

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
SOUTHEASTERN DIVISION

In re:	§ Chapter 11
	§
	§ Case No. 20-43597-399
BRIGGS & STRATTON CORPORATION, <i>et al.</i> ,	§
	§ (Jointly Administered)
	§
Debtors.	§ Hearing Date: December 2, 2021
	§ Hearing Time: 2:00 p.m. (Central Time)
	§ Hearing Location: Courtroom 5 North
	§ 111 S. 10th St., St. Louis, MO 63102

**NOTICE OF THE PLAN ADMINISTRATOR’S TWENTY-NINTH  
OMNIBUS OBJECTION TO CLAIMS (REDUCED AND RECLASSIFIED CLAIMS)**

**THIS IS AN OBJECTION TO YOUR CLAIM. THE OBJECTING PARTY IS ASKING THE COURT TO DISALLOW THE CLAIM THAT YOU FILED IN THIS BANKRUPTCY CASE.**

**IF YOU CHOOSE TO RESPOND, A WRITTEN RESPONSE MUST BE FILED WITH THE CLERK OF COURT, U.S. BANKRUPTCY COURT, 111 SOUTH TENTH STREET, 4TH FLOOR, ST. LOUIS, MISSOURI 63102, AND A COPY SERVED UPON COUNSEL TO THE PLAN ADMINISTRATOR, (A) HALPERIN BATTAGLIA BENZIJA LLP, 40 WALL STREET, 37<sup>TH</sup> FLOOR, NEW YORK, NEW YORK 10005 (ATTN: JULIE DYAS GOLDBERG, ESQ. AND MATTHEW T. MURRAY, ESQ.) AND (B) CARMODY MACDONALD P.C., 120 S. CENTRAL AVENUE, SUITE 1800, ST. LOUIS, MISSOURI 63105 (ATTN: DORMIE KO, ESQ.), SO THAT THE RESPONSE IS RECEIVED NO LATER THAN 11:59 P.M. (PREVAILING CENTRAL TIME) ON NOVEMBER 25, 2021.**

**FAILURE TO FILE A TIMELY RESPONSE MAY RESULT IN THE COURT GRANTING THE RELIEF REQUESTED PRIOR TO THE HEARING DATE. YOU SHOULD READ THIS NOTICE AND THE ACCOMPANYING MOTION CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE.**

**Important Information Regarding the Objection**

1. **Grounds for the Objection.** By this Objection,<sup>1</sup> the Plan Administrator, on behalf of the Wind-Down Estates of the Debtors, is seeking to reduce and reclassify (and in one instance, modify by increase) the claims identified on **Exhibit A** attached to the proposed order (individually, a “**Claim**”, and collectively, the “**Claims**”).

<sup>1</sup> Capitalized terms used but not defined herein have the meanings ascribed to them in the Debtors’ Second Amended Joint Plan (the “**Plan**”).



### **Resolving the Objection**

2. **Parties Required to File a Response.** If you disagree with the Objection filed with respect to any of your claims, you may file a response (each, a “**Response**”) with the Court in accordance with the procedures described below and appear at the Hearing (as defined herein).

3. **Response Contents.** Each Response should contain the following (at a minimum):

- a. a caption stating the name of the Court, the name of the Debtors, the case number, and the Objection and claim or claims within the Objection to which the Response is directed;
- b. a concise statement setting forth the reasons why the Court should not grant the objection with respect to such claim(s), including the factual and legal bases upon which you rely in opposing the Objection;
- c. copies of documentation or other evidence of your claim (not previously filed with proof of such claim) on which your Response is based (excluding confidential, proprietary, or other protected information, copies of which must be provided to the counsel to the Plan Administrator, subject to appropriate confidentiality constraints, if any); and
- d. the following contact information:
  - (i) your name, address, telephone number, and email address or the name, address, telephone number, and email address of your attorney or designated representative to whom the attorneys for the Plan Administrator should serve a reply to the Response, if any; or
  - (ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the objection on your behalf (to the extent different from the information detailed in paragraph 3(d)(i) above).

4. **Response Deadline.** Your Response must be filed with the Court and served so as to be *actually received* by **11:59 p.m. (Central Time) on November 25, 2021** (the “**Response Deadline**”).

5. **Failure to Respond.** A Response that is not filed and served in accordance with the procedures set forth herein may not be considered by the Court at the Hearing. **Absent an agreement with the Plan Administrator resolving the Objection to a claim, failure to timely file and serve a Response as set forth herein and appear at the**

**Hearing may result in the Court granting the Objection without further notice or hearing.**  
Upon entry of an order, you will be served with a notice of entry, and a copy, of the order.

