

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 STIPULATION FOR COMPROMISE AND
SETTLEMENT AMONG (I) DEBORAH C. MENOTTE, TRUSTEE; (II) WIM SCHAAP;
(III) SCHAPIE SCHAPIE PENSIOEN B.V.; AND (IV) W. SCHAAP HOLDING
BUNSCHOTEN B.V.**

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 9013-1(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 Stipulation for Compromise and Settlement Among (I) Deborah C. Menotte, Trustee; (II) Wim Schaat; (III) Schapie Schapie Pensioen B.V.; and (IV) W. Schaat Holding Bunschoten B.V.* (the “Motion”), pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure, seeking approval of a compromise and settlement between (i) the Trustee; (ii) Wim Schaat; (iii) Schapie Schapie Pensioen B.V.; and (iv) W. Schaat Holding Bunschoten B.V. (collectively, with the Trustee, “the Parties”), and in support 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 October 2, 2013, this Court entered an *Order Granting Trustee’s Second Amended Motion for Substantive Consolidation of the Jointly Administered Bankruptcy Estates* [ECF No. 561] (the “Sub Con Order”), which order served to substantively consolidate the Affiliates and certain non-debtor entities (“Non-Debtor Entities”) with the Debtor, including Peck Associates Palm Beach, LLC d/b/a Deborah C. Peck, P.A. (“Peck PA”).

5. On March 1, 2014, BV Schapie Schapie Pensioen (“Schapie”) filed a Proof of Claim (“Claim No. 587-1) in the Debtors’ consolidated bankruptcy estate, as an unsecured, non-priority claim in the amount of \$119,073.00.

6. On March 3, 2014, W.A.P. Schaap (“Schaap”) filed a Proof of Claim (“Claim No. 985-1”) in the Debtors’ consolidated bankruptcy estate, as an unsecured, non-priority claim in the amount of \$516,890.00.

7. On March 5, 2014, the Trustee made demand in writing upon Schaap for the recovery of monies paid to Schaap within the four year period preceding the Petition Date totaling \$211,965.00 (the “Transfers”), which the Trustee believes were made with the actual intent to hinder, delay or defraud a creditor of the Debtors, or for which the Debtors did not

receive reasonably equivalent value, pursuant to 11 U.S.C. § 544, 548 and 550, and Chapter 726 of the Florida Statutes.

8. On May 22, 2014, Schaap, through counsel, responded to the demand letter, and asserted certain defenses to the Transfers.

Settlement and Compromise

9. In the interest of avoiding further costly and time-consuming litigation, the Trustee, Schaap and Schapie have agreed to settlement of their disputes, and the Parties have entered into a *Stipulation for Compromise and Settlement Among (I) Deborah C. Menotte, Trustee; (II) Wim Schaap; (III) Schapie Schapie Pensioen B.V.; and (IV) W. Schaap Holding Bunschoten B.V.* (the “Stipulation”), a copy of which is attached hereto as **Exhibit “A”** and is subject to the approval of this Court after notice and hearing.

10. Through this Motion, the Parties seek to resolve all disputes between them, upon the following terms and conditions as set forth in the Stipulation:¹

a. On or before July 11, 2014, Schaap shall pay to the Trustee, a lump sum payment of \$25,000.00 (USD) (the “Settlement Amount”). The Settlement Amount shall be payable in U.S. Dollars, shall be made payable by wire transfer, attorneys’ trust account check, or other form of immediately available funds, shall be made payable to Berger Singerman LLP Trust Account, and forwarded to Berger Singerman LLP, 1450 Brickell Avenue, Suite 1900, Miami, FL 33131, Attn: Deborah B. Talenfeld, Esq.;

b. Schaap shall amend Claim No. 985-1 filed by Schaap, so as to reduce the total amount of the claim from \$516,890.00 to \$235,891.00;

¹ In the event of any inconsistency between the description of the Stipulation in the body of this motion, and the Stipulation itself, attached as Exhibit A, the terms of the Stipulation shall control.

c. Schaap shall amend Claim No. 587-1 filed by Schapie, so as to reduce the total amount of Claim No. 587-1 from \$119,073.00 to \$111,711.00;

d. The Trustee agrees not to object to Claim Nos. 587-1 and 985-1, as amended as set forth in paragraphs b and c above;

e. Upon the Trustee's timely receipt and clearance of the Settlement Amount, and the filing of amendments to Claim Nos. 587-1 and 985-1, as set forth in the Stipulation, the Trustee shall release W.A.P. Schaap, W. Schaap Holding (Bunschoten B.V.) and Schapie Schapie Pensioen B.V. from any and all further liability to the Debtors' estates. Further, Schaap, Schapie and W. Schaap Holding (Bunschoten B.V.) agree to release and hold harmless the Trustee, agents of the Trustee, the Debtors' estates, successors-in-interest to the Debtors, any assignees of the Debtors, agents of the Debtors, Directors and Officers of the Debtors or former Directors and Officers of the Debtors based on any transactions or dealings between the Parties.

