

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION
www.flsb.uscourts.gov

IN RE: Case No.: 12-30081-BKC-EPK
CLSF III IV, Inc., *et al.*, Chapter 7
Debtors. (Substantively Consolidated)

**TRUSTEE’S MOTION TO APPROVE SETTLEMENT AGREEMENT AND RELEASE
BETWEEN (I) DEBORAH C. MENOTTE, TRUSTEE; AND (II) CLIFFORD CHANCE
LLP, WITH RESPECT TO ADVERSARY NO.: 14-01599-EPK**

NOTICE

Any interested party who fails to file and serve a written response to this motion within 21 days after the date of service stated in this motion shall, pursuant to Local Rule 9013-(D), be deemed to have consented to the entry of an order in the form attached to this motion. Any scheduled hearing may then be canceled.

Deborah C. Menotte, the duly appointed and permanent Chapter 7 Trustee (the “Trustee”) for the substantively consolidated bankruptcy estates of CLSF III IV, Inc., *et al.* (collectively, the “Debtors”), by and through undersigned counsel, files this *Trustee’s Motion to Approve Settlement Agreement Between (I) Deborah C. Menotte, Trustee; and (II) Clifford Chance LLP, With Respect to Adversary No.: 14-01599-EPK* (the “Motion”), pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure, seeking approval of a compromise and settlement between (i) the Trustee; and (ii) Clifford Chance LLP (“Clifford Chance” and, together with the Trustee, collectively, the “Parties”), with respect to Adversary No. 14-01599-EPK. In support of this Motion, the Trustee states:

Background

1. On August 22, 2012 (the “Petition Date”), the above-captioned bankruptcy case was commenced by the filing of an involuntary petition for relief in this Court against CLSF III

IV, Inc. (the “Debtor”) under Chapter 7 of the Bankruptcy Code.

2. Thereafter, thirty-two affiliates (the “Affiliates”) of the Debtor (together with the Debtor, collectively, the “Debtors”) filed voluntary petitions for relief under Chapter 7 of the Bankruptcy Code between October 24, 2012 and November 7, 2012.

3. Deborah C. Menotte is the duly appointed and acting Chapter 7 Trustee of the Debtors’ estates.

4. On August 21, 2014, the Trustee commenced an adversary proceeding against Clifford Chance styled *Deborah C. Menotte, Trustee v. Clifford Chance LLP*, Adv. Pro. No. 14-01599-EPK (“Adversary Proceeding”). By the Adversary Proceeding, the Trustee asserted claims to avoid and recover transfers made by the Debtors to Clifford Chance which totaled not less than \$80,000.00 (the “Transfers”), pursuant to 11 U.S.C. §§ 547 and 550 (the “Avoidance Claims”).

5. Clifford Chance presented the Trustee with certain defenses regarding the Transfers.

Relief Requested

6. The Parties have conducted settlement discussions relating to a settlement of the Adversary Proceeding and in order to avoid the costs and uncertainty attendant to litigation, and, after good faith and arms-length negotiations, have agreed to fully and finally settle all disputes over the Transfers and Avoidance Claims on the terms set forth herein, which includes (i) a payment by Clifford Chance in the amount of \$15,000.00 (the “Settlement Amount”); and (ii) dismissal of the Adversary Proceeding with prejudice by the Trustee.

7. The Parties have entered into a *Settlement Agreement and Release* (the “Agreement”) dated November 21, 2014, a copy of which is attached hereto as **Exhibit “A,”** and

is subject to the approval of this Court after notice and hearing.

8. The additional terms of the Agreement are set forth below:

a. **Settlement Payment:** Upon execution of the Agreement by the Parties, Clifford Chance shall deliver to counsel to the Trustee, as escrow agent (in such capacity, the “Escrow Agent”) (Attn: Leslie Gern Cloyd, Esq., BERGER SINGERMAN LLP, 350 East Las Olas Blvd, Suite 1000, Fort Lauderdale, FL 33301) the Settlement Amount to be held in escrow (the “Escrow Funds”) in the firm's trust account and specifically designated in the records of the Escrow Agent as Escrow Funds for Clifford Chance (the “Escrow Account”) by the Escrow Agent. Unless and until the Effective Date occurs in accordance with the terms of the Agreement, the Trustee: (i) shall have no interest, legal or equitable, and hereby disclaims any such interest, in the Escrow Funds and acknowledges that the Escrow Funds shall not constitute property of the Debtors’ estate; and (iii) shall seek no relief from the Court by which it seeks an order to declare the Debtors’ estate has any interest in or rights to Escrow Funds or otherwise seeks possession of any or all of such funds.

b. Promptly upon receipt of the Settlement Amount in cleared funds (and in any event not more than ten (10) business days from such receipt), the Trustee shall file a motion with the Court in a form which is reasonably agreeable to Clifford Chance seeking entry of an order approving the Agreement (the “Motion”).

c. Upon the Effective Date, the Settlement Amount will be deemed to have been paid to the Trustee in full and complete satisfaction of all claims of the Debtors against Clifford Chance under or in connection with the Transfers, the Avoidance Claims and the Adversary Proceeding, and the Escrow Funds may be released to the Trustee.

d. Unless otherwise agreed in writing by the Parties, if the Motion is not filed within 10 business days of receipt of the Settlement Amount in cleared funds or the Effective Date does not occur within sixty (60) days of the filing of the Motion (in each case, the “Outside Date”) the Agreement shall terminate in accordance with Section 6 thereof.

e. **Dismissal of Adversary Proceeding:** Promptly upon the Effective Date and in any event not more than ten (10) business days from the Effective Date, the Trustee will file a notice with the Court dismissing the Adversary Proceeding against Clifford Chance with prejudice.

f. **Release:** In consideration of each other Party’s execution of the Agreement, the settlement embodied therein, dismissal of the Adversary Proceeding, and payment of the Settlement Amount, as of the Effective Date each Party on behalf of itself and any other party, person or entity claiming under or through it, generally releases, discharges and acquits each other Party, and its respective current and former agents, servants, officers, directors, shareholders, employees, subsidiaries, divisions, branches, units, affiliates, partners and partnerships, related and affiliated partners, parents, attorneys, successors, predecessors, heirs, representatives, and assigns (each of the foregoing, a “Released Party”), from all manners of action, causes of action, judgments, executions, debts, demands, rights, damages, costs, expenses, and claims of every kind, nature, and character whatsoever (including, without limitation, claims for avoidance and recovery under chapter 5 of the Bankruptcy Code), other than the rights and obligations of the Parties set forth under the Agreement, whether in law or in equity, whether based on contract (including, without limitation, quasi-contract or estoppel), statute, regulation, tort (including, without limitation, intentional torts, fraud, misrepresentation, defamation, breaches of alleged fiduciary duty, recklessness, gross negligence, or negligence) or

otherwise, accrued or unaccrued, known or unknown, matured, unmatured, liquidated or unliquidated, certain or contingent, asserted or unasserted, that such releasing Party ever had or claimed to have, or now has or claims to have presently or at any future date, against any Released Party arising under or related to the Transfers, the Avoidance Claims and the Adversary Proceeding.