### **Hearing on the Objection**

6. **Date, Time, and Location.** If necessary, a hearing (the “**Hearing**”) on the Objection will be held on **December 2, 2021 at 2:00 p.m. (Central Time) in the United States Bankruptcy Court for the Eastern District of Missouri, 5th Floor, North Courtroom, Thomas F. Eagleton United States Courthouse, 111 South Tenth Street, St. Louis, Missouri.** Such Hearing may be adjourned from time to time in these chapter 11 cases in the Plan Administrator’s sole discretion. **You must attend the Hearing if you disagree with the Objection and have filed a Response.** If you file a Response in accordance with the response procedures herein, but such Response is not resolved prior to the Hearing, and you appear at the Hearing, the Objection may be heard at the Hearing or adjourned to a subsequent hearing in the Plan Administrator’s sole discretion. If a subsequent hearing is determined to be necessary, the Plan Administrator will file with the Court and serve you with a notice of the subsequent hearing (the date of which will be determined in consultation with the affected claimant(s)).

### **Additional Information**

7. **Questions or Information.** Copies of the pleadings (collectively, the “**Pleadings**”) filed in these chapter 11 cases are available at no cost at the Debtors’ case website <http://www.kccllc.net/Briggs>. You may also obtain copies of any of the Pleadings filed in these chapter 11 cases for a fee at the Court’s website at <https://pcl.uscourts.gov/pcl/>. A login identification and password to the Court’s Public Access to Court Electronic Records (“**PACER**”) are required to access this information and can be obtained through the PACER Service Center at <http://www.pacer.psc.uscourts.gov>.

### **Reservation of Rights**

**NOTHING IN ANY OMNIBUS OBJECTION OR OBJECTION NOTICE IS INTENDED OR SHALL BE DEEMED TO CONSTITUTE (I) AN ADMISSION AS TO THE VALIDITY OF ANY PREPETITION CLAIM AGAINST A DEBTOR; (II) A WAIVER OF ANY PARTY’S RIGHT TO DISPUTE ANY PREPETITION CLAIM ON ANY GROUNDS; (III) A PROMISE OR REQUIREMENT TO PAY ANY PREPETITION CLAIM; (IV) AN IMPLICATION OR ADMISSION THAT ANY PARTICULAR CLAIM IS OF A TYPE SPECIFIED OR DEFINED IN THE MOTION OR ANY ORDER GRANTING THE RELIEF REQUESTED BY THE MOTION; (V) A REQUEST OR AUTHORIZATION TO ASSUME ANY PREPETITION AGREEMENT, CONTRACT, OR LEASE PURSUANT TO SECTION 365 OF THE BANKRUPTCY CODE; OR (VI) A WAIVER OF THE PLAN ADMINISTRATOR’S RIGHTS UNDER THE BANKRUPTCY CODE OR ANY OTHER APPLICABLE LAW.**

Dated: November 2, 2021  
St. Louis, Missouri

CARMODY MACDONALD P.C.

/s/ Robert E. Eggmann

Robert E. Eggmann, #37374MO  
Christopher J. Lawhorn, #45713MO  
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*Local Counsel to the Plan Administrator*

-and-

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*Counsel to the Plan Administrator*

**EXHIBIT A**

**Schedule of Reduced and Reclassified Claims**

**Exhibit A**  
*Briggs & Stratton Corp., et al.*

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Modified Claim Amount and		Basis for Proposed Modification
					Claim Amount and Priority	Priority	Priority	Priority	
1) Amanda Funk W335N7185 Stone Bank Road Oconomowoc, WI 53066	20-43597	Briggs & Stratton Corporation	1099	10/4/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$2,632.65 Unsecured: \$10,030.59 Total: \$12,663.24	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$10,030.57 Total: \$10,030.57	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$10,030.57 Total: \$10,030.57	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
2) Andrew Diestler 508 Maple St Ft Atkinson, WI 53538	20-43597	Briggs & Stratton Corporation	1850	9/29/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$24,936.81 Total: \$38,586.81	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$24,936.81 Total: \$24,936.81	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$24,936.81 Total: \$24,936.81	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
3) Barbara Benish S87 W27745 Lakeview Ln Mukwonago, WI 53149	20-43597	Briggs & Stratton Corporation	1704	9/30/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$29,040.90 Total: \$42,690.90	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$25,815.00 Total: \$25,815.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$25,815.00 Total: \$25,815.00	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
4) Brandon C. Palicki W3175651 Robin Lane Delafield, WI 53018	20-43597	Briggs & Stratton Corporation	2440	11/11/2020	Secured: \$0.00 Administrative: \$38,370.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$38,370.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$38,370.00 Total: \$38,370.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$38,370.00 Total: \$38,370.00	Agreed severance amount after payment of \$13,650 in accordance with the Wage Order is a general unsecured claim and does not qualify for administrative claim status.	
5) Christine Winius 1460 Valley Ridge Dr Brookfield, WI 53005	20-43597	Briggs & Stratton Corporation	1599	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$18,946.28 Total: \$32,596.28	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$18,946.28 Total: \$18,946.28	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$18,946.28 Total: \$18,946.28	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
6) Craig Allan Claerbout 5550 West Lake Dr West Bend, WI 53095	20-43597	Briggs & Stratton Corporation	137	8/14/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$44,180.21 Unsecured: \$0.00 Total: \$44,180.21	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$30,530.21 Total: \$30,530.21	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$30,530.21 Total: \$30,530.21	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
7) Dale A Barrett 3503 Speaker Trl Murray, KY 42071	20-43597	Briggs & Stratton Corporation	498	9/11/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$33,104.72 Total: \$46,754.72	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$33,104.72 Total: \$33,104.72	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$33,104.72 Total: \$33,104.72	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
8) David A Kratz 4445 N 150th St Brookfield, WI 53005	20-43597	Briggs & Stratton Corporation	596	9/16/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$34,800.48 Total: \$48,450.48	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$34,800.48 Total: \$34,800.48	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$34,800.48 Total: \$34,800.48	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
9) Dennis A Perkins 21465 Hallendale Ct Brookfield, WI 53045	20-43597	Briggs & Stratton Corporation	1118	9/18/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$1,608.92 Unsecured: \$0.00 Total: \$1,608.92	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$1,608.92 Total: \$1,608.92	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$1,608.92 Total: \$1,608.92	Employee was paid \$13,650 under the wage motion. Remaining severance does not qualify as a priority claim	
10) Douglas Callies 3830 Pleasant Valley Rd West Bend, WI 53095	20-43597	Briggs & Stratton Corporation	377	9/8/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$8,790.00 Total: \$22,440.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$8,790.00 Total: \$8,790.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$8,790.00 Total: \$8,790.00	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
11) Douglas Jingst 661 Cedars Ct Longboat Key, FL 34228	20-43597	Briggs & Stratton Corporation	847	9/30/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$110,905.00 Total: \$110,905.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$110,905.00 Total: \$110,905.00	Claimant filed an unliquidated claim for Supplemental Employee Pension Plan payments of \$634.39 per month plus \$8,000 in life insurance. The Debtors' actuary, Mercer, values the SERP at \$102,905, which amount shall be allowed by the Plan Administrator in accordance with the Plan.	

