

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:) Chapter 11
)
Wordsworth Academy, et al., 1) Case No. 17-14463 (AMC)
)
Debtors.) Jointly Administered
)

SUPPLEMENTAL AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
) ss:
COUNTY OF KINGS)

I, Sung Kim, declare:

- 1. I am over the age of 18 years and not a party to these chapter 11 cases.
2. I am employed by Donlin, Recano & Company, Inc., 6201 15th Avenue, Brooklyn, NY 11219.
3. On the 12th day of September, 2017, I caused a true and accurate copy of the:
(i) "Notice of Deadline for Filing Certain Proofs of Claim", as attached in Exhibit 1; and the
(ii) "Proof of Claim", along with the attached Instructions for Proof Claim, as attached in Exhibit 2,

to be served upon the parties as set forth in Exhibit 3, attached hereto, via First Class US Mail.

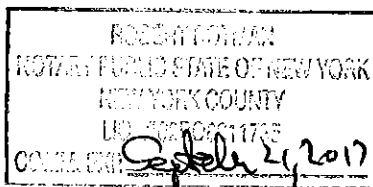
- 4. I declare under penalty of perjury that the foregoing is true and correct to the best of my personal knowledge. Executed this 14th day of September, 2017 at Brooklyn, New York.

By [Signature]
Sung Kim

Sworn before me this
14th day of September, 2017

[Signature]

Notary Public



1 The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: Wordsworth Academy (9031); Wordsworth CUA 5, LLC (0983); and Wordsworth CUA 10, LLC (5980). Wordsworth Academy has an address at 3300 Henry Ave., Philadelphia, PA 19129.

EXHIBIT 1

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:)	Chapter 11
)	
Wordsworth Academy, <i>et al.</i> , ¹)	Case No. 17- 14463 (AMC)
)	
Debtors.)	Jointly Administered
)	

NOTICE OF DEADLINE FOR FILING CERTAIN PROOFS OF CLAIMS

TO ALL CREDITORS AND OTHER PARTIES IN INTEREST:

PLEASE TAKE NOTICE THAT on June 30, 2017 (the "Petition Date") the above captioned debtors and debtors in possession (the "Debtors") filed a voluntary petition for relief under Chapter 11 of title 11 of the United States Code (11 U.S.C. §§ 101, *et seq.*, the "Bankruptcy Code") in the United States Bankruptcy Court for the Eastern District of Pennsylvania (the "Court"). The Debtors are managing their property as debtors in possession pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code.

Pursuant to order of the Court, all persons and entities (each a "Creditor" and, collectively, the "Creditors"), holding or wishing to assert a pre-petition unsecured or secured, priority or non-priority claim (as defined in Section 101(5) of the Bankruptcy Code), and any administrative expense claim pursuant to Section 503(b)(9) of the Bankruptcy Code against any of the Debtors arising or accruing prior to the Petition Date (each a "Claim" and, collectively, the "Claims") are required to file a separate, completed, and executed proof of claim (either a form conforming substantially to Official Bankruptcy Form 10 or another appropriate proof of administrative expense claim (each a "Form" and, collectively, the "Forms")) on account of each such Claim on or before **October 13, 2017** (the "General Bar Date"). Governmental units holding or wishing to assert a Claim are required to file proofs of Claim on or before **December 27, 2017** (the "Governmental Bar Date").

In the event that the Debtors, or any of them, should amend their Schedules of Assets and Liabilities (the "Schedules") subsequent to the date hereof, the Debtors shall give notice of such amendment to the holders of the Claims affected thereby, and such holders shall be afforded the later of the General Bar Date or thirty (30) days from the date on which such notice has been given to such holders to file proofs of Claim or forever be barred from doing so.

Notwithstanding the foregoing, at this time, proofs of Claim are not required to be filed by Creditors holding or wishing to assert Claims against any of the Debtors of the following types (collectively the "Excluded Claims"):

- (a) Claims on account of which a proof of Claim has already been properly filed with the Court;
- (b) Claims previously allowed by, or paid pursuant to, an order of the Court;
- (c) Applications or requests for award of compensation earned or reimbursement of expenses incurred by professionals retained pursuant to Section 327 of the Bankruptcy Code; and
- (d) Scheduled claims which are not listed in the Debtors' Schedules as contingent, unliquidated, or disputed.