g. **Termination:**

i. The Agreement shall terminate and, except as otherwise specified in the Agreement, shall be of no further force and effect upon the occurrence of a Termination Event. For purposes of the Agreement, a “Termination Event” means the failure of the Effective Date to occur in accordance with the Agreement for any reason.

ii. Upon the occurrence of the Termination Event, the Escrow Agent, without any exercise of discretion, or notice, direction, or order of the Court, shall promptly, but in no more than three (3) business days from the Termination Event, return the Escrow Funds to Clifford Chance, by wire transfer or other reasonable means directed by Clifford Chance, without deduction, set off, defense, or counterclaim. The Trustee in such circumstances shall seek no relief that, in any manner or under any theory of law or equity, the effect of which is to delay or prevent the return of the Escrow Funds to Clifford Chance in accordance with the Agreement.

iii. The obligations of the Trustee and the Escrow Agent in sub-section (b) of Section 6 of the Agreement and the obligations and acknowledgments of the Trustee in Section 3 of the Agreement shall survive the termination of the Agreement.

h. **Successors:** The Agreement shall be binding in all respects upon, and shall inure to the benefit of Clifford Chance, the Debtors, and the Trustee, and their respective heirs, successors and assigns.

i. **Final Agreement:** The Parties agree that there are no other agreements between the Parties, and that the Agreement constitutes the entire agreement of the Parties concerning its terms, and a complete merger of prior negotiations and agreements relating to those terms.

j. **No Admissions:** The Parties agree that neither the Agreement, the termination of the Agreement, nor any actions taken by the Parties thereto, either previously or in connection with the compromise reflected in the Agreement, shall be deemed or construed to be an admission of the truth or falsity of any matter or any claim, demand, or cause of action referred to herein or relating to the subject matter of the Agreement, or any defense asserted thereto, or evidence of any violation of any statute or law or any liability or wrongdoing by any party, or any acknowledgment by them of any fault or liability to any party thereto.

k. **Full Authority:** Each of the Parties and the Escrow Agent represents that its signatory below has the full authority to execute, deliver and fully perform the Agreement and is fully authorized to bind its respective Parties to all the terms and conditions of the Agreement.

l. **Attorneys' Fees and Costs:** The Parties shall bear their own attorneys' fees, costs and expenses.

m. **Modification:** The Agreement may not be modified other than by a signed writing executed by an authorized representative of the Parties, or by further order of the Court.

n. **Headings:** Headings are intended solely as a convenience and shall not control the meaning or interpretation of any provision of the Agreement.

o. **Construction:** The Parties acknowledge that they and their respective counsel have reviewed the Agreement in its entirety and have had a full and fair opportunity to negotiate its terms. Each Party therefore waives all applicable rules of construction that any

provision of the Agreement should be construed against its drafter, and agrees that all provisions of the Agreement shall be construed as a whole, according to the fair meaning of the language used.

p. **Choice of Law:** The Agreement shall be governed by and construed in accordance with the laws of the State of New York without regard to the State of New York's rules concerning conflicts of laws.

q. **Choice of Forum:** The Parties agree that any action arising from or related to the enforcement or implementation of the Agreement shall be brought in the Court.

9. The Parties to the Agreement believe that the settlement set forth therein is in the best interests of the Debtors' estates and Clifford Chance. Accordingly, by this Motion, the Trustee requests the entry of an Order approving the Agreement in its entirety, after notice to creditors and parties in interest.

Legal Analysis

10. The Trustee seeks approval of the Agreement pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure.

11. Rule 9019(a) provides that, after notice and a hearing, a court may approve a proposed settlement of a claim. The decision of whether or not to approve a compromise is within the sound discretion of the court. *In re Carson*, 82 B.R. 847 (Bankr. S.D. Ohio 1987); *In re Mobile Air Drilling Co.*, 53 B.R. 605 (Bankr. N.D. Ohio 1985).

12. In passing on proposed settlements, the standard that courts applied under the former Bankruptcy Act is the same standard as courts should apply under the Bankruptcy Code. *In re Carla Leather, Inc.*, 44 B.R. 457, 466 (Bankr. S.D.N.Y. 1984). As stated by the United States Supreme Court in *Protective Committee v. Anderson*, 300 U.S. 414 (1968), under the Act, to approve a proposed settlement, a court must find that the settlement was "fair and

equitable” based on an educated estimate of the complexity, expense, and likely duration of . . . litigation, the possible difficulties of collecting on any judgment which might be obtained and all other factors relevant to a full and fair assessment of the wisdom of the proposed compromise. *Protective Committee*, 300 U.S. at 424.

13. This test was adopted by the Eleventh Circuit in *In re Justice Oaks II, Ltd.*, 898 F.2d 1544, 1549 (11th Cir. 1990), which provides additional guidance as to whether a compromise should be approved. *Justice Oaks* established a four-part test for approval:

- (a) The probability of success in litigation;
- (b) The difficulties, if any, to be encountered in the matter of collection;
- (c) The complexity of the litigation involved and the expense, inconvenience and delay necessarily attending it; and
- (d) The paramount interest of the creditors and a proper deference to their reasonable views in the premises.

14. The Agreement satisfies the *Justice Oaks* standard.

15. Applying the foregoing, the terms of the Agreement satisfy that four-part test relating to the Rule 9019 request. The Trustee believes that after full and careful consideration of the merits of the Adversary Proceeding, settlement of the Adversary Proceeding pursuant to the terms set forth herein and in the Agreement would be in the best interests of the Debtors’ estate.

16. Additionally, counsel for the Trustee is mindful of the additional administrative expenses that will be incurred in the event that the Agreement is not approved. The Trustee believes that resolution of the Adversary Proceeding in the manner set forth herein and in the Agreement is reasonable and falls well within the range of reasonableness as required by Rule

9019 of the Federal Rules of Bankruptcy Procedure and applicable law.