Exhibit A  
Briggs & Stratton Corp., et al.

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Modified Claim Amount and		Basis for Proposed Modification
					Claim Amount and Priority	Priority	Priority	Priority	
12) Douglas S Seay 6573 State Rt 564 Mayfield, KY 42066	20-43597	Briggs & Stratton Corporation	481	9/10/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$4,934.36 Total: \$18,584.36	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$4,934.36 Total: \$4,934.36	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$4,934.36 Total: \$4,934.36	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
13) Edward Haberstroh 2501 Fox River Circle Waukesha, WI 53189	20-43597	Briggs & Stratton Corporation	656	9/14/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$2,318.10 Total: \$15,968.10	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$3,769.72 Total: \$3,769.72	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$3,769.72 Total: \$3,769.72	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
14) George J. Guzewski 2281 Scenic Road Richfield, WI 53076	20-43597	Briggs & Stratton Corporation	1382	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$43,076.77 Unsecured: \$0.00 Total: \$43,076.77	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$33,074.84 Total: \$33,074.84	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$33,074.84 Total: \$33,074.84	Employee was paid \$13,650 under the wage motion. Remaining severance does not qualify as a priority claim	
15) George P Klonis George Klonis 14130 W North Oak Ct New Berlin, WI 53151	20-43597	Briggs & Stratton Corporation	272	8/19/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$54,895.55 Unsecured: \$0.00 Total: \$54,895.55	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$41,245.55 Total: \$41,245.55	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$41,245.55 Total: \$41,245.55	Employee was paid \$13,650 under the wage motion. Remaining severance does not qualify as a priority claim	
16) Jack Walrath S66W28412 River Rd Waukesha, WI 53189	20-43597	Briggs & Stratton Corporation	234	8/17/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$9,489.68 Total: \$23,139.68	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$9,489.68 Total: \$9,489.68	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$9,489.68 Total: \$9,489.68	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
17) James Loudon 5791 County Road Z West Bend, WI 53095	20-43597	Briggs & Stratton Corporation	1928	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$30,936.90 Unsecured: \$0.00 Total: \$30,936.90	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$27,806.93 Total: \$27,806.93	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$27,806.93 Total: \$27,806.93	Employee was paid \$13,650 under the wage motion. Remaining severance does not qualify as a priority claim	
18) James R. Nommensen 901 E Stonegate Dr Oak Creek, WI 53154	20-43597	Briggs & Stratton Corporation	476	9/10/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$51,142.63 Total: \$64,792.63	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$51,142.63 Total: \$51,142.63	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$51,142.63 Total: \$51,142.63	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
19) Jody J. Kardos 6243 Charles St. Racine, WI 53402	20-43597	Briggs & Stratton Corporation	265	8/18/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$11,041.00 Total: \$24,691.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$11,041.00 Total: \$11,041.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$11,041.00 Total: \$11,041.00	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
20) John Paulbeck N108 W16991 Hawthorne Dr Germantown, WI 53022	20-43597	Briggs & Stratton Corporation	581	9/16/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$24,061.25 Unsecured: \$0.00 Total: \$24,061.25	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$10,411.25 Total: \$10,411.25	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$10,411.25 Total: \$10,411.25	Employee was paid \$13,650 under the wage motion. Remaining severance does not qualify as a priority claim	
21) Kevin C Fischer 4602 LaSalle Street Racine, WI 53402	20-43597	Briggs & Stratton Corporation	440	8/31/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$19,118.05 Total: \$32,768.05	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$16,139.09 Total: \$16,139.09	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$16,139.09 Total: \$16,139.09	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
22) Marvin Vissers 8940 S Patricia Blvd Oak Creek, WI 53154	20-43597	Briggs & Stratton Corporation	533	9/14/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$25,987.78 Total: \$39,637.78	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$25,987.78 Total: \$25,987.78	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$25,987.78 Total: \$25,987.78	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	