11. The Parties believe that the Stipulation is in the best interests of Schaap, Schapie and W. Schaap Holding (Bunschoten B.V.) and the Debtors' estates. Accordingly, by this Motion, the Trustee requests the entry of an Order approving the Stipulation in its entirety, after notice to creditors and parties in interest.

Legal Analysis

12. The Trustee seeks approval of the Stipulation pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure.

13. 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).

14. 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.

15. 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.

16. The Stipulation satisfies the *Justice Oaks* standard.

17. Applying the foregoing, the terms of the Stipulation satisfy that four-part test relating to the Rule 9019 request. The Trustee believes that notwithstanding the likelihood of success in potential litigation, the expense, inconvenience and delay that would be caused by litigating and the uncertainty of the collection of the monies owed would not be in the best

interests of the Debtors' estate. Therefore, it is the belief of the Trustee that after full and careful consideration of the merits of the Trustee's claims, settlement of the claims pursuant to the terms set forth herein and in the Stipulation would be in the best interests of the Debtors' estates.

18. Additionally, counsel for the Trustee is mindful of the additional administrative expenses that will be incurred in the event that the Stipulation is not approved. The Trustee believes that resolution of the above-referenced matters in the manner set forth herein and in the Stipulation 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 Stipulation in its entirety, in the event that no written objections are filed within the time prescribed by Local Rule 9013-1(D); 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 9th day of July, 2014, via electronic transmission through the Court's CM/ECF system upon all parties on the attached CM/ECF Service List; via electronic service upon all parties on the List of Creditors Who Have Consented to Electronic Service; via first class, U.S. Mail upon creditors and interested parties on the attached Matrix (to the extent that such parties are not receiving

service electronically as set forth herein); and via first class, U.S. Mail upon all parties listed below.

Dated: July 9, 2014

Respectfully submitted,

BERGER SINGERMAN LLP
Counsel for the Trustee
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By: /s/ Deborah B. Talenfeld

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LIST OF CREDITORS WHO HAVE CONSENTED TO ELECTRONIC SERVICE

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Paulus	Alsemgeest	p.alsemgeest@upcmail.nl	08/18/2013	Wormwood Beheer BV
Louis Jozef M.	Andries	louis.andries@andrieskeukens.be	08/21/2013	
Elly C.	Bakker	elly.bakker@planet.nl	08/22/2013	
Maria	Barnhoorn-Blankers	kees@casema.nl	08/20/2013	
Robert M.W.H.	Bedaux	kantoor@bedaux.org	08/22/2013	
Joseph N.	Besseling	jos@besseling.be	08/20/2013	
Antoon	Biemans	antoonbiemans@ziggo.nl	08/17/2013	
Martine Jacqueline	Bogaert	mj.bogaert@gmail.com	08/24/2013	
Jeff A.J.	Bolders	jeff.bolders@planet.nl	08/22/2013	
Maikel	Bongers	maikel.bongers@gmail.com	08/20/2013	
Maikel	Bongers	m.bongers14@upcmail.nl	08/21/2013	
John	Boot	info@myprivatehotspot.com	08/23/2013	Address updated per 09-11-2013 emailed request.
Theo M.	Botden	Thm.botden@gmail.com	08/21/2013	Email changed from tbotden@xs4all.nl on 12/27/13 per email from Theo Botden.
Barry (Gijsbert)	Broere	barry.broere@gmail.com	01/08/2014	Also on Foreign Investor matrix.
Simonne Eveline E.	Caeldries	debbie.thuysbaert@skynet.be	01/16/2014	In care of her niece (Debbie Thuysbaert), at the direction of Katrien Verhofstadt (katrien.verhofstadt@crelan.be)
William	Cortvriendt	williamcor@telefonica.net	04/17/2014	Also in Foreign Investor matrix.
Wim A.M.	de Boer	wim@zen.nl	09/02/2013, 04/17/2014	