WHEREFORE, the Trustee respectfully requests that this Court enter an Order, in the form attached hereto as **Exhibit “B;”**

- a. Granting this Motion;
- b. Approving the Agreement in its entirety; and
- c. Granting such other and further relief as the Court deems just and proper.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on the 1st day of December, 2014, via electronic transmission through the Court’s CM/ECF system upon all parties on the attached CM/ECF Service List; electronic transmission upon all parties on the List of Creditors Who Have Consented to Electronic Service and List of Foreign Investors Who Have Consented to Electronic Service attached to the original of this Motion; and via first class, U.S. Mail upon all parties listed below and identified on the Matrices attached to the original of this Motion.

Dated: December 1, 2014

Respectfully submitted,

BERGER SINGERMAN LLP
Counsel for the Trustee
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Fort Lauderdale, FL 33301
Tel. (954) 525-9900
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By: /s/ Leslie Gern Cloyd

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EXHIBIT “A”

SETTLEMENT AGREEMENT AND RELEASE

This Settlement Agreement and Release ("Agreement") is entered into by and between Deborah C. Menotte, in her sole capacity as Chapter 7 Trustee (the "Trustee") for the substantively consolidated bankruptcy estates of the Debtors (as defined below) on the one hand and Clifford Chance LLP ("Clifford Chance") on the other. The Trustee and Clifford Chance shall each be referred to individually as a "Party" and collectively as the "Parties."

RECITALS

WHEREAS, On August 22, 2012 (the "Commencement Date"), an involuntary petition for relief was filed against CLSF III IV, Inc. under chapter 7 of title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court Southern District of Florida West Palm Beach Division (the "Court") and thereafter thirty-two affiliated entities filed voluntary petitions for relief under chapter 7 of the Bankruptcy Code (the "Debtor-Affiliates").

WHEREAS, pursuant to those certain Orders Granting Substantive Consolidation, dated October 2, 2013 and August 6, 2014 [ECF Nos. 561 and 857] the cases of CLSF III IV, Inc., the Debtor-Affiliates, Deborah Catherine Peck, Deborah C. Peck, Esq., PA, and certain other entities as set forth therein were substantively consolidated (collectively, such substantively consolidated entities, the "Debtors").

WHEREAS, the Trustee is duly qualified pursuant to Section 322 of the Bankruptcy Code, and serves as the chapter 7 trustee for each of the Debtors pursuant to Section 702(d) of the Bankruptcy Code.

WHEREAS, the Trustee asserts that the Debtors made certain transfers to Clifford Chance in connection with the provision of legal services (the "Transfers") which totaled not less than \$80,000 and that such Transfers are avoidable and recoverable under the provisions of §547 and 550 of the Bankruptcy Code, respectively (the "Avoidance Claims").

WHEREAS, the Trustee has filed an adversary proceeding asserting the Avoidance Claims against Clifford Chance [Adv. Pro. No. 14-01599] (the "Adversary Proceeding").

WHEREAS, the Parties seek to avoid the costs and uncertainty attendant to litigation, and, after good faith and arms-length negotiations, have agreed to fully and finally settle all disputes over the Transfers and Avoidance Claims on the terms set forth herein, including (i) payment by Clifford Chance in the amount of \$15,000.00 (the "Settlement Amount"); and (ii) dismissal of the Adversary Proceeding with prejudice by the Trustee.

AGREEMENT

NOW, THEREFORE, in consideration of the recitals set forth above and promises made herein, the receipt and sufficiency of which is hereby acknowledged, the Parties hereto agree as follows:

1. **Effective Date**: Provided that the Outside Date (as defined below) has not occurred, this Agreement becomes effective on (i) execution by the Parties; and (ii) the entry by the Court of a final non-appealable Order approving the Agreement (the date that all such conditions have been satisfied, the "Effective Date").
2. **Recitals**: The Recitals set forth above form an integral part of this Agreement and are incorporated fully herein.
3. **Settlement Payment**: Upon execution of this Agreement by the Parties, Clifford Chance shall deliver to counsel to the Trustee, as escrow agent (in such capacity, the "Escrow Agent") (Attn: Leslie Gern Cloyd, Esq., BERGER SINGERMAN LLP, 350 East Las Olas Blvd, Fort Lauderdale, FL 33301) the Settlement Amount to be held in escrow (the "Escrow Funds") in the firm's trust account and specifically designated in the records of the Escrow Agent as Escrow Funds for Clifford Chance (the "Escrow Account") by the Escrow Agent. Unless and until the Effective Date occurs in accordance with the terms of this Agreement, the Trustee: (i) shall have no interest, legal or equitable, and hereby disclaims any such interest, in the Escrow Funds and acknowledges that the Escrow Funds shall not constitute property of the Debtors' estate; and (iii) shall seek no relief from the Court by which it seeks an order to declare the Debtors' estate has any interest in or rights to Escrow Funds or otherwise seeks possession of any or all of such funds.

Promptly upon receipt of the Settlement Amount in cleared funds (and in any event not more than ten (10) business days from such receipt), the Trustee shall file a motion with the Court in a form which is reasonably agreeable to Clifford Chance seeking entry of an order approving this Agreement (the "Motion").

Upon the Effective Date, the Settlement Amount will be deemed to have been paid to the Trustee in full and complete satisfaction of all claims of the Debtors against Clifford Chance under or in connection with the Transfers, the Avoidance Claims and the Adversary Proceeding, and the Escrow Funds may be released to the Trustee.

Unless otherwise agreed in writing by the Parties, if the Motion is not filed within 10 business days of receipt of the Settlement Amount in cleared funds or the Effective Date does not occur within sixty (60) days of the filing of the Motion (in each case, the "Outside Date") this Agreement shall terminate in accordance with Section 6 hereof.

4. **Dismissal of Adversary Proceeding**: Promptly upon the Effective Date and in any event not more than ten (10) business days from the Effective Date, the Trustee will file a notice with the Court dismissing the Adversary Proceeding against Clifford Chance with prejudice.

5. **Release**: In consideration of each other Party's execution of this Agreement, the settlement embodied herein, dismissal of the Adversary Proceeding, and payment of the Settlement Amount, as of the Effective Date each Party on behalf of itself and any other party, person or entity claiming under or through it, hereby generally releases, discharges and

acquits each other Party, and its respective current and former agents, servants, officers, directors, shareholders, employees, subsidiaries, divisions, branches, units, affiliates, partners and partnerships, related and affiliated partners, parents, attorneys, successors, predecessors, heirs, representatives, and assigns (each of the foregoing, a "Released Party"), from all manners of action, causes of action, judgments, executions, debts, demands, rights, damages, costs, expenses, and claims of every kind, nature, and character whatsoever (including, without limitation, claims for avoidance and recovery under chapter 5 of the Bankruptcy Code), other than the rights and obligations of the Parties set forth under this Agreement, whether in law or in equity, whether based on contract (including, without limitation, quasi-contract or estoppel), statute, regulation, tort (including, without limitation, intentional torts, fraud, misrepresentation, defamation, breaches of alleged fiduciary duty, recklessness, gross negligence, or negligence) or otherwise, accrued or unaccrued, known or unknown, matured, unmatured, liquidated or unliquidated, certain or contingent, asserted or unasserted, that such releasing Party ever had or claimed to have, or now has or claims to have presently or at any future date, against any Released Party arising under or related to the Transfers, the Avoidance Claims and the Adversary Proceeding.