**Exhibit A**  
*Briggs & Stratton Corp., et al.*

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Modified Claim Amount and		Basis for Proposed Modification
					Claim Amount and Priority	Priority	Priority	Priority	
23) Michael J Honisch 3080 S Stratton Drive West Allis, WI 53219-5321	20-43597	Briggs & Stratton Corporation	124	8/12/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$28,075.31 Total: \$41,725.31	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$20,446.73 Total: \$20,446.73	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$20,446.73 Total: \$20,446.73	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
24) Michael J Zimmerman 9250 Valley Rd Oconomowoc, WI 53066	20-43597	Briggs & Stratton Corporation	810	9/28/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$52,901.91 Unsecured: \$0.00 Total: \$52,901.91	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$39,251.91 Total: \$39,251.91	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$39,251.91 Total: \$39,251.91	Employee was paid \$13,650 under the wage motion. Remaining severance does not qualify as a priority claim	
25) Michael J. Padovano N59W24569 Quail Run Lane Sussex, WI 53089	20-43597	Briggs & Stratton Corporation	235	8/17/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$9,438.00 Total: \$23,088.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$9,438.04 Total: \$9,438.04	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$9,438.04 Total: \$9,438.04	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
26) Nancy J Gentz 1182 Hunter Ridge Ellijay, GA 30540	20-43597	Briggs & Stratton Corporation	1931	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$1,755.90 Unsecured: \$0.00 Total: \$1,755.90	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$1,755.90 Total: \$1,755.90	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$1,755.90 Total: \$1,755.90	Agreed severance amount after payment of \$13,650 in accordance with the Wage Order is a general unsecured claim and does not qualify for administrative claim status.	
27) Neal J Anderson W220N8306 Townline Rd Menomonee Falls, WI 53051	20-43597	Briggs & Stratton Corporation	421	9/9/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$34,168.33 Total: \$47,818.33	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$34,168.33 Total: \$34,168.33	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$34,168.33 Total: \$34,168.33	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
28) Nicole A. Wilson W329S3089 Bryn Mawr Road Dousman, WI 53118	20-43597	Briggs & Stratton Corporation	795	9/27/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$9,354.46 Unsecured: \$0.00 Total: \$9,354.46	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$9,354.46 Total: \$9,354.46	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$9,354.46 Total: \$9,354.46	The claim is for employee tuition reimbursement, which does not qualify for treatment as a Priority claim.	
29) Pamela J Mcevoy 17121 West National Aven New Berlin, WI 53151	20-43597	Briggs & Stratton Corporation	858	9/15/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$23,159.49 Total: \$36,809.49	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$5,870.00 Total: \$5,870.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$5,870.00 Total: \$5,870.00	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
30) Patrick H Latunski 1632 Keli Jean Ct. Hubertus, WI 53033-5303	20-43597	Briggs & Stratton Corporation	404	9/9/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$15,247.82 Total: \$28,897.82	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$5,615.21 Total: \$5,615.21	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$5,615.21 Total: \$5,615.21	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
31) Randall Jay Klotka 820 Prairie Run Grafton, WI 53024	20-43597	Briggs & Stratton Corporation	341	9/2/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$34,567.55 Total: \$48,217.55	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$34,567.55 Total: \$34,567.55	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$34,567.55 Total: \$34,567.55	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
32) Robert Johnson 13665 W Cleveland Ave New Berlin, WI 53151	20-43597	Briggs & Stratton Corporation	219	8/12/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$23,667.10 Unsecured: \$0.51 Total: \$23,667.61	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$11,451.45 Total: \$11,451.45	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$11,451.45 Total: \$11,451.45	Employee was paid \$13,650 under the wage motion. Remaining severance does not qualify as a priority claim	
33) Robert M. Johnson 1725 Steeple Dr. East Troy, WI 53120-2055	20-43597	Briggs & Stratton Corporation	793	9/26/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$31,016.50 Total: \$31,016.50	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$21,462.50 Total: \$21,462.50	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$21,462.50 Total: \$21,462.50	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	