First Name	Last Name	Email Address	Date Consented to Email Service	Additional Info or Comment
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Jan	De Schepper	jds@revius.be	06/30/2014	
Lucien (Ann)	De Vos	ann.devos@ducavo.be	09/24/2013	Also in Foreign Investor Matrix (Doc # 4855751)
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First Name	Last Name	Email Address	Date Consented to Email Service	Additional Info or Comment
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First Name	Last Name	Email Address	Date Consented to Email Service	Additional Info or Comment
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REQUESTED TO BE REMOVED

EXHIBIT “A”

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

In re:

CLSF III IV, INC., et al.

Case No.: 12-30081-BKC-EPK
Chapter 7
(Substantively Consolidated)

Debtor.

STIPULATION FOR COMPROMISE AND SETTLEMENT AMONG (I) DEBORAH C. MENOTTE, TRUSTEE; (II) WIM SCHAAP; (III) SCHAPIE SCHAPIE PENSIOEN B.V.; AND (IV) W. SCHAAP HOLDING BUNSCHOTEN B.V.

THIS STIPULATION OF SETTLEMENT (the “Stipulation”) is entered on the dates stated below, by and among (i) Deborah C. Menotte, the Chapter 7 Trustee (the “Trustee”) of the estates of CLSF III IV, Inc., *et al.* (Case No.: 12-30081-BKC-EPK); (ii) Wim Schaap; (iii) Schapie Schapic Pensioen B.V.; and (iv) W. Schaap Holding Bunschoten B.V. (collectively, the “Parties”). The Parties recite as follows:

WHEREAS, on August 22, 2012, the above-captioned bankruptcy case was commenced against CLSF III IV, Inc. (the “Debtor”) by the filing of an involuntary petition for relief in this Court under Chapter 7 of the Bankruptcy Code.

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

WHEREAS, on October 2, 2013, this Court entered an *Order Granting Trustee’s Second Amended Motion for Substantive Consolidation of the Jointly Administered Bankruptcy Estates* [ECF No. 561] (the “Sub Con Order”), which order served to substantively consolidate the Affiliates and certain non-debtor entities (“Non-Debtor Entities”) with the Debtor, including Peck Associates Palm Beach, LLC d/b/a Deborah C. Peck, P.A. (“Peck PA”).

WHEREAS, the Debtor, the Affiliates, the Non-Debtor Entities, and Peck PA are collectively referred to as the “Debtors.”

WHEREAS, on March 1, 2014, Schapie Schapie Pensioen B.V. (“Schapie”), a Dutch private company of which Wim Schaap is the sole shareholder and managing director, filed a Proof of Claim (“Claim No. 587-1) in the Debtors’ consolidated bankruptcy estate, as an unsecured, non-priority claim in the amount of \$119,073.00.



WHEREAS, on March 3, 2014, Wim Schaap (“Schaap”) filed a Proof of Claim (“Claim No. 985-1”) in the Debtors’ consolidated bankruptcy estate, as an unsecured, non-priority claim in the amount of \$516,890.00.

WHEREAS, W. Schaap Holding Bunschoten B.V. (“Schaap Holding”) is a Dutch private company of which Wim Schaap is the sole board member and ultimate beneficial owner of the financial rights related to all outstanding shares.

WHEREAS, Schaap, Schapie, and Schaap Holding are collectively referred to as the “Schaap Creditors.”

WHEREAS, on March 5, 2014, the Trustee made demand in writing upon Schaap for the recovery of monies paid to Schaap within the four year period preceding the Petition Date totaling \$211,965.00 (the “Transfers”), which the Trustee believes were made with the actual intent to hinder, delay or defraud a creditor of the Debtor, or for which the Debtor did not receive reasonably equivalent value, pursuant to 11 U.S.C. § 544, 548 and 550, and Chapter 726 of the Florida Statutes.

WHEREAS, on May 22, 2014, Schaap, through counsel, responded to the demand letter and (1) denied the Transfers were made with the actual intent to hinder, delay or defraud a creditor of the Debtor, or for which the Debtor did not receive reasonably equivalent value; and (2) asserted certain defenses to the Transfers.