6. **Termination:**

(a) This Agreement shall terminate and, except as otherwise specified in this Agreement, shall be of no further force and effect upon the occurrence of a Termination Event. For purposes of this Agreement, a "Termination Event" means the failure of the Effective Date to occur in accordance with this Agreement for any reason.

(b) Upon the occurrence of the Termination Event, the Escrow Agent, without any exercise of discretion, or notice, direction, or order of the Court, shall promptly, but in no more than three (3) business days from the Termination Event, return the Escrow Funds to Clifford Chance, by wire transfer or other reasonable means directed by Clifford Chance, without deduction, set off, defense, or counterclaim. The Trustee in such circumstances shall seek no relief that, in any manner or under any theory of law or equity, the effect of which is to delay or prevent the return of the Escrow Funds to Clifford Chance in accordance with this Agreement.

(c) The obligations of the Trustee and the Escrow Agent in sub-section (b) of this Section and the obligations and acknowledgments of the Trustee in Section 3 of this Agreement shall survive the termination of this Agreement.

7. **Successors:** This Agreement shall be binding in all respects upon, and shall inure to the benefit of Clifford Chance, the Debtors, and the Trustee, and their respective heirs, successors and assigns.

8. **Final Agreement:** The Parties agree that there are no other agreements between the Parties, and that this Agreement constitutes the entire agreement of the Parties concerning its terms, and a complete merger of prior negotiations and agreements relating to those terms.

9. **No Admissions:** The Parties hereto agree that neither this Agreement, the termination of this Agreement, nor any actions taken by the Parties hereto, either previously or in connection with the compromise reflected in this Agreement, shall be deemed or construed to be an admission of the truth or falsity of any matter or any claim, demand, or cause of action referred to herein or relating to the subject matter of this Agreement, or any

defense asserted thereto, or evidence of any violation of any statute or law or any liability or wrongdoing by any party, or any acknowledgment by them of any fault or liability to any party hereto.

10. **Full Authority**: Each of the Parties and the Escrow Agent represents that its signatory below has the full authority to execute, deliver and fully perform this Agreement and is fully authorized to bind its respective Parties to all the terms and conditions of this Agreement.

11. **Attorneys' Fees and Costs**: The Parties shall bear their own attorneys' fees, costs and expenses.

12. **Modification**: This Agreement may not be modified other than by a signed writing executed by an authorized representative of the Parties, or by further order of the Court.

13. **Headings**: Headings are intended solely as a convenience and shall not control the meaning or interpretation of any provision of this Agreement.

14. **Construction**: The Parties acknowledge that they and their respective counsel have reviewed this Agreement in its entirety and have had a full and fair opportunity to negotiate its terms. Each Party therefore waives all applicable rules of construction that any provision of this Agreement should be construed against its drafter, and agrees that all provisions of this Agreement shall be construed as a whole, according to the fair meaning of the language used.

15. **Choice of Law**: This Agreement shall be governed by and construed in accordance with the laws of the State of New York without regard to the State of New York's rules concerning conflicts of laws.

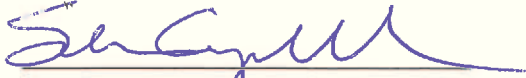
16. **Choice of Forum**: The Parties agree that any action arising from or related to the enforcement or implementation of this Agreement shall be brought in the Court.

17. **Severability:** The invalidity or unenforceability of any particular provision of this Agreement shall not affect the other provisions hereof, and this Agreement shall be construed in all respects as if the invalid or unenforceable provision had been omitted.

18. **Counterparts and Facsimiles:** This Agreement may be executed in counterparts, and delivery may be effected by transmission of executed counterparts by electronic means, or by facsimile, all of which shall be given the same force and effect as a manually executed original.

IN WITNESS HEREOF, the undersigned execute this Agreement as follows:

Clifford Chance LLP

By: 
Name: SARAH CAMPBELL
Title: ASSOCIATE

The Trustee

By: _____
Deborah C. Menotte, in her capacity as
Trustee in bankruptcy to the Debtors

BERGER SINGERMAN LLP, solely in its
capacity as Escrow Agent

By: _____

17. **Severability:** The invalidity or unenforceability of any particular provision of this Agreement shall not affect the other provisions hereof, and this Agreement shall be construed in all respects as if the invalid or unenforceable provision had been omitted.

18. **Counterparts and Facsimiles:** This Agreement may be executed in counterparts, and delivery may be effected by transmission of executed counterparts by electronic means, or by facsimile, all of which shall be given the same force and effect as a manually executed original.

IN WITNESS HEREOF, the undersigned execute this Agreement as follows:

Clifford Chance LLP

By: _____
Name:
Title:

The Trustee

By: Deborah C Menotte
Deborah C. Menotte, in her capacity as
Trustee in bankruptcy to the Debtors

BERGER SINGERMANN LLP, solely in its
capacity as Escrow Agent

By: /s/ Leslie Gern Cloyd

EXHIBIT ‘B’

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION
www.flsb.uscourts.gov

IN RE:

Case No.: 12-30081-BKC-EPK

CLSF III IV, INC., *et al.*

Chapter 7
(Substantively Consolidated)

Debtors.
_____ /

**ORDER GRANTING TRUSTEE'S MOTION TO APPROVE SETTLEMENT
AGREEMENT AND RELEASE BETWEEN (I) DEBORAH C. MENOTTE,
TRUSTEE; AND (II) CLIFFORD CHANCE LLP, WITH
RESPECT TO ADVERSARY NO.: 14-01599-EPK**

THIS MATTER came before the Court upon the *Trustee's Motion to Approve Settlement Agreement and Release Between (I) Deborah C. Menotte, Trustee; and (II) Clifford Chance LLP, With Respect to Adversary No.: 14-01599-EPK* [ECF No. ____] (the "Motion"). The Court, having considered the Motion and the *Settlement Agreement and Release* (the "Agreement") attached to the Motion as Exhibit "A," having noted that no objections to the Motion were filed as evidenced by the *Certificate of No Response or Settlement and Request for Entry of Order* [ECF No. ____] filed on December ____, 2014, and being otherwise fully advised in the premises, does thereupon

ORDER as follows:

1. The Motion is **GRANTED**.
2. The Agreement is **APPROVED** in its entirety.
3. Upon the Effective Date¹ and in any event not more than ten (10) business days from the Effective Date, the Trustee shall file a notice with the Court dismissing, with prejudice, the adversary proceeding captioned *Deborah C. Menotte, Chapter 7 Trustee v. Clifford Chance LLP*; Adv. No. 14-01599-EPK.
4. The Parties are directed to comply with the terms and conditions of the Agreement, and the Court retains jurisdiction to enforce the terms thereof.