**Exhibit A**  
*Briggs & Stratton Corp., et al.*

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Modified Claim Amount and		Basis for Proposed Modification
					Claim Amount and Priority	Priority	Priority	Priority	
34) Ryan M. Guilette N6495 Lakeshore Drive Tony, WI 54563	20-43597	Briggs & Stratton Corporation	923	9/15/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$59,317.00 Total: \$72,967.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$51,644.19 Total: \$51,644.19	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$51,644.19 Total: \$51,644.19	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
35) Scott A Funke 4093 S Wilshire Ct New Berlin, WI 53151-5261	20-43597	Briggs & Stratton Corporation	1455	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$23,133.18 Total: \$36,783.18	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$23,133.00 Total: \$23,133.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$23,133.00 Total: \$23,133.00	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
36) Steven Kruger W292N4275 Prairie Wind Cir N Pewaukee, WI 53072	20-43597	Briggs & Stratton Corporation	695	9/21/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$73,568.11 Total: \$87,218.11	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$27,253.14 Total: \$27,253.14	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$27,253.14 Total: \$27,253.14	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
37) Steven P Tkachuk W151N10713 Preserve Py Germantown, WI 53022	20-43597	Briggs & Stratton Corporation	558	9/14/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$3,349.88 Unsecured: \$45,821.79 Total: \$49,171.67	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$35,521.67 Total: \$35,521.67	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$35,521.67 Total: \$35,521.67	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
38) Thomas Gerard Glatch 1855 San Fernando Dr. Elm Grove, WI 53122	20-43597	Briggs & Stratton Corporation	2006	10/1/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$10,155.95 Total: \$10,155.95	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$7,991.74 Total: \$7,991.74	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$7,991.74 Total: \$7,991.74	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
39) Thomas M. Burkard N61 W29060 Parkside PL Hartland, WI 53029	20-43597	Briggs & Stratton Corporation	1539	10/6/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$89,927.71 Total: \$89,927.71	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$1,427.71 Total: \$1,427.71	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$1,427.71 Total: \$1,427.71	The asserted claim includes amounts for Long Term Incentive Compensation, which are disallowed as the requirements for a change in control did not occur.	
40) Timothy G. Wild 136 Legend Way Wales, WI 53183	20-43597	Briggs & Stratton Corporation	1388	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$76,753.82 Total: \$90,403.82	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$40,877.76 Total: \$40,877.76	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$40,877.76 Total: \$40,877.76	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
SOUTHEASTERN DIVISION

In re:	§	Chapter 11
	§	
BRIGGS & STRATTON	§	Case No. 20-43597-399
CORPORATION, <i>et al.</i> ,	§	
	§	(Jointly Administered)
	§	
Debtors.	§	Hearing Date: December 2, 2021
	§	Hearing Time: 2:00 p.m. (Central Time)
	§	Hearing Location: Courtroom 5 North
	§	111 S. 10th St., St. Louis, MO 63102

**THE PLAN ADMINISTRATOR’S TWENTY-NINTH OMNIBUS  
OBJECTION TO CLAIMS (REDUCED AND RECLASSIFIED CLAIMS)**

**THIS IS AN OBJECTION TO YOUR CLAIM. THE OBJECTING PARTY IS ASKING THE COURT TO DISALLOW THE CLAIM THAT YOU FILED IN THIS BANKRUPTCY CASE.**

**IF YOU CHOOSE TO RESPOND, A WRITTEN RESPONSE MUST BE FILED WITH THE CLERK OF COURT, U.S. BANKRUPTCY COURT, 111 SOUTH TENTH STREET, 4TH FLOOR, ST. LOUIS, MISSOURI 63102, AND A COPY SERVED UPON COUNSEL TO THE PLAN ADMINISTRATOR, (A) HALPERIN BATTAGLIA BENZIJA LLP, 40 WALL STREET, 37<sup>TH</sup> FLOOR, NEW YORK, NEW YORK 10005 (ATTN: JULIE DYAS GOLDBERG, ESQ. AND MATTHEW T. MURRAY, ESQ.) AND (B) CARMODY MACDONALD P.C., 120 S. CENTRAL AVENUE, SUITE 1800, ST. LOUIS, MISSOURI 63105 (ATTN: DORMIE KO, ESQ.), SO THAT THE RESPONSE IS RECEIVED NO LATER THAN 11:59 P.M. (PREVAILING CENTRAL TIME) ON NOVEMBER 25, 2021.**

**FAILURE TO FILE A TIMELY RESPONSE MAY RESULT IN THE COURT GRANTING THE RELIEF REQUESTED PRIOR TO THE HEARING DATE. YOU SHOULD READ THIS NOTICE AND THE ACCOMPANYING MOTION CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE.**

Alan D. Halperin as Plan Administrator (the “**Plan Administrator**”) under the *Amended Joint Chapter 11 Plan of Briggs & Stratton Corporation and its Affiliated Debtors*, dated November 9, 2020 [Docket No. 1226] (the “**Plan**”),<sup>1</sup> respectfully represents as follows in

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

support of this omnibus objection to claims (the “**Objection**”) on grounds that such claims should be reduced and reclassified (collectively, the “**Reduced and Reclassified Claims**”).

