

5. The discussions between the Plan Administrator and Cellco have concluded and Cellco has represented to the Plan Administrator that it now consents to the entry of an order on the Omnibus Objection that disallows the claims of Cellco.

6. The Plan Administrator has revised the order submitted with the Omnibus Objection to include only the claims of Cellco. A copy of this order is attached hereto as **Exhibit A** (the “Proposed Supplemental Order”).

7. A copy of the Proposed Supplemental Order marked to show changes from the Initial Order is attached hereto as **Exhibit B**.

WHEREFORE, the Plan Administrator respectfully requests that the Court enter the Proposed Supplemental Order attached hereto as **Exhibit A** at its earliest convenience.

Dated: May 9, 2024
Wilmington, Delaware

/s/ Michael W. Yurkewicz

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EXHIBIT A

Proposed Supplemental Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
PGX HOLDINGS, INC, <i>et al.</i> , ¹)	Case No. 23-10718 (CTG)
)	
Debtors.)	(Jointly Administered)
)	
)	Related to Docket Nos. 743, 794
)	
)	

**SUPPLEMENTAL ORDER SUSTAINING PLAN
ADMINISTRATOR’S SECOND OMNIBUS OBJECTION
(SUBSTANTIVE) TO CERTAIN CURED CLAIMS AND WARN CLASS CLAIMS**

Upon the objection (the “Objection”)² of the Plan Administrator seeking entry of an order modifying or expunging certain Disputed Claims ; and it appearing that the Court has jurisdiction over this matter pursuant to 28 U.S.C. §1334; and it appearing that this is a core proceeding pursuant to 28 U.S.C. §157; and it appearing that venue of this proceeding is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409; and the Plan Administrator, on behalf of the Debtors, having consented to the Court’s entry of a final order consistent with Article III of the United States Constitution; and adequate notice of the Objection and opportunity for response having been given; and it appearing that no other notice need be given; and the Court having considered the Objection, the Disputed Claims listed on **Schedule 1** annexed hereto, and any responses thereto;

1 The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: PGX Holdings, Inc. (2510); Credit Repair UK, Inc. (4798); Credit.com, Inc. (1580); Creditrepair.com Holdings, Inc. (7536); Creditrepair.com, Inc. (7680); eFolks Holdings, Inc. (5213); eFolks, LLC (5256); John C. Heath, Attorney At Law PC (8362); Progrexion ASG, Inc. (5153); Progrexion Holdings, Inc. (7123); Progrexion IP, Inc. (5179); Progrexion Marketing, Inc. (5073); and Progrexion Teleservices, Inc. (5110). The location of the Debtors’ service address for purposes of these chapter 11 cases is: 257 East 200 South, Suite 1200, Salt Lake City, Utah 84111.

2 Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Objection.

and upon the record herein; and after due deliberation and sufficient cause appearing therefore, it is FOUND AND DETERMINED that:

- A. This Objection is a core proceeding under 28 U.S.C. § 157(b)(2).
- B. Each holder of a Claim listed on **Schedule 1** attached hereto was properly and timely served with a copy of the Objection, this order (this "Order"), the accompanying exhibits, and the notice.
- C. Any entity known to have an interest in the Disputed Claims subject to the Objection has been afforded reasonable opportunity to respond to, or be heard regarding, the relief requested in the Objection.
- D. Each of the Cured Claims on **Schedule 1** hereto asserts a liability that was cured in connection with the Sale Transactions.

IT IS HEREBY ORDERED ADJUDGED AND DECREED that:

- 1. This order is supplemental to the Order Sustaining Plan Administrator's Second Omnibus Objection (Substantive) to Certain Cured Claims and WARN Class Claims entered at docket number 794, which is unaffected by the entry of this order.
- 2. The Objection is sustained as set forth herein.
- 3. Any response to the Objection not otherwise withdrawn, resolved, or adjourned is hereby overruled on its merits.
- 4. Each of the Cured Claims listed as an objectionable Claim on **Schedule 1** hereto is disallowed.
- 5. The official claims register in these cases shall be modified in accordance with this Order.

6. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in this Order shall be deemed: (a) an admission as to the validity of any prepetition Claim against a Debtor entity; (b) a waiver of the Debtors' right to dispute any prepetition Claim on any grounds; (c) a promise or requirement to pay any prepetition Claim; (d) a request or authorization to assume any prepetition agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code; or (e) a waiver of the Debtors' rights under the Bankruptcy Code or any other applicable law.

7. The Debtors' and Plan Administrator's rights to amend, modify, or supplement the Objection, and the rights of all parties in interest to file additional objections to the Disputed Claims or any other Claims (filed or not) which may be asserted against the Debtors, and to seek further reduction of any Disputed Claim to the extent such Claim has been paid, are preserved. Additionally, should one or more of the grounds of objection stated in the Objection be dismissed, the Debtors' rights, the Plan Administrator's rights, and the rights of other parties in interest to object on the other stated grounds or on any other grounds that the Debtors or other parties in interest may discover during this case are further preserved.

8. Each Disputed Claim, and the objections by the Debtors to such Disputed Claim, as addressed in the Objection and set forth on **Schedule 1** hereto, constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014 and Local Rule 3007-1. This Order shall be deemed a separate Order with respect to each Disputed Claim. Any stay of this Order pending appeal by any claimants whose Claims are subject to this Order shall only apply to the contested matter that involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

9. Notwithstanding the possible applicability of Bankruptcy Rules 6004, 7062, 9014 or otherwise, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

10. This Court shall retain jurisdiction over the Debtors and the claimants whose Claims are subject to the Objection with respect to any matters related to or arising from the Objection and the implementation of this Order.

Schedule 1

Cured Claims

PGX Holdings, Inc. Case No. 23-10718
 Second Omnibus Objection (Substantive)
 Schedule 1 - No Liability - Cured Contract Claims

NAME	DATE FILED	CASE #	DEBTOR	CLAIM #	CLAIM AMOUNT
1 CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS WILLIAM M VERMETTE 22001 LOUDOUN COUNTY PKWY ASHBURN, VA 20147	08/25/2023	23-10718	PGX Holdings, Inc.	221	\$8,189.63
Reason: Claimant has consented to the disallowance of this claim as cured.					
				TOTAL	\$8,189.63

EXHIBIT B

Redlined Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
PGX HOLDINGS, INC, <i>et al.</i> , ¹)	Case No. 23-10718 (CTG)
)	
Debtors.)	(Jointly Administered)
)	
)	Related to Docket Nos. 743, 794
)	

**SUPPLEMENTAL ORDER SUSTAINING PLAN
ADMINISTRATOR’S SECOND OMNIBUS OBJECTION
(SUBSTANTIVE) TO CERTAIN CURED CLAIMS AND WARN CLASS CLAIMS**

Upon the objection (the “Objection”)² of the Plan Administrator seeking entry of an order modifying or expunging certain Disputed Claims ; and it appearing that the Court has jurisdiction over this matter pursuant to 28 U.S.C. §1334; and it appearing that this is a core proceeding pursuant to 28 U.S.C. §157; and it appearing that venue of this proceeding is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409; and the Plan Administrator, on behalf of the Debtors, having consented to the Court’s entry of a final order consistent with Article III of the United States Constitution; and adequate notice of the Objection and opportunity for response having been given; and it appearing that no other notice need be given; and the Court having considered the Objection, the Disputed Claims listed on Schedule 1 ~~and Schedule 2~~

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: PGX Holdings, Inc. (2510); Credit Repair UK, Inc. (4798); Credit.com, Inc. (1580); Creditrepair.com Holdings, Inc. (7536); Creditrepair.com, Inc. (7680); eFolks Holdings, Inc. (5213); eFolks, LLC (5256); John C. Heath, Attorney At Law PC (8362); Progrexion ASG, Inc. (5153); Progrexion Holdings, Inc. (7123); Progrexion IP, Inc. (5179); Progrexion Marketing, Inc. (5073); and Progrexion Teleservices, Inc. (5110). The location of the Debtors’ service address for purposes of these chapter 11 cases is: 257 East 200 South, Suite 1200, Salt Lake City, Utah 84111.