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Submitted by:

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Copies to:

Leslie Gern Cloyd, Esq.
(Attorney Cloyd shall serve a copy of this Order upon all interested parties upon receipt and file a Certificate of Service.)

¹ Capitalized terms used but not defined herein shall have the meanings ascribed in the Motion and Agreement.

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Pascal	Anckaert	pascal.anckaert@gmail.com	08/21/2013
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Wilhelmus Albertus	Arendsen	wim.arendsen@planet.nl	04/15/2014
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Koen	Behaeghe	koen.behaeghe@telenet.be	08/23/2013
Pien	Beheer b.v.	pbruijstens@upcmail.nl	08/19/2013
Stelo	Beheer B.V.	stelo@live.nl	04/17/2014
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	Bols - Van De Pol	bols.vandepol@skynet.be	08/24/2013
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Arjen	Bouwmeester	abouwmeester@gmail.com	08/21/2013
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THE NETHERLANDS

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Maikel Bongers
Willem Alexanderlaan 18
5664 AN Geldrop
THE NETHERLANDS - **INCORRECT
ADDRESS, RECEIVED CONSENT TO
EMAIL SERVICE**

John Boot
Torenlaan 55B
1291 Laren hh
THE NETHERLANDS

Theo M Botden
Grotiuslaan 6
2353 BV Leiderdorp
THE NETHERLANDS

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Roger Bovy
Roland Holstlaan 2
2662 Bergschenhoek
THE NETHERLANDS

J.L. Bressers
Vincent Van De Helluelstraat 16
5666 TL Goldrop
THE NETHERLANDS

Gijsbert Broere
Parcivalring 491
5221 LK Den Bosch
THE NETHERLANDS

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P.A. Bruikstens
Bosrand 144
5665 ET Geldrop
THE NETHERLANDS

C.A.J.
Buizerdlaan 271
Leidschendam 2261 CV
THE NETHERLANDS

Simonne Eveline E Caeldries
Leestraat 16
9112 Sinaai-Waas
BELGIUM

RECEIVED CONSENT TO EMAIL SERVICE

A.M.M. Cardoen
Patappeltorenweg 43
2900 Schoten
BELGIUM

Luca Celati
Chemin De L'ouche-Dessus 54
CH-1616 AH Nens
SWITZERLAND

Clifford Chance
31 West 52nd Street
New York, NY 10019-6131

RECEIVED CONSENT TO EMAIL SERVICE

GM Cirkel
Ten Veldestraat 111
3454 EK De Meern
THE NETHERLANDS

Reed Collingwood
c/o Kelley & Fulton, PL
1665 Palm Beach Lakes Blvd
Suite 1000
West Palm Beach, FL 33401-2109

Christopher Conway
Longevity Market Advisors, LLC
1200 Abernathy Rd #1700
Atlanta, GA 30328-5671

Jan Cornells Honkoop
Wilgenlaan 178
116 JR Zwanenburg
THE NETHERLANDS

William Cortvriendt
Urb. Altos de los Monteros, Calle Hiedro
29603 Marbella,
SPAIN

Cuylenborg P van
Boetzelaerlaan 197
2581 At The Hague
THE NETHERLANDS

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Cuylenborg P van
Boetzelaerlaan 197
2581AT Den Haag
THE NETHERLANDS

Mr ZHV Cybulkiewicz and SDM
Cybulkiewicz
Kneppelhoutstraat 60
1053GZ Amsterdam
THE NETHERLANDS

Geert De Boeck
Baardegem Dorp 13
9310 Baardegem Aalst
BELGIUM

RECEIVED CONSENT TO EMAIL

Wim A.M. de Boer
Binnendijk 58
8244AH Lelystad
THE NETHERLANDS

Jacobus Petrus Maria de Groot
Bruine Kolk 23
2490 Balen
BELGIUM

Dirk de Jong
De Oude Visscher 27
1189 WL Amstelveen
THE NETHERLANDS

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Joseph & Rosie de Jong
Zurenborgstraat 10
2018 Antwerpen
BELGIUM

Martin de Jong
Schubertstraat 34
1077 GT Amsterdame
THE NETHERLANDS

Jonkheer J. Maurits de Jonge
Huijgenslaan 26
3818 WC Amersfoort
THE NETHERLANDS

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De Keyser Henri Vanderschaeghe
Sijsostraat 13
8020 Riddervoorde
BELGIUM

De Keyser - Declered
St Hubertstraat 180B
9800 Deimle
BELGIUM

De Keyser FE - De Clered GM
St Hubertstraat 180B
9800 Deimre
BELGIUM

DUPLICATE

Dominique M A De Leersnyder
Pittemsestraat 20
8850 Adooie
BELGIUM

J.M.F. De Louw
Zandstraat 2
5374 NB Schaijk
THE NETHERLANDS

Carl G. De Muynck
Gilbertlaan 19
1050 Brussel
BELGIUM

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MAIL RETURNED

W.G.M. De Pauw
Walstraat 32
2070 Zwijndrecht
BELGIUM

Ida de Reus-Oosterhuis
Kerkbuurt 52
9265 LT Suawoude
THE NETHERLANDS

Jan De Schepper
Walstraat 32
2070 Zwijndrecht
BELGIUM

RECEIVED CONSENT TO EMAIL SERVICE

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Roger L. De Wolf
Hekkerstraat 35
3908 Hofstade, Aalst, Belgium

Anny A Romain Defrere
Poelkbeekstraat 14
Roosdaal 1760
BELGIUM

Deklerck Erik Taveirne
Pierlapont 84
8210 Zedelgem
BELGIUM

RECEIVED CONSENT TO EMAIL SERVICE

Deney BVBA
Kleistraat 4
1761 Rppsdaal
BELGIUM

Hilda Camile G. Derycke
Cecile Cautermanstraat 1
9040 Gent
BELGIUM

Nora Josephine D Derycke
Penitentenstraat 23
9000 Gent
BELGIUM

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Rudolf Deutekom
Melkweg 26C
1251 PS Laren
THE NETHERLANDS