Accordingly, attached hereto as **Exhibit A** are those claims where the Plan Administrator seeks to reduce and reclassify (and in one instance, modify by increase) the claim on the basis that they are all claims filed by employees (each, a “**Claimant**”) that have been partially satisfied, including payment of the \$13,650.00 amount subject to priority under 11 U.S.C. 507(a)(4).<sup>2</sup>

In further support of the Objection, attached hereto as **Exhibit B** is the *Declaration of Alan D. Halperin in Support of the Plan Administrator’s Twenty-Ninth Omnibus Objection to Claims (Reduced and Reclassified Claims)* (the “**Halperin Claims Declaration**”):

#### **Background**

1. On July 20, 2020 (the “**Petition Date**”), the Debtors each commenced with this Court a voluntary case under title 11 of the United States Code (the “**Bankruptcy Code**”). The Debtors are authorized to continue to operate their business and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. On August 5, 2020, the United States Trustee appointed an official committee of unsecured creditors (the “**Creditors’ Committee**”) in these chapter 11 cases pursuant to section 1102 of the Bankruptcy Code. No trustee or examiner has been appointed in these chapter 11 cases. The Debtors’ chapter 11 cases are being jointly administered for

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<sup>2</sup> In most instances, the Claimants have asserted a priority claim for some or all of the claimed amount which the Plan Administrator posits has been satisfied. In a small number of cases, the Claimants did not formally document the priority assertion, but all Claimants included in this Objection were Debtors’ employees. Accordingly, the Plan Administrator has characterized this as a “reduce and reclassify” Objection to ensure that no priority assertions remain in the event the relief requested is granted. In one instance, Claim No. 847 of Douglas Jingst, the Plan Administrator seeks to increase his claim to match the independent third-party audit of the Debtors’ Supplemental Employee Retirement Plan, as described more fully in **Exhibit A**.

procedural purposes only pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) and Rule 1015(b) of the Local Rules of Bankruptcy Procedure of the United States Bankruptcy Court for the Eastern District of Missouri (the “**Local Rules**”).

3. On September 15, 2020, the Court entered an order authorizing the Debtors to sell substantially all of their assets<sup>3</sup> to Bucephalus Buyer, LLC (the “**Purchaser**”) and on September 21, 2020, the Debtors closed the Sale Transaction.<sup>4</sup> On December 16, 2020, the Debtors filed the Plan, which was confirmed by the *Findings of Fact, Conclusions of Law, and Order Confirming the Plan* on December 18, 2020 [Docket No. 1485] (the “**Confirmation Order**”).

4. The Effective Date of the Plan occurred on January 6, 2021 and the *Notice of Entry of Order Confirming the Plan and Occurrence of the Effective Date* [Docket No. 1538] was filed, at which time the Creditors’ Committee was relieved of its duties and the Plan Administrator took over the administration of the Wind-Down Estates in accordance with the Plan. The Wind-Down Estates continue to honor their post-closing sale obligations, wind down the estates, and otherwise work on concluding these chapter 11 cases.

5. On February 12, 2020, the Bankruptcy Court entered that certain *Order Approving (I) Claims Objection Procedures; (II) Claims Hearing Procedures; and (III) Granting Related Relief* [Docket No. 1614] (the “**Omnibus Procedures Order**”), which, among other things, increased the number of claims authorized to be filed in an omnibus claim objection such as this Objection to three hundred fifty (350) Claims.

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<sup>3</sup> *Order (I) Authorizing the Sale of the Assets and Equity Interests to the Purchaser Free and Clear of Liens, Claims, Interests, and Encumbrances; (II) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (III) Granting Related Relief* [Docket No. 898].

<sup>4</sup> *See Notice of (I) Filing of Amendment to Stock and Asset Purchase Agreement, And (II) the Occurrence of Closing of the Sale Transaction* [Docket No. 964].

### **Jurisdiction**

6. The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

### **Relief Requested**

7. Pursuant to section 502(b) of the Bankruptcy Code, Bankruptcy Rule 3007, and Local Rule 3007(C), the Plan Administrator respectfully requests entry of an order (the “**Proposed Order**”)<sup>5</sup> reducing and reclassifying the Reduced and Reclassified Claims listed on **Exhibit A**.

### **Claims Reconciliation**

8. On August 23, 2020, the Debtors filed their schedules of assets, liabilities, current income, expenditures, executory contracts, and unexpired leases and statements of financial affairs, as required by section 521 of the Bankruptcy Code [Docket Nos. 555–559] (collectively, the “**Schedules**”).

9. On August 24, 2020, the Court entered an order [Docket No. 564] (the “**Bar Date Order**”), which, among other things, established (a) October 7, 2020 as the deadline for all non-governmental entities holding or wishing to assert a “claim” (as defined in section 101(5) of the Bankruptcy Code) against any of the Debtors that arose before the Petition Date to file a proof of such claim in writing, and (b) January 19, 2021 as the deadline for all governmental entities holding or wishing to assert a “claim” against any of the Debtors that arose before the Petition Date to file a proof of such claim in writing.

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<sup>5</sup> Copies of the Proposed Order will be made available on the Debtors’ case information website at <http://www.kccllc.net/Briggs>.

10. As of the date hereof, approximately 3,000 proofs of claim (the “**Proofs of Claim**”) have been filed against the Debtors. The Plan Administrator and his advisors have been working diligently to review these Proofs of Claim, including any supporting documentation filed therewith. For the reasons set forth below, and based on their review to date, the Plan Administrator has determined that the claims objected to herein should be disallowed.