Should the Court fix a date in the future after the General Bar Date by which time any of the Excluded Claims must be filed, you will be so notified.

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: Wordsworth Academy (9031); Wordsworth CUA 5, LLC (0983); and Wordsworth CUA 10, LLC (5980). Wordsworth Academy has an address at 3300 Henry Ave., Philadelphia, PA 19129.

The Form must be: (i) **electronically filed** on the Claims Register for this bankruptcy case, **or** (ii) **delivered in hard copy** to the Debtors' claims agent as follows: by regular mail—Donlin, Recano & Company, Inc., Re: Wordsworth Academy, et al., P.O. Box 199043, Blythebourne Station, Brooklyn, New York 11219; and if by courier or overnight mail—Donlin, Recano & Company, Inc., Re: Wordsworth Academy, et al., 6201 15th Avenue, Brooklyn, New York 11219 (whether filed by electronic or hard copy means, **each Form must be filed or received no later than the respective Bar Date**).

Forms **must** be in English and monetary amounts must be in U.S. Dollars.

If you require additional information regarding the filing of a proof of Claim, you may contact the Clerk of the United States Bankruptcy Court for the Eastern District of Pennsylvania, Robert N.C. Nix, Sr. Federal Courthouse, 900 Market Street, Suite 400, Philadelphia, Pennsylvania 19107; (215) 408-2800 **or** Donlin, Recano & Company, Inc., Re: Wordsworth Academy, et al., P.O. Box 199043, Blythebourne Station, Brooklyn, New York 11219; (212) 771-1128; www.donlinrecano.com/Clients/wa/Index.

PLEASE TAKE FURTHER NOTICE THAT, EXCEPT WITH RESPECT TO CLAIMS OF THE TYPE SET FORTH IN PARAGRAPHS (a) THROUGH (d) ABOVE, ANY CREDITOR WHO IS REQUIRED TO FILE A PROOF OF CLAIM AGAINST THE DEBTORS, BUT FAILS TO DO SO ON OR BEFORE OCTOBER 13, 2017, SHALL BE FOREVER BARRED, ESTOPPED AND ENJOINED FROM ASSERTING SUCH CLAIM, AND THE DEBTORS AND THEIR ESTATES SHALL BE FOREVER DISCHARGED FROM ANY AND ALL INDEBTEDNESS OR LIABILITY WITH RESPECT TO SUCH CLAIM, AND SUCH HOLDER SHALL NOT BE PERMITTED TO VOTE ON ANY CHAPTER 11 PLAN OR PARTICIPATE IN ANY DISTRIBUTION IN THE DEBTORS' CHAPTER 11 CASES ON ACCOUNT OF SUCH CLAIM(S).

The Debtors' Schedules and other information may be reviewed and inspected by interested parties as follows: (i) during regular business hours at the office of the Clerk of the United States Bankruptcy Court for the Eastern District of Pennsylvania, Robert N.C. Nix, Sr. Federal Courthouse, 900 Market Street, Suite 400, Philadelphia, PA 19107 (the staff of the Bankruptcy Clerk's Office is prohibited by law from giving legal advice); (ii) at the Court's website <https://ecf.paeb.uscourts.gov/>; **or** (iii) at www.donlinrecano.com/Clients/wa/Index.

Creditors wishing to rely on the Debtors' Schedules are responsible for determining whether their Claims are accurately listed therein.

THE FACT THAT YOU HAVE RECEIVED THIS NOTICE DOES NOT MEAN THAT YOU HAVE A CLAIM AGAINST ANY OF THE DEBTORS. YOU SHOULD CONSULT WITH YOUR OWN ADVISORS TO DETERMINE WHETHER YOU HOLD A CLAIM AGAINST ANY OF THE DEBTORS. YOU SHOULD NOT FILE A PROOF OF CLAIM IF YOU DO NOT HAVE A CLAIM AGAINST ANY OF THE DEBTORS. QUESTIONS CONCERNING THIS NOTICE MAY BE DIRECTED TO THE DEBTORS' COUNSEL LISTED BELOW.