Gilbert Dewaele
L. Loyssen
Basrskaat 35
8647 Lo Rermge
BELGIUM

Eliane Dewit
Hubert Alexandre
Schrikstraat 13
3110 Rotselaar
BELGIUM

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Emmanuel Dhondt and Annie Laurent
Immerzeeldreef 201
9300 Aalst
BELGIUM

RECEIVED CONSENT TO EMAIL SERVICE

J.R. Dhont
Walstraat 32
2070 Zwijndrecht
BELGIUM

RECEIVED CONSENT TO EMAIL SERVICE

Diericx Luciaan - Monique Sergeant
Constant Dermekelaan 44
9830 Malvens Latem
BELGIUM

RECEIVED CONSENT TO EMAIL SERVICE

H. Dixon & R.A. Omar
Charloisse Lagedijk 624
384LH Rotterdam
THE NETHERLANDS

RECEIVED CONSENT TO EMAIL SERVICE

J.B. Drenth
Verlengde Hanckemalaan 35
NL-9801LH Zuidhorn
THE NETHERLANDS

RECEIVED CONSENT TO EMAIL SERVICE

Simon Duif
Benedenweg 120
1834 AM St. Pancras
THE NETHERLANDS

RECEIVED CONSENT TO EMAIL SERVICE

YF Martinus Duif
Benedenweg 148
1834 AM St. Pancras
THE NETHERLANDS

RECEIVED CONSENT TO EMAIL SERVICE

Simon Duif and Joke Klaver
Benedenweg 120
1834 AM Sint Pancras
THE NETHERLANDS

RECEIVED CONSENT TO EMAIL SERVICE

A.L. Duijvestein
Watertorenlaan 60
2275 AX Voorburg
THE NETHERLANDS

RECEIVED CONSENT TO EMAIL SERVICE

Philippe Dumoulin
137 Rue Pairelle 137
B-5651 Thy-le-chateau
BELGIUM

RECEIVED CONSENT TO EMAIL SERVICE

Yf Martinus Duijff and Triintie Reine
Benedenweg 148
1834 Am Sint Pancras
THE NETHERLANDS

RECEIVED CONSENT TO EMAIL SERVICE

Brett A Elam Esq.
Brett A. Elam, P.A.
105 S. Narcissus Avenue
Suite 802
West Palm Beach, FL 33401-5530

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Elhamo Beheer B.V.
Bergweg 8
3956 Bj Leersum
THE NETHERLANDS

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Engineering & Marketing Consult Co Ltd
POB 93435
250GAK The Hague
THE NETHERLANDS

RECEIVED CONSENT TO EMAIL SERVICE

MC Feijen
H De Keyzerlaan 29A
5622 El Eindhoven
THE NETHERLANDS

RECEIVED CONSENT TO EMAIL SERVICE

C.J. Fierloos
K. Fierloos-Van Der Shoor
Dorpszicht 25
4414 BL Waarde
THE NETHERLANDS

RECEIVED CONSENT TO EMAIL SERVICE

CJ Fierloos
DORPSZICHT 23
4414 BL WAARDE
THE NETHERLANDS

DUPLICATE

Fortry Rita
Molenstraat 118
9800 Deinze
BELGIUM

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Julianne R. Frank
Frank, White-Boyd, PA
11382 Prosperity Farms Rd., Ste. 230
Palm Beach Gardens, FL 33410-3463

WITHDREW FROM CASE

Gamlenisser Beheer BV
Mricptm Bakers
Onderstestraat 2
6301 KB Valkenburg
THE NETHERLANDS

RECEIVED CONSENT TO EMAIL SERVICE

H.E.J. Gerats
St Franciscusweg 69
NL 6416 EV Herflen
THE NETHERLANDS

RECEIVED CONSENT TO EMAIL SERVICE

Gerke Schutte Beheer
Marinaweg 69
1361 AG Almere Poort
THE NETHERLANDS

RECEIVED CONSENT TO EMAIL SERVICE

Geteco Holdings BV
St Franciscusweg 69
NL 6416 EV Heerlen
THE NETHERLANDS

RECEIVED CONSENT TO EMAIL SERVICE

Geul Beheer BV
Aletta Jacobskade 198
3137 TE-Vlaardingen
THE NETHERLANDS

RECEIVED CONSENT TO EMAIL SERVICE

F.R. Gevaerts
Westersingel 92
3015 LC Rotterdam
THE NETHERLANDS

RECEIVED CONSENT TO EMAIL SERVICE

Andre Martin Giltjes
Benedenweg 134
1834 AM Sint Pancras
THE NETHERLANDS

RECEIVED CONSENT TO EMAIL SERVICE

W. Godaert
Walstraat 32
Zwijndrecht -
BELGIUM 2070

RECEIVED CONSENT TO EMAIL SERVICE

Christiane Godefridis
Lovenjoelsestraat 71
3360 Bierbeek
BELGIUM

RECEIVED CONSENT TO EMAIL SERVICE

Albert Wouter Goetzee
Carrer Llobarro 5
03581 El Albir, Alfaz del Pi
SPAIN

RECEIVED CONSENT TO EMAIL SERVICE

H.P. Habets
Beukstraat 65
6121 KV Elsloo
THE NETHERLANDS

RECEIVED CONSENT TO EMAIL SERVICE

WL Hartevelt
Waterstaatspad 9
2292 DG Wateringen
THE NETHERLANDS

Eva K. Hasenhuttl
24 Governor's Court
Palm Beach Gardens, FL 33418-7159

John R. Haynie, Jr.
LIS
1500 W Cypress Creek Rd #408
Fort Lauderdale, FL 33309-1851

Rob Heijerman
NL-7122 BN, Aalten
THE NETHERLANDS

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Heinz Gunther Alfred Hermann Zorn
Wintertalinglaan 6
1343 AV Almere
THE NETHERLANDS

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J.H.M. Hendriks
Noordwykselaan 4
Gravenhage 2554 GC
THE NETHERLANDS

H.J.A. Hendriks/P.J.A.Schuermans
Molenmeesterstraat 16
2645 GW Delfgauw
THE NETHERLANDS

RECEIVED CONSENT TO EMAIL SERVICE

Visch Johannes Hendrikus
32 Quai Jean Charles Rey
MC98000
MONACO

RECEIVED CONSENT TO EMAIL SERVICE

Henricus Johannes Wilhelmus Maria
Diepstrate
c/o Harry Diepstraten
Blancefloerlaan 163 Bus 23
2050 Antwerpen
BELGIUM

Henricus Wilhelmus Antonius Smits
Blaarthemseweg 14a
5502JV Veldhoven
THE NETHERLANDS