11. The Plan Administrator’s professionals and consultants have maintained books and records that reflect, among other things, the Debtors’ liabilities and the amounts thereof owed to their creditors (the “**Books and Records**”). The Plan Administrator and his professionals are reviewing and reconciling Proofs of Claim filed by creditors with the Books and Records, as well as the Debtor’s Schedules. In connection therewith, the Plan Administrator and his professionals have reviewed the Claims filed by the Claimants listed on **Exhibit A** hereto and have concluded each Reduced and Reclassified Claim is appropriately objected to on the basis that each such claim has already been partially satisfied, including the portions asserted to be entitled to priority under 11 U.S.C. § 507(a)(4).

**Relief Requested Should Be Granted**

12. Pursuant to section 502 of the Bankruptcy Code, “[a] claim or interest, proof of which is filed under section 501 of [the Bankruptcy Code], is deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a). Bankruptcy Rule 3001(f) provides that a properly executed and filed proof of claim constitutes *prima facie* evidence of the validity and amount of the claim under section 502(a) of the Bankruptcy Code. FED. R. BANKR. P. 3001(f). The act of filing an objection alone “does not deprive the proof of claim of presumptive validity unless the objection is supported by substantial evidence.” *In re Austin*, 538 B.R. 543, 545 (Bankr. E.D. Mo. 2015) (citing *In re McDaniel*, 264 B.R. 531, 533 (B.A.P. 8th Cir. 2001)). If the objection presents evidence “rebutting the claim,” then “the claimant must produce additional

evidence to prove the validity of the claim by a preponderance of the evidence.” *In re Austin*, 538 B.R. at 545 (citing *In re Gran*, 964 F.2d 822, 827 (8th Cir. 1992)); *see also In re Peabody Energy Corp.*, Case No. 16-42529 (BSS), 2017 WL 4570700, at \*7 (Bankr. E.D. Mo. Oct. 12, 2017); *In re Seagraves*, Case No. 12-49433 (BSS), 2015 WL 2026707, at \*2 (Bankr. E.D. Mo. Apr. 30, 2015); *Dove-Nation v. eCast Settlement Corp. (In re Dove-Nation)*, 318 B.R. 147, 152 (B.A.P. 8th Cir. 2004) (citing *In re Innovative Software Designs, Inc.*, 253 B.R. 40, 44 (B.A.P. 8th Cir. 2000)).

13. The Plan Administrator objects to the Reduced the Reclassified Claims because the Claimants who filed such claims have both overstated the Debtors’ current liability as well as have, in most instances, asserted an improper classification. The Plan Administrator’s professionals have reviewed each Reduced and Reclassified Claim, the supporting documentation filed therewith, and the Books and Records, and have found no basis for the liability as asserted. Therefore, the Reduced and Reclassified Claims identified in **Exhibit A** should be reduced and reclassified as set forth therein.

#### **Reservation of Rights**

14. Nothing contained herein is intended to be or shall be deemed as (i) an admission as to the validity of any claim against the Debtors or the Wind-Down Estates, (ii) a waiver or limitation of rights to dispute the amount of, basis for, or validity of any claim, (iii) a waiver of rights under the Bankruptcy Code or any other applicable nonbankruptcy law, (iv) an agreement or obligation to pay any claims, (v) a waiver of any claims or causes of action which may exist against any creditor or interest holder, or (vi) an approval, assumption, adoption, or rejection of any agreement, contract, lease, program, or policy under section 365 of the Bankruptcy Code.

**Notice**

15. Notice of this Objection will be provided to (i) the Office of the United States Trustee for the Eastern District of Missouri (Attn: Sirena Wilson, Esq.); (ii) the Claimant; (iii) any other party that has requested notice pursuant to Bankruptcy Rule 2002; and (iv) any other party entitled to notice pursuant to the Omnibus Procedures Order (collectively, the “**Notice Parties**”).

**No Previous Request**

16. No previous request for the relief sought herein has been made by the Debtors or the Plan Administrator to this or any other court.

*[Remainder of Page Intentionally Left Blank]*



WHEREFORE, the Plan Administrator respectfully requests entry of the Proposed Order granting the relief requested herein and such other and further relief as the Court may deem just and appropriate.

Dated: November 2, 2021  
St. Louis, Missouri

Respectfully submitted,

CARMODY MACDONALD P.C.

/s/ Robert E. Eggmann

Robert E. Eggmann, #37374MO  
Christopher J. Lawhorn, #45713MO  
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*Local Counsel to the Plan Administrator*

-and-

HALPERIN BATTAGLIA BENZIJA LLP  
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*Counsel to the Plan Administrator*

**EXHIBIT A**

**Schedule of Reduced and Reclassified Claims**

Exhibit A  
Briggs & Stratton Corp., et al.