Dated: August 31, 2017
Philadelphia, Pennsylvania

/s/ Anne M. Aaronson

DILWORTH PAXSON LLP
Lawrence G. McMichael
Peter C. Hughes
Anne M. Aaronson
1500 Market St., Suite 3500E
Philadelphia, PA 19102
Telephone: (215) 575-7000
Facsimile: (215) 575-7200

Counsel for the Debtors and Debtors in Possession

EXHIBIT 2

Fill in this information to identify the case:

Proof of Claim

Debtor name: _____
 United States Bankruptcy Court for the Eastern District of Pennsylvania
 Case number: _____

Proof of Claim

04/16

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense other than a claim arising under section 503(b)(9). Make such a request according to 11 U.S.C. § 503. Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach 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. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571. Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor? Name and address of the creditor.	Name and address of creditor (the person or entity to be paid for this claim): Other names the creditor used with the debtor: _____	
2. Has this claim been acquired from someone else?	<input type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g).	Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)
	Name: _____ Address: _____ City: _____ State: _____ Zip: _____ Phone: _____ Email: _____ Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____	Name: _____ Address: _____ City: _____ State: _____ Zip: _____ Phone: _____ Email: _____
4. Does this claim amend one already filed?	<input type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known): _____ Filed on (MM/DD/YYYY): _____	
5. Do you know if anyone else has filed a proof of claim for this claim?	<input type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

Part 2: Give Information About the Claim as of the Date the Case was Filed

6. Do you have any number you use to identify the debtor?	<input type="checkbox"/> No <input type="checkbox"/> Yes. Last 4 digits of the debtor's account or any identification number used: _____	
7. How much is the claim?	\$ _____	Does this amount include interest or other charges? <input type="checkbox"/> No <input type="checkbox"/> Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).
8. What is the basis of the claim?	Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information. _____	

9. Is all or part of the claim secured? No Yes. The claim is secured by a lien on property.

Nature of property: Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*. Motor vehicle Other (describe): _____

Basis for perfection: _____

Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)

Value of property: \$ _____ Amount of the claim that is secured: \$ _____

Amount of the claim that is unsecured (the sum of the secured and unsecured amounts should match the amount in line 7): \$ _____

Amount necessary to cure any default as of the date of the petition: \$ _____ Annual interest rate (when case was filed): _____ % Fixed Variable

10. Is this claim based on a lease? No Yes. Amount necessary to cure any default as of the date of the petition. \$ _____

11. Is this claim subject to a right of setoff? No Yes. Identify the property: _____

12. Is all or part of the claim entitled to: (i) priority under 11 U.S.C. § 507(a), or (ii) administrative expense under 11 U.S.C. § 503(b)(9)? No Yes. Check all that apply:

<input type="checkbox"/> Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).	Amount entitled to priority
<input type="checkbox"/> Up to \$2,850* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).	\$ _____
<input type="checkbox"/> Wages, salaries, or commissions (up to \$12,850*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).	\$ _____
<input type="checkbox"/> Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).	\$ _____
<input type="checkbox"/> Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).	\$ _____
<input type="checkbox"/> Other. Specify subsection of 11 U.S.C. § 507(a){ } that applies.	\$ _____
<input type="checkbox"/> Value of goods received by the debtor within 20 days before the date of commencement of the case. 11 U.S.C. § 503(b)(9).	\$ _____

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

* Amounts are subject to adjustment on 4/01/19 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

- Check the appropriate box:
- I am the creditor.
 - I am the creditor's attorney or authorized agent.
 - I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.
 - I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date (MM/DD/YYYY): _____

Signature: _____

Print the name of the person who is completing and signing this claim:

First name: _____ Middle: _____ Last: _____

Title: _____

Company (identify the corporate servicer as the company if the authorized agent is a servicer): _____

Address: _____

City: _____ State: _____ Zip: _____

Phone: _____ Email: _____

Instructions for Proof of Claim

United States Bankruptcy Court

12/15

These instructions and definitions generally explain the law. In certain circumstances, such as bankruptcy cases that debtors do not file voluntarily, exceptions to these general rules may apply. You should consider obtaining the advice of an attorney, especially if you are unfamiliar with the bankruptcy process and privacy regulations.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157 and 3571.

How to fill out this form

- Fill in all of the information about the claim as of the date the case was filed.
 - Fill in the caption at the top of the form. You must fill in the specific Debtor name and case number against which your claim is being asserted. If you are asserting claims against more than one Debtor, you MUST file a separate proof of claim for each debtor.
 - If the claim has been acquired from someone else, then state the identity of the last party who owned the claim or was the holder of the claim and who transferred it to you before the initial claim was filed.
 - Attach any supporting documents to this form. Attach redacted copies of any documents that show that the debt exists, a lien secures the debt, or both. (See the definition of *redaction* on the reverse page.)