Deneys Herman-Van Eeckhoudt
Christine
Kleistrakkt 4
A161 Roosdaal
BELGIUM

Maarlen Heunen
Op de Acher 13
Hoensbroeh
THE NETHERLANDS

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Anthonissen Heymans
Kortihnen 14
2470 Retie
BELGIUM

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Johanna A.M. Hiemstra
Tijm 8
1616 TB Hoogkarspel
THE NETHERLANDS

RECEIVED CONSENT TO EMAIL SERVICE

Wilhelmus Johannes Hoedemakers
Kapelaan Koopmansplein 123
5212 NW 's-Hertogenbosch
THE NETHERLANDS

H. Hollander
Meenwenweg 28
8218 NE Lelystad
THE NETHERLANDS

RECEIVED CONSENT TO EMAIL SERVICE

Johannis Honkoop/J.C.Honkoop
Wilgenlaan 178
Zwanenburg, NL 1161 JR
THE NETHERLANDS

Gilbert Hoogstoel/Liliane Langenaken
Monnikenstraat 28/A001
8433 Middelkerke
BELGIUM

John Hufkens
Herendaal 13
6228 GV Maashicht
THE NETHERLANDS

Bart Huyghe
Veldstraat 45 bus 2
8660 De Parre
BELGIUM

RECEIVED CONSENT TO EMAIL

Impeckt B.V
c/o H.Pekelharing
Van Ravesteynerf 443
3315 DT Dordrecht
THE NETHERLANDS

RECEIVED CONSENT TO EMAIL SERVICE

G.H.M. Janmaat
Paradijsweg 16
2461 TM TER AAR
THE NETHERLANDS

Paul Clement J. Jansegers
Pontweg 7
93 Herdersem
BELGIUM

RECEIVED CONSENT TO EMAIL SERVICE

Markus Johannes
De Pan 17
5527 JC
Hapert
THE NETHERLANDS

Philippus Johannes
Bongerd 1
3828 HW Hoogland
THE NETHERLANDS

Hendrik Joosten
Begynenweide 2
1967 HG Heemsuerk
THE NETHERLANDS

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Hendrik Joosten en Dieuwke Otten H.
Joosten
Begijnenweide 2
1967 HG Heemskerk
THE NETHERLANDS

Dom Roger Julien P - Callaert Lucia-
Joanna
Vooruitgangstraat, 7
2800 Mecheleh
BELGIUM

RECEIVED CONSENT TO EMAIL SERVICE

Soneet R Kapila
Kapila & Company
1000 S Federal Hwy #200
Ft. Lauderdale, FL 33316-1237

Jacomina Kars
Carr del Albir 13 2C
Altea 03590 Alicante
SPAIN

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Jurriaan D. Kasius
Van Keulendreef 57
2661 St Bergschenhoek
THE NETHERLANDS

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H.M.J. Kempen
Sleedoornlaan 59
5672 BM Nuenen
THE NETHERLANDS

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Mathias Christiaan Maria Kerres
JJAM Amkreutz Akerstraat 83
6417 Bj Heerlen
THE NETHERLANDS

Siem G. Knol
Nekkerweg 65
1461 Le Beemster
THE NETHERLANDS

RECEIVED CONSENT TO EMAIL SERVICE

Jan Koster
Nadirland 3
7904 9H Hogeveen
THE NETHERLANDS

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Hendrik Kramer
Verl Herewg 106
9722 AH Groningen
THE NETHERLANDS

Lammertijn-Lanssens Johny Krus
Nijverheidstraat 18
8780 Oostrozebeke
BELGIUM

I.S. Kuiper
Uiverdonk 22
5467 DZ Veghel
THE NETHERLANDS

Jennefer Kim Kuitwaard
Bovenweg 4
1834 CE Sint Pancras
THE NETHERLANDS

Jennerfer Kim Kultwaard
Bovenweg 4
1834 CE Sint Pancras
THE NETHERLANDS

A. Kwakernaak
Gravekoopse dijk 2
2811 NL Reeuwijk
THE NETHERLANDS

L.H.M. Dekkers Beheer B.V.
Kerkhoflaan 7
5582JH Waalre
THE NETHERLANDS

RECEIVED CONSENT TO EMAIL SERVICE

Rita Lauwers
Walstraat 32
Zwijndrecht -
BELGIUM 2070

Christiane Lecot
Helvetiastraat 45
8670 Koksijde
BELGIUM

Joanna Lefebvre Rene-Stevens
Marktstraat 123 Bus 202
8530 Harelbeke
BELGIUM

Anne-Marie Lefevre
Lindendreef 22
8630 Veurne
BELGIUM

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LHM Dekkers Beheer BV
Kerkhoflaan 7
5582 JH Waalre
THE NETHERLANDS

Jorg and Carola Liedtke
Blaakse Wetering 50
3176 XB Poortugaal
THE NETHERLANDS

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Andreas Johannes Limpens
Schaapherder 4
3834 CK Leusden
THE NETHERLANDS

Frank Loones
Koksijdesteenweg 9A
B8670 Koksijde
BELGIUM

Andries Louis
Lovenjoelsestraat 71
B-3360 Bierbeek
BELGIUM 33-401

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P. Louwaard (Exploitatie)
Looierstraat 35
6921 GR Duiven
THE NETHERLANDS

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Arnold, Peter, Michael, Maria Maas
Bovenderstraat 43
6447CD Merkelbeek
THE NETHERLANDS

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F.M.C. Maes & F.J.C. Maes
Pijlkruidstraat 34
2990 Wuustwezel
BELGIUM

Petrus Lambertus Carolus Maria
Nieuwkuijkseweg 11
5268 LH Helvoirt
THE NETHERLANDS

Oscar Martin-Riva
Calle Moralzarzal 61, 4-B
Madrid 28034
SPAIN

S.P.G. Mat
Walstraat 32
2070 Zwijndrecht
BELGIUM

Deborah Menotte
POB 211087
West Palm Beach, FL 33421-1087

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Michael L. Glaser, LLC
1720 South Bellaire Street
Suite 607
Denver, CO 80222-4331

NOT A CLAIMANT

Luc Michaux
Paasbloemstraat 27
B-2170 Merksem
BELGIUM

Luc L.A.Michaux
Els D J Hendricks
Paasbloemstraat 27
B2170 Merksem
BELGIUM

Paul Michiels/Irene Stynen
Sint Gerebemosstraat 36
8-2440 Geel
BELGIUM

Hilde Moens
Ninovesteenweg 960 buf II
9320 Erembodegem, Belgium

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Hilde Moens
Walstraat 32
2070 Zwijndrecht
BELGIUM