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Modified Claim Amount and		Basis for Proposed Modification
					Claim Amount and Priority	Priority	Priority	Priority	
1) Amanda Funk W335N7185 Stone Bank Road Oconomowoc, WI 53066	20-43597	Briggs & Stratton Corporation	1099	10/4/2020	Secured:	\$0.00	Secured:	\$0.00	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.
					Administrative:	\$0.00	Administrative:	\$0.00	
					Priority:	\$2,632.65	Priority:	\$0.00	
					Unsecured:	\$10,030.59	Unsecured:	\$10,030.57	
					Total:	\$12,663.24	Total:	\$10,030.57	
2) Andrew Diestler 508 Maple St Ft Atkinson, WI 53538	20-43597	Briggs & Stratton Corporation	1850	9/29/2020	Secured:	\$0.00	Secured:	\$0.00	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.
					Administrative:	\$0.00	Administrative:	\$0.00	
					Priority:	\$13,650.00	Priority:	\$0.00	
					Unsecured:	\$24,936.81	Unsecured:	\$24,936.81	
					Total:	\$38,586.81	Total:	\$24,936.81	
3) Barbara Benish S87 W27745 Lakeview Ln Mukwonago, WI 53149	20-43597	Briggs & Stratton Corporation	1704	9/30/2020	Secured:	\$0.00	Secured:	\$0.00	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.
					Administrative:	\$0.00	Administrative:	\$0.00	
					Priority:	\$13,650.00	Priority:	\$0.00	
					Unsecured:	\$29,040.90	Unsecured:	\$25,815.00	
					Total:	\$42,690.90	Total:	\$25,815.00	
4) Brandon C. Palicki W3175651 Robin Lane Delafield, WI 53018	20-43597	Briggs & Stratton Corporation	2440	11/11/2020	Secured:	\$0.00	Secured:	\$0.00	Agreed severance amount after payment of \$13,650 in accordance with the Wage Order is a general unsecured claim and does not qualify for administrative claim status.
					Administrative:	\$38,370.00	Administrative:	\$0.00	
					Priority:	\$0.00	Priority:	\$0.00	
					Unsecured:	\$0.00	Unsecured:	\$38,370.00	
					Total:	\$38,370.00	Total:	\$38,370.00	
5) Christine Winius 1460 Valley Ridge Dr Brookfield, WI 53005	20-43597	Briggs & Stratton Corporation	1599	10/7/2020	Secured:	\$0.00	Secured:	\$0.00	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.
					Administrative:	\$0.00	Administrative:	\$0.00	
					Priority:	\$13,650.00	Priority:	\$0.00	
					Unsecured:	\$18,946.28	Unsecured:	\$18,946.28	
					Total:	\$32,596.28	Total:	\$18,946.28	
6) Craig Allan Claerbout 5550 West Lake Dr West Bend, WI 53095	20-43597	Briggs & Stratton Corporation	137	8/14/2020	Secured:	\$0.00	Secured:	\$0.00	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.
					Administrative:	\$0.00	Administrative:	\$0.00	
					Priority:	\$44,180.21	Priority:	\$0.00	
					Unsecured:	\$0.00	Unsecured:	\$30,530.21	
					Total:	\$44,180.21	Total:	\$30,530.21	
7) Dale A Barrett 3503 Speaker Trl Murray, KY 42071	20-43597	Briggs & Stratton Corporation	498	9/11/2020	Secured:	\$0.00	Secured:	\$0.00	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.
					Administrative:	\$0.00	Administrative:	\$0.00	
					Priority:	\$13,650.00	Priority:	\$0.00	
					Unsecured:	\$33,104.72	Unsecured:	\$33,104.72	
					Total:	\$46,754.72	Total:	\$33,104.72	
8) David A Kratz 4445 N 150th St Brookfield, WI 53005	20-43597	Briggs & Stratton Corporation	596	9/16/2020	Secured:	\$0.00	Secured:	\$0.00	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.
					Administrative:	\$0.00	Administrative:	\$0.00	
					Priority:	\$13,650.00	Priority:	\$0.00	
					Unsecured:	\$34,800.48	Unsecured:	\$34,800.48	
					Total:	\$48,450.48	Total:	\$34,800.48	
9) Dennis A Perkins 21465 Hallendale Ct Brookfield, WI 53045	20-43597	Briggs & Stratton Corporation	1118	9/18/2020	Secured:	\$0.00	Secured:	\$0.00	Employee was paid \$13,650 under the wage motion. Remaining severance does not qualify as a priority claim
					Administrative:	\$0.00	Administrative:	\$0.00	
					Priority:	\$1,608.92	Priority:	\$0.00	
					Unsecured:	\$0.00	Unsecured:	\$1,608.92	
					Total:	\$1,608.92	Total:	\$1,608.92	
10) Douglas Callies 3830 Pleasant Valley Rd West Bend, WI 53095	20-43597	Briggs & Stratton Corporation	377	9/8/2020	Secured:	\$0.00	Secured:	\$0.00	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.
					Administrative:	\$0.00	Administrative:	\$0.00	
					Priority:	\$13,650.00	Priority:	\$0.00	
					Unsecured:	\$8,790.00	Unsecured:	\$8,790.00	
					Total:	\$22,440.00	Total:	\$8,790.00	
11) Douglas Jingst 661 Cedars Ