIVISION ATTN: BANKRUPTCY SECTION P.O. BOX 161108 ATLANTA, GA 30321	1230.02	PRIORITY	08-10169	\$21,745.82
Cred. # 5857 GA- DEPARTMENT OF REVENUE C/O COMPLIANCE DIVISION ATTN: BANKRUPTCY SECTION P.O. BOX 161108 ATLANTA, GA 30321	1370.01	UNSECURED	08-10202	\$1,638.08
Cred. # 5857 GA- DEPARTMENT OF REVENUE C/O COMPLIANCE DIVISION ATTN: BANKRUPTCY SECTION P.O. BOX 161108 ATLANTA, GA 30321	1370.02	PRIORITY	08-10202	\$6,817.48
Cred. # 5857 GA- DEPARTMENT OF REVENUE C/O COMPLIANCE DIVISION ATTN: BANKRUPTCY SECTION P.O. BOX 161108 ATLANTA, GA 30321	1372.01	UNSECURED	08-10193	\$851.53
Cred. # 445 GRAFIKAMERICA INC ATTN: MATTHEW BOWMAN, CONTROLLER 1285 WEST KING STREET PO BOX 2771 YORK, PA 17405	7726	UNSECURED	08-10201	UNKNOWN
Cred. # 70590 GRAPHIC COMMUNICATIONS (LOCAL 527-M) CONFERENCE OF THE INT'L BROTHERHOOD OF TEAMSTERS, LOCAL 527-M P.O. BOX 2481 JONESBORO, GA 72402	8540	PRIORITY	08-10193	UNKNOWN

Reorganized Debtors' Seventieth Omnibus Objection to Claims  
(Seeking to Expunge Certain No Liability Claims)

Exhibit D

NAME/ADDRESS OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION	CASE NUMBER	CLAIM AMOUNT (\$)
Cred. # 69690 IL- DEPARTMENT OF REVENUE ATTN: RICHARD VEIN, REVENUE TAX SPEC. 100 W. RANDOLPH ST., #7-400 CHICAGO, IL 60601	2350	PRIORITY	08-10192	\$99.20
Cred. # 69277 IL- DEPT. OF EMPLOYMENT SECURITY C/O ATTORNEY GENERAL SECTION 33 SOUTH STATE STREET, 9TH FLOOR CHICAGO, IL 60603	2215.01	SECURED	08-10202	\$2,198.52
Cred. # 69277 IL- DEPT. OF EMPLOYMENT SECURITY C/O ATTORNEY GENERAL SECTION 33 SOUTH STATE STREET, 9TH FLOOR CHICAGO, IL 60603	2215.02	PRIORITY	08-10202	\$13,125.90
Cred. # 5767 MA - DEPARTMENT OF REVENUE ATTN: STEPHEN KOBIALKA, TAX SUPERVISOR P.O. BOX 9564 BOSTON, MA 02114-9564	9258.01	UNSECURED	08-10169	\$314.43
Cred. # 5767 MA - DEPARTMENT OF REVENUE ATTN: STEPHEN KOBIALKA, TAX SUPERVISOR P.O. BOX 9564 BOSTON, MA 02114-9564	9258.02	PRIORITY	08-10169	\$3,091.53
Cred. # 27797 MEMBERS OF BARGAINING UNIT DISTRICT COUNCIL 3, GCC, IBT ATTN: ISRAEL CASTRO 659 SOUTH 8TH STREET LOUISVILLE, KY 40203	5058	PRIORITY	08-10177	UNKNOWN
Cred. # 5328 MO- DEPARTMENT OF REVENUE ATTN: DEB BUSCHMAN, AGENT P.O. BOX 475 JEFFERSON CITY, MO 65105	8609	ADMINISTRATIVE	08-10152	\$42,574.70
Cred. # 5908 NJ- DEPARTMENT OF LABOR AND WORKFORCE DEVELOPMENT, DIVISION OF EMPLOYER ACCOUNTS LEGAL PROCESSES P.O. BOX 379 TRENTON, NJ 08625-0379	1160.01	SECURED	08-10202	\$2.84
Cred. # 5908 NJ- DEPARTMENT OF LABOR AND WORKFORCE DEVELOPMENT, DIVISION OF EMPLOYER ACCOUNTS LEGAL PROCESSES P.O. BOX 379 TRENTON, NJ 08625-0379	1160.02	PRIORITY	08-10202	\$3,596.81
Cred. # 5946 NJ- DEPARTMENT OF TREASURY C/O DIVISION OF TAXATION ATTN: MICHAEL READING, AUTHORIZED AGENT P.O. BOX 245 TRENTON, NJ 08695-0245	1212	SECURED	08-10152	\$403.10
Cred. # 5946 NJ- DEPARTMENT OF TREASURY C/O DIVISION OF TAXATION ATTN: MICHAEL READING, AUTHORIZED AGENT P.O. BOX 245 TRENTON, NJ 08695-0245	1214	ADMINISTRATIVE	08-10152	\$5,000.00
Cred. # 5946 NJ- DEPARTMENT OF TREASURY C/O DIVISION OF TAXATION ATTN: MICHAEL READING, AUTHORIZED AGENT P.O. BOX 245 TRENTON, NJ 08695-0245	1215	UNSECURED	08-10152	\$170.24