Anne Monsieur
Zuidwesterstraat 12
8670 Koksijde-Oostduinkerke
BELGIUM

Patrick Mortier
Capucijnenlaan 34
8670 Koksijde
BELGIUM

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Mulder, Bertus and Vrasdonk
Hoofdweg 615
2131 BA Hoofddorp
THE NETHERLANDS

N.P.P.M. Mutsaers and C.N.F.J. Mutsaers
Ridderspoorhof 28
3355 BG Papendrecht
THE NETHERLANDS

Tjeerd A.B. Nauta
Jan Van Ruusbroeciaan 4
2343 JL Oegstgeest
THE NETHERLANDS

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Jurgen P.S. Nel
Nijkerkerweg 1
3751 XA Bunschoten
THE NETHERLANDS

Jenny Nicole Stragier
Zuidkaai Al
BE-8870 Izegem
BELGIUM

Eddy Noppe
Kustlaan Ng 16
8300 Knokke
BELGIUM

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Office of the U.S. Trustee
51 S.W. 1st Ave. Suite 1204
Miami, FL 33130-1614

H.W. Olij
Achterweg 69
1424 PP De Kwakel
THE NETHERLANDS

Onderwater Beheer BV
John Onderwater, Director
Westeinde 339a
1647 MT Berkhout
THE NETHERLANDS

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Richard Gerhard Oost
Stationsweg 5
8096 AV Oldebroek
THE NETHERLANDS

Oost en West Beheer BV
Wellseindsedijk 2
5325 KD Well
THE NETHERLANDS

Oostwouder Beheer BV
Mr O. Oostwouder
Jeweldijk 1A
1759 JC Callantsoog
THE NETHERLANDS

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Peter H.M.A. Ortmans
c/o Daniel Gold
501 Brickell Key Drive, Suite 300
Miami, FL 33131-2624

Peter H.M.A. Ortmans
Doornstraat 2
B-3630 Maasmechelen
BELGIUM

Erik Panen
De Pont 28
Schilde 2970
BELGIUM

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Parcside Equity, LLC
c/o Akerman Senterfitt
350 E. Las Olas Blvd - #1600
Fort Lauderdale, FL 33301-4247

Partech Participatie Holding BV
EJ Homan
Laan Der Verenigde Naties 70
231466 Leiden
THE NETHERLANDS

Steenbeke Pascal
Molenstraat 130
9800 Deinze - Petegem
BELGIUM

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Anna Maria Pauwels
Korte Heusstraat 66
1980 Zemst
BELGIUM

Peirs DWPWG
Vaartlaam 26
9800 Deinze
BELGIUM

Dirk Peten
Mastenstraat 91
2400 MOL
BELGIUM

RECEIVED CONSENT TO EMAIL SERVICE

Troels Henning Peterson and Lene
Petersen
CV 425, km 29,5 Venta de Gaeta
E-46199 Cortes de Pallas
Valencia
SPAIN

Florizoone Philippe
Kowiwkizke B66n
B-8670 Kokfyde
BELGIUM

MAIL RETURNED

Pien Beheer B.V.
P. Bruijstens
Bosrand 144
5665 Et Geldrop
THE NETHERLANDS

RECEIVED CONSENT TO EMAIL SERVICE

Wilfred Jacob Pinkster
Drift 3
3512 BP Utrecht
THE NETHERLANDS

Nicolaas Ploeg and Catharina SM Ruhe
Moerverweg 148
1834 ER Sint Pancras
THE NETHERLANDS

Quality Investments
rs S.P.G.MAT
Geneesheerstraat 6
1560 Hoeilaart
BELGIUM

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Brigitte Raman
Steenvoordestraat 141
B9070 Heusden
BELGIUM

Stephen Redshaw
Wilmenweg 35
6447 AW Merkelbeek
THE NETHERLANDS

Klaas Reijerkerk
Houtkopersstraat 16
3334 KD Zwisndrecht
THE NETHERLANDS

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Johan Remmery
Elbestraat 61
8760 Meulebeke
BELGIUM

Daniela Ribeiro
2246 Quail Ridge S.
Palm Beach Gardens, FL 33418-3535

Cornelius Ripping
Overgauwseweg 48
2641 NG Pynacker
THE NETHERLANDS

NOT A CLAIMANT

RECEIVED CONSENT TO EMAIL SERVICE

Barbera-Hendrika Ripping-Drapers
Overgauwseweg 48
2641 NG Pynacker
THE NETHERLANDS

Martina CM. Rombaut
Hekkerstraat 35
3908 Hofstade, Aalst, Belgium

J.C. Roodzant
Noorddijk 16
3247 LC Dirksland
THE NETHERLANDS

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Rush JJAG
Mr GA Oevri
Am Buhel 1
9493 Mauren FL
LIECHTENSTEIN

M.J.F. Rykers
De Pan 17
5527 JC Hapert
THE NETHERLANDS

Sage Systems, LLC
3741 NE 60th Court
Silver Springs, FL 34488-1931

Salescoach BV
Wassenaarseweg 75 - 356C
2223 La Katwijk
THE NETHERLANDS

Pieter Jan Willem Schaffels
Nienne Hilveesumseweg 49A
1406 TD Bussum
THE NETHERLANDS

Schaffels Beheer BV
PJW Schaeffels
Nicuwa Hilversumscweg
Uga 1406TD Bussum
THE NETHERLANDS

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J.J.M. Schaumans
Walstraat 32
2070 Zwijndrecht
BELGIUM

M.A.G. Scheijven
Mertensstraat 7
6031 HB Meester
THE NETHERLANDS

Simonna Schellinck
Hertshage 60
9300 AALST
BELGIUM

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Cecilia Leonarda Schmeitz
St Lambertuslaan 6
6211 KB Maastricht
THE NETHERLANDS

Robert Schouten
Jachtlaan 2
3958EJ Amerongen
THE NETHERLANDS

Gerke Schutte
c/o Kenneth B. Robinson, Esq.
Rice Pugatch Robinson & Schiller, P.A.
101 N.E. Third Avenue, Suite 1800
Ft. Lauderdale, FL 33301-1252

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Maria Emiel C. Slachmuylders
Tiensesteenweg 112, Bus 4
B 3360 Bierbeek
BELGIUM

Margaret Smith
c/o Leyza F. Blanco, Esq.
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Margaret J. Smith as Trustee
For Bankruptcy Case #14-14507
1101 Brickell Ave #S503
Miami, FL 33131-3110

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NO LONGER TRUSTEE OF INDIV. CASE

NO LONGER TRUSTEE OF INDIV. CASE

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P.P.M.L. Stassen
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MAIL RETURNED AS UNDELIVERABLE

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Mr. Johan D. Kleijn
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REQUESTED EMAIL SERVICE

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