Also attach redacted copies of any documents that show perfection of any security interest or any assignments or transfers of the debt. In addition to the documents, a summary may be added. Federal Rule of Bankruptcy Procedure (called "Bankruptcy Rule") 3001(c) and (d).
 - Do not attach original documents because attachments may be destroyed after scanning.
 - If the claim is based on delivering health care goods or services, do not disclose confidential health care information. Leave out or redact confidential information both in the claim and in the attached documents.
- A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, individual's tax identification number, or financial account number, and only the year of any person's date of birth. See Bankruptcy Rule 9037.
 - For a minor child, fill in only the child's initials and the full name and address of the child's parent or guardian. For example, write *A.B., a minor child (John Doe, parent, 123 Main St., City, State)*. See Bankruptcy Rule 9037.

Confirmation that the claim has been filed

To receive confirmation that the claim has been filed, either enclose a stamped self-addressed envelope and a copy of this form or you may access the claims agent's website (www.donlinrecano.com/wordsworth) to view the filed form.

Understand the terms used in this form

Administrative expense: Generally, an expense that arises after a bankruptcy case is filed in connection with operating, liquidating, or distributing the bankruptcy estate. 11 U.S.C. § 503.

Administrative expense claim under 11 U.S.C. §503(b)(9): Administrative expense claims under 11 U.S.C. §503(b)(9) include those claims for the value of any goods received by the debtor, within 20 days before the date of commencement of a case under the Bankruptcy Code in which the goods have been sold to the debtor in the ordinary course of such debtor's business.

Claim: A creditor's right to receive payment for a debt that the debtor owed on the date the debtor filed for bankruptcy. 11 U.S.C. §101 (5). A claim may be secured or unsecured.

Creditor: A person, corporation, or other entity to whom a debtor owes a debt that was incurred on or before the date the debtor filed for bankruptcy. 11 U.S.C. §101 (10).

Debtor: A person, corporation, or other entity who is in bankruptcy. Use the debtor's name and case number as shown in the bankruptcy notice you received. 11 U.S.C. § 101 (13).

Evidence of perfection: Evidence of perfection of a security interest may include documents showing that a security interest has been filed or recorded, such as a mortgage, lien, certificate of title, or financing statement.

Information that is entitled to privacy: A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, an individual's tax identification number, or a financial account number, only the initials of a minor's name, and only the year of any person's date of birth. If a claim is based on delivering health care goods or services, limit the disclosure of the goods or services to avoid embarrassment or disclosure of confidential health care information. You may later be required to give more information if the trustee or someone else in interest objects to the claim.

Priority claim: A claim within a category of unsecured claims that is entitled to priority under 11 U.S.C. §507(a). These claims are paid from the available money or property in a bankruptcy case before other unsecured claims are paid. Common priority unsecured claims include alimony, child support, taxes, and certain unpaid wages.

Proof of claim: A form that shows the amount of debt the debtor owed to a creditor on the date of the bankruptcy filing. The form must be filed in the district where the case is pending.

Redaction of information: Masking, editing out, or deleting certain information to protect privacy. Filers must redact or leave out information entitled to **privacy** on the *Proof of Claim* form and any attached documents.

Secured claim under 11 U.S.C. §506(a): A claim backed by a lien on particular property of the debtor. A claim is secured to the extent that a creditor has the right to be paid from the property before other creditors are paid. The amount of a secured claim usually cannot be more than the value of the particular property on which the creditor has a lien. Any amount owed to a creditor that is more than the value of the property normally may be an unsecured claim. But exceptions exist; for example, see 11 U.S.C. § 1322(b) and the final sentence of 1325(a).

Examples of liens on property include a mortgage on real estate or a security interest in a car. A lien may be voluntarily granted by a debtor or may be obtained through a court proceeding. In some states, a court judgment may be a lien.

Setoff: Occurs when a creditor pays itself with money belonging to the debtor that it is holding, or by canceling a debt it owes to the debtor.

Uniform claim identifier: An optional 24-character identifier that some creditors use to facilitate electronic payment.