Reorganized Debtors' Seventieth Omnibus Objection to Claims  
(Seeking to Expunge Certain No Liability Claims)

## Exhibit D

NAME/ADDRESS OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION	CASE NUMBER	CLAIM AMOUNT (\$)
Cred. # 5946 NJ- DEPARTMENT OF TREASURY C/O DIVISION OF TAXATION ATTN: MICHAEL READING, AUTHORIZED AGENT P.O. BOX 245 TRENTON, NJ 08695-0245	5830	PRIORITY	08-10197	\$600.00
Cred. # 5946 NJ- DEPARTMENT OF TREASURY C/O DIVISION OF TAXATION ATTN: MICHAEL READING, AUTHORIZED AGENT P.O. BOX 245 TRENTON, NJ 08695-0245	5831	PRIORITY	08-10152	\$76,590.31
Cred. # 5946 NJ- DEPARTMENT OF TREASURY C/O DIVISION OF TAXATION ATTN: MICHAEL READING, AUTHORIZED AGENT P.O. BOX 245 TRENTON, NJ 08695-0245	5834	ADMINISTRATIVE	08-10202	\$2,000.00
Cred. # 5946 NJ- DEPARTMENT OF TREASURY C/O DIVISION OF TAXATION ATTN: MICHAEL READING, AUTHORIZED AGENT P.O. BOX 245 TRENTON, NJ 08695-0245	5836	PRIORITY	08-10202	\$4,260.44
Cred. # 5890 NJ- DEPT. OF LABOR AND WORKFORCE DEVELOPMENT C/O DIVISION OF EMPLOYER ACCOUNTS ATTN: STANLEY DAVIS, CHIEF, CONTRIBUTORS SVC. P.O. BOX 379 TRENTON, NJ 08625-0379	9274.01	SECURED	08-10152	\$1,862.58
Cred. # 5890 NJ- DEPT. OF LABOR AND WORKFORCE DEVELOPMENT C/O DIVISION OF EMPLOYER ACCOUNTS ATTN: STANLEY DAVIS, CHIEF, CONTRIBUTORS SVC. P.O. BOX 379 TRENTON, NJ 08625-0379	9274.02	PRIORITY	08-10152	\$3,655.44
Cred. # 5890 NJ- DEPT. OF LABOR AND WORKFORCE DEVELOPMENT C/O DIVISION OF EMPLOYER ACCOUNTS ATTN: STANLEY DAVIS, CHIEF, CONTRIBUTORS SVC. P.O. BOX 379 TRENTON, NJ 08625-0379	9502	ADMINISTRATIVE	08-10202	\$1,483.70
Cred. # 5890 NJ- DEPT. OF LABOR AND WORKFORCE DEVELOPMENT C/O DIVISION OF EMPLOYER ACCOUNTS ATTN: STANLEY DAVIS, CHIEF, CONTRIBUTORS SVC. P.O. BOX 379 TRENTON, NJ 08625-0379	9503	ADMINISTRATIVE	08-10152	\$5,007.33
Cred. # 69867 NY- DEPARTMENT OF LABOR C/O UNEMPLOYMENT INSURANCE DIVISION ATTN: LISA PEARSON, TAX COMPLIANCE AGENT GOVERNOR W. AVERELL HARRIMAN STATE OFFICE BUILDING CAMPUS, BLDG 12, RM 256 ALBANY, NY 12240	2156	PRIORITY	08-10152	\$2,785.02
Cred. # 5399 NY- DEPT. OF TAXATION & FINANCE C/O BANKRUPTCY SECTION P.O. BOX 5300 ALBANY, NY 12205-0300	418	UNSECURED	08-10169	\$1,600.00

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(Seeking to Expunge Certain No Liability Claims)