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Objection.

annexed hereto, and any responses thereto; and upon the record herein; and after due deliberation and sufficient cause appearing therefore, it is FOUND AND DETERMINED that:

A. This Objection is a core proceeding under 28 U.S.C. § 157(b)(2).

B. Each holder of a Claim listed on Schedule 1 and ~~Schedule 2~~ attached hereto was properly and timely served with a copy of the Objection, this order (this “Order”), the accompanying exhibits, and the notice.

C. Any entity known to have an interest in the Disputed Claims subject to the Objection has been afforded reasonable opportunity to respond to, or be heard regarding, the relief requested in the Objection.

D. Each of the Cured Claims on Schedule 1 hereto asserts a liability that was cured in connection with the Sale Transactions.

~~E. Each of the WARN Class Claims on Schedule 2 hereto asserts a liability by a member of the WARN Class that will be satisfied in connection with the WARN Settlement.~~

IT IS HEREBY ORDERED ADJUDGED AND DECREED that:

1. [This order is supplemental to the Order Sustaining Plan Administrator’s Second Omnibus Objection \(Substantive\) to Certain Cured Claims and WARN Class Claims entered at docket number 794, which is unaffected by the entry of this order.](#)

2. ~~1.~~ The Objection is sustained as set forth herein.

3. ~~2.~~ Any response to the Objection not otherwise withdrawn, resolved, or adjourned is hereby overruled on its merits.

4. ~~3.~~ Each of the Cured Claims listed as an objectionable Claim on Schedule 1 hereto is disallowed.

~~4. Each of the WARN Class Claims listed as an objectionable Claim on Schedule 2 hereto was asserted by a member of the WARN Class for liabilities asserted in the WARN Action, who will be entitled to distributions on account of such claim solely from the WARN Settlement.~~

~~5.~~

5. ~~6.~~ The official claims register in these cases shall be modified in accordance with this Order.

6. ~~7.~~ Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in this Order shall be deemed: (a) an admission as to the validity of any prepetition Claim against a Debtor entity; (b) a waiver of the Debtors' right to dispute any prepetition Claim on any grounds; (c) a promise or requirement to pay any prepetition Claim; (d) a request or authorization to assume any prepetition agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code; or (e) a waiver of the Debtors' rights under the Bankruptcy Code or any other applicable law.

7. ~~8.~~ The Debtors' and Plan Administrator's rights to amend, modify, or supplement the Objection, and the rights of all parties in interest to file additional objections to the Disputed Claims or any other Claims (filed or not) which may be asserted against the Debtors, and to seek further reduction of any Disputed Claim to the extent such Claim has been paid, are preserved. Additionally, should one or more of the grounds of objection stated in the Objection be dismissed, the Debtors' rights, the Plan Administrator's rights, and the rights of other parties in interest to object on the other stated grounds or on any other grounds that the Debtors or other parties in interest may discover during this case are further preserved.

8. ~~9.~~ Each Disputed Claim, and the objections by the Debtors to such Disputed Claim, as addressed in the Objection and set forth on Schedule 1 and ~~Schedule 2~~ hereto, constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014 and Local Rule 3007-1. This Order shall be deemed a separate Order with respect to each Disputed Claim. Any stay of this Order pending appeal by any claimants whose Claims are subject to this Order shall only apply to the contested matter that involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

9. ~~10.~~ Notwithstanding the possible applicability of Bankruptcy Rules 6004, 7062, 9014 or otherwise, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

10. ~~11.~~ This Court shall retain jurisdiction over the Debtors and the claimants whose Claims are subject to the Objection with respect to any matters related to or arising from the Objection and the implementation of this Order.

Schedule 1

Cured Claims

Schedule 2

~~WARN Class Claims~~