Unsecured claim: A claim that does not meet the requirements of a secured claim. A claim may be unsecured in part to the extent that the amount of the claim is more than the value of the property on which a creditor has a lien.

Offers to purchase a claim

Certain entities purchase claims for an amount that is less than the face value of the claims. These entities may contact creditors offering to purchase their claims. Some written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court, the bankruptcy trustee, or the debtor. A creditor has no obligation to sell its claim. However, if a creditor decides to sell its claim, any transfer of that claim is subject to Bankruptcy Rule 3001(e), any provisions of the Bankruptcy Code (11 U.S.C. § 101 et seq.) that apply, and any orders of the bankruptcy court that apply.

Do not file these instructions with your form.

EXHIBIT 3

Document Page 11 of 11
Wordsworth Academy, et al.
Exhibit Page

Page # : 1 of 1

09/12/2017 05:10:57 PM

007754P001-1369A-40B
 ALL ABOUT KIDZ
 5613 N 5TH ST
 PHILADELPHIA PA 19120

007862P001-1369A-40B
 MORRIS AZHANE
 MORR04
 ADDRESS INTENTIONALLY OMITTED

007874P001-1369A-40B
 QUEEN BRAHEIM
 QUEE00
 ADDRESS INTENTIONALLY OMITTED

007814P001-1369A-40B
 COLEMAN CENQUETTE
 COLE07
 ADDRESS INTENTIONALLY OMITTED

007778P001-1369A-40B
 COMMONWEALTH OF PA PRIV SCHOOL
 DIV OF PLANNING PRIVATE SCHOOLS OFFICE
 333 MARKET ST 3RD FL
 HARRISBURG PA 17126-0333

007777P001-1369A-40B
 COMMONWEALTH OF PENNSYLVANIA
 BUREAU OF MOTOR VEHICLES
 HARRISBURG PA 17104-2516

007816P001-1369A-40B
 JACK COTTOM
 COTT01
 ADDRESS INTENTIONALLY OMITTED

007886P001-1369A-40B
 DAVID SENNO
 ADDRESS INTENTIONALLY OMITTED

007824P001-1369A-40B
 EFAX CORPORATE
 J2 CLOUD SVC INC
 PO BOX 51873
 LOS ANGELES CA 90051-6173

007828P001-1369A-40B
 FREEMAN ELLEN
 ADDRESS INTENTIONALLY OMITTED

007836P001-1369A-40B
 ROSS HOLMES
 ADDRESS INTENTIONALLY OMITTED

007840P001-1369A-40B
 JASMINE JOHNSON
 JOHN29
 ADDRESS INTENTIONALLY OMITTED

000077P001-1369S-40B
 LIPSKY AND BRANDT
 DANA K COYNE
 1101 MARKET ST STE 2820
 PHILADELPHIA PA 19107

007854P001-1369A-40B
 MASSEY MAURICA
 MASS02
 ADDRESS INTENTIONALLY OMITTED

007866P001-1369A-40B
 RANDALL OVERTON
 OVER00
 ADDRESS INTENTIONALLY OMITTED

000078P001-1369S-40B
 PARKER IBRAHIM & BERG LLC
 FRED W. HOENSCH, ESQ.
 1635 MARKET STREET, 11TH FLOOR
 PHILADELPHIA PA 19103

007883P001-1369A-40B
 LAUREN SANTOS
 SANT02
 ADDRESS INTENTIONALLY OMITTED

007889P001-1369A-40B
 SHADY BROOK FARM MARKETS INC
 931 STONY HILL RD
 YARDLEY PA 19067

007918P002-1369A-40B
 SHAKEIRA PATTERSON
 AS P/N/G OF LORIE PATTERSON
 JAFFE & HOUGH TIMOTHY HOUGH
 1907 TWO PENN CTR
 PHILADELPHIA PA 19102

007822P001-1369A-40B
 DUKES SHAWN
 ADDRESS INTENTIONALLY OMITTED

007907P001-1369A-40B
 TANESIA WEBB
 ADDRESS INTENTIONALLY OMITTED

007900P001-1369A-40B
 TRI-STATE TRAINING AND SAFETY CONSULT
 1320 E 11TH ST
 EDDYSTONE PA 19022

007831P001-1369A-40B
 GRIFFIN TYERRA
 ADDRESS INTENTIONALLY OMITTED