WHEREAS, in the interest of avoiding further costly and time-consuming litigation, the Trustee and the Schaap Creditors have agreed to the terms set forth in this Stipulation;

NOW, THEREFORE, in consideration of the premises, and for other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the Parties hereto, intending to be legally bound, hereby agree as follows:

1. The Parties agree that the above recitations are true and correct.

2. On or before July 11, 2014, Schaap shall pay to the Trustee, a lump sum payment of \$25,000.00 (USD) (the “Settlement Amount”). The Settlement Amount shall be payable in U.S. Dollars by wire transfer, attorneys’ trust account check, or other form of immediately available funds, to Berger Singerman LLP Trust Account, and forwarded to Berger Singerman LLP, 1450 Brickell Avenue, Suite 1900, Miami, FL 33131, Attn: Deborah B. Talenfeld, Esq.

3. Schaap shall amend Claim No. 985-1 filed by Schaap, so as to reduce the total amount of the claim from \$516,890.00 to \$235,891.00.

4. Schaap shall amend Claim No. 587-1 filed by Schapie, so as to reduce the total amount of Claim No. 587-1 from \$119,073.00 to \$111,711.00.

5. The Trustee agrees not to object to Claim Nos. 587-1 and 985-1, as amended as set forth in paragraphs 3 and 4 above.



6. Upon the Trustee's timely receipt and clearance of the Settlement Amount, and the filing of amendments to Claim Nos. 587-1 and 985-1, as set forth in this Stipulation, the Trustee, the agents of the Trustee, the Debtors' estates, successors-in-interest to the Debtors, any assignees of the Debtors, agents of the Debtors, Directors and Officers of the Debtors or former Directors and Officers of the Debtors based on any transactions or dealings between the Parties shall release the Schaap Creditors their officers, directors, employees, agents, attorneys, affiliates, subsidiaries, beneficiaries and assigns from any and all claims, demands and causes of action, and defenses of any kind or nature whatsoever, in law or in equity, including, without limitation, costs, expenses, penalties, and attorneys' fees, known or unknown including but not limited to those arising out of or in connection, directly or indirectly, with the above-captioned Bankruptcy proceeding, including without limitation, any potential claims under Sections 544, 548 and 550 of the United States Bankruptcy Code and Chapter 726 of the Florida Statutes and any other provisions of the United States Bankruptcy Code and/or Florida state law. This release applies to all past and present claims, known or unknown based on any transactions or dealings between the Parties. THIS IS INTENDED TO BE A FULL, COMPLETE AND UNCONDITIONAL RELEASE.

7. Further, the Schaap Creditors their officers, directors, employees, agents, attorneys, affiliates, subsidiaries, beneficiaries and assigns agree to release and hold harmless the Trustee, agents of the Trustee, the Debtors' estates, successors-in-interest to the Debtors, any assignees of the Debtors, agents of the Debtors, Directors and Officers of the Debtors or former Directors and Officers of the Debtors from any and all claims, charges, actions, causes of action, and defenses of any nature whatsoever, in law or in equity, including, without limitation, costs, expenses, penalties, and attorneys' fees, known or unknown including but not limited to those arising out of or in connection, directly or indirectly, with the above-captioned Bankruptcy proceeding. This release applies to all past and present claims, known or unknown based on any transactions or dealings between the Parties. THIS IS INTENDED TO BE A FULL, COMPLETE AND UNCONDITIONAL RELEASE.

8. The Parties believe that the Stipulation is in the best interests of Schaap, Schapie and Schaap Holding and the Debtors' estates.

9. The Parties shall cooperate in the consummation of the settlement and in the preparation and execution of any and all documents necessary to carry out the intent and purpose of this Stipulation.

10. This Stipulation shall be binding upon and inure to the benefit of the Parties hereto and their successors, successors-in-interest, and assigns, including any reorganized entity or any trustee that may be appointed or elected pursuant to the Bankruptcy Code in this or any superseding case.

11. This Stipulation shall not be construed against any Party as an admission of liability or concession of any matters, except as to those specific agreements contained herein.

12. This Stipulation shall be construed and governed by the laws of the State of Florida to the extent state law is applicable.

13. This Stipulation constitutes the entire agreement by and between the Trustee and the Schaap Creditors with respect to all issues raised, or that could have been raised, regarding alleged fraudulent transfers by the Debtor to Schaap.

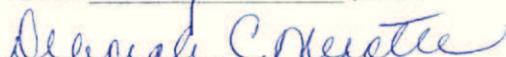
14. The Parties hereby acknowledge that there are no communications or oral understandings contrary to or different from this Stipulation.

15. The Parties shall request that the Bankruptcy Court retain jurisdiction to enforce and construe the provisions of this Stipulation. The Parties consent to the Bankruptcy Court's exercise of personal and subject matter jurisdiction (including "core" jurisdiction) to adjudicate any disputes that might arise under this Stipulation.

16. The Stipulation may be executed in one or more counterparts, each counterpart to be considered an original portion of this Stipulation and all of which shall constitute a singular instrument.

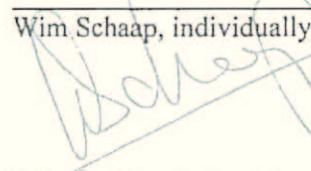
17. Each Party to this Stipulation represents and warrants that it is duly authorized to execute this Stipulation and that the person through whom each Party executes this Stipulation is fully and duly empowered and authorized to execute it on the respective Party's behalf.

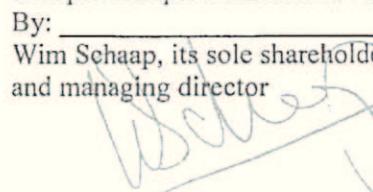
Dated: July 7, 2014

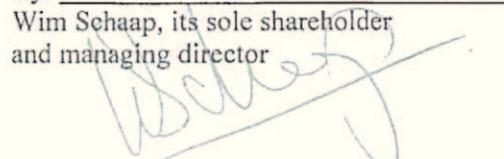


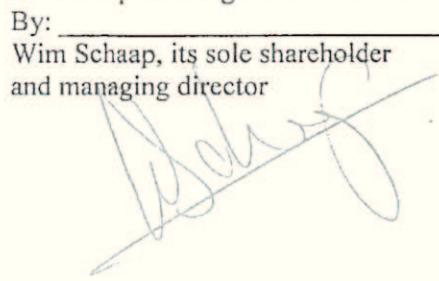
Deborah C. Menotte, Chapter 7 Trustee
for the estates of CLSF III IV, Inc., et al.

Dated: 24 juni, 2014


Wim Schaap, individually


Schapie Schapie Pensioen B.V.

By: 
Wim Schaap, its sole shareholder
and managing director


W. Schaap Holding Bunschoten B.V.

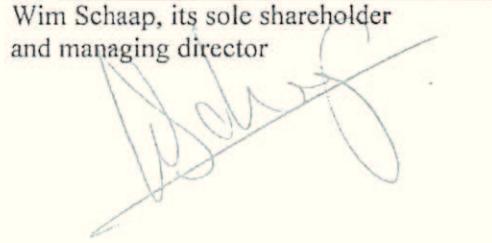
By: 
Wim Schaap, its sole shareholder
and managing director

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

Debtors.

(Substantively Consolidated)

**ORDER GRANTING TRUSTEE'S MOTION TO APPROVE STIPULATION FOR
COMPROMISE AND SETTLEMENT AMONG (I) DEBORAH C. MENOTTE,
TRUSTEE; (II) WIM SCHAAP; (III) SCHAPIE SCHAPIE PENSIOEN B.V.; AND (IV)
W. SCHAAP HOLDING BUNSCHOTEN B.V.**

THIS CASE having come before the Court upon the *Trustee's Motion to Approve Stipulation for Compromise and Settlement Among (I) Deborah C. Menotte, Trustee; (II) Wim Schaat; (III) Schapie Schapie Pensioen B.V.; and (IV) W. Schaat Holding Bunschoten B.V.* (the "Motion") [ECF No. ____]. The Court, having considered the Motion, the Court file and the *Stipulation for Compromise and Settlement Between (I) Deborah C. Menotte, Trustee; and (II) Wim Schaat; (III) Schapie Schapie Pensioen B.V.; and (IV) W. Schaat Holding Bunschoten B.V.* (the "Stipulation") 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 filed on July ___, 2014 [ECF No. ____], and being otherwise fully advised in the premises, does thereupon

1. The Motion is **GRANTED**.
2. The Stipulation¹ is **APPROVED** in its entirety.
3. The Parties are authorized and directed to comply with the terms of the Stipulation, and the Court retains jurisdiction to enforce the terms thereof.

#

Submitted by:

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Copy furnished to:

Deborah B. Talenfeld, Esq.
(Attorney Talenfeld is directed to serve a conformed copy of this Order upon all interested parties, and to file a Certificate of Service with the Court).

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