## Exhibit D

NAME/ADDRESS OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION	CASE NUMBER	CLAIM AMOUNT (\$)
Cred. # 5399 NY- DEPT. OF TAXATION & FINANCE C/O BANKRUPTCY SECTION P.O. BOX 5300 ALBANY, NY 12205-0300	419	SECURED	08-10182	\$2,912.50
Cred. # 5399 NY- DEPT. OF TAXATION & FINANCE C/O BANKRUPTCY SECTION P.O. BOX 5300 ALBANY, NY 12205-0300	495.01	PRIORITY	08-10169	\$16,925.09
Cred. # 5399 NY- DEPT. OF TAXATION & FINANCE C/O BANKRUPTCY SECTION P.O. BOX 5300 ALBANY, NY 12205-0300	495.02	UNSECURED	08-10169	\$2,597.62
Cred. # 5399 NY- DEPT. OF TAXATION & FINANCE C/O BANKRUPTCY SECTION P.O. BOX 5300 ALBANY, NY 12205-0300	790	SECURED	08-10197	\$1,430.89
Cred. # 5399 NY- DEPT. OF TAXATION & FINANCE C/O BANKRUPTCY SECTION P.O. BOX 5300 ALBANY, NY 12205-0300	3958	ADMINISTRATIVE	08-10168	\$1,000.00
Cred. # 5399 NY- DEPT. OF TAXATION & FINANCE C/O BANKRUPTCY SECTION P.O. BOX 5300 ALBANY, NY 12205-0300	6010	SECURED	08-10197	\$1,430.89
Cred. # 5399 NY- DEPT. OF TAXATION & FINANCE C/O BANKRUPTCY SECTION P.O. BOX 5300 ALBANY, NY 12205-0300	6014	ADMINISTRATIVE	08-10160	\$19.02
Cred. # 5399 NY- DEPT. OF TAXATION & FINANCE C/O BANKRUPTCY SECTION P.O. BOX 5300 ALBANY, NY 12205-0300	6015.01	SECURED	08-10167	\$2,955.66
Cred. # 5399 NY- DEPT. OF TAXATION & FINANCE C/O BANKRUPTCY SECTION P.O. BOX 5300 ALBANY, NY 12205-0300	6015.02	PRIORITY	08-10167	\$267.84
Cred. # 5399 NY- DEPT. OF TAXATION & FINANCE C/O BANKRUPTCY SECTION P.O. BOX 5300 ALBANY, NY 12205-0300	6015.03	UNSECURED	08-10167	\$1,000.00
Cred. # 5399 NY- DEPT. OF TAXATION & FINANCE C/O BANKRUPTCY SECTION P.O. BOX 5300 ALBANY, NY 12205-0300	6016	ADMINISTRATIVE	08-10168	\$1,000.00
Cred. # 5399 NY- DEPT. OF TAXATION & FINANCE C/O BANKRUPTCY SECTION P.O. BOX 5300 ALBANY, NY 12205-0300	6017.01	PRIORITY	08-10169	\$16,925.09
Cred. # 5399 NY- DEPT. OF TAXATION & FINANCE C/O BANKRUPTCY SECTION P.O. BOX 5300 ALBANY, NY 12205-0300	6017.02	UNSECURED	08-10169	\$2,597.62
Cred. # 5399 NY- DEPT. OF TAXATION & FINANCE C/O BANKRUPTCY SECTION P.O. BOX 5300 ALBANY, NY 12205-0300	6018	SECURED	08-10182	\$2,912.50
Cred. # 5399 NY- DEPT. OF TAXATION & FINANCE C/O BANKRUPTCY SECTION P.O. BOX 5300 ALBANY, NY 12205-0300	6021.01	SECURED	08-10202	\$3,522.76

Reorganized Debtors' Seventieth Omnibus Objection to Claims  
(Seeking to Expunge Certain No Liability Claims)

Exhibit D

NAME/ADDRESS OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION	CASE NUMBER	CLAIM AMOUNT (\$)
Cred. # 5399 NY- DEPT. OF TAXATION & FINANCE C/O BANKRUPTCY SECTION P.O. BOX 5300 ALBANY, NY 12205-0300	6021.02	PRIORITY	08-10202	\$103.95
Cred. # 5399 NY- DEPT. OF TAXATION & FINANCE C/O BANKRUPTCY SECTION P.O. BOX 5300 ALBANY, NY 12205-0300	6021.03	UNSECURED	08-10202	\$1,000.00
Cred. # 5399 NY- DEPT. OF TAXATION & FINANCE C/O BANKRUPTCY SECTION P.O. BOX 5300 ALBANY, NY 12205-0300	9169.01	SECURED	08-10197	\$1,430.89
Cred. # 5392 OH- DEPARTMENT OF TAXATION C/O BANKRUPTCY DIVISION ATTN: REBECCA L. DAUM 30 E BROAD STREET, 23RD FL. COLUMBUS, OH 43215	406	PRIORITY	08-10152	\$1,385.07
Cred. # 5392 OH- DEPARTMENT OF TAXATION C/O BANKRUPTCY DIVISION ATTN: REBECCA L. DAUM 30 E BROAD STREET, 23RD FL. COLUMBUS, OH 43215	9463	ADMINISTRATIVE	08-10152	\$9,230.09
Cred. # 1960 ROSKAM AUTOMATIC MACHINERY, INC. ATTN: CAROLYNE SUE ROSKAM, VICE PRESIDENT PO BOX 1000 PINSON, AL 35126	5283	UNSECURED	08-10184	\$70.02
Cred. # 1960 ROSKAM AUTOMATIC MACHINERY, INC. ATTN: CAROLYNE SUE ROSKAM, VICE PRESIDENT PO BOX 1000 PINSON, AL 35126	5284	UNSECURED	08-10159	\$21,150.00
Cred. # 5284 VERIZON C/O BANKRUPTCY DEPARTMENT ATTN: BETTY HUDSON 3900 WASHINGTON STREET WILMINGTON, DE 19802	272	UNSECURED	08-10152	\$1,455.03
Cred. # 69688 VERIZON WIRELESS NORTHEAST ATTN: DIANE LEWIS, BANKRUPTCY ADMIN. P.O. BOX 3397 BLOOMINGTON, IL 61701	2343	UNSECURED	08-10152	\$9,463.74

**Total Claim Count: 57**

**Total Claim Amount: \$319,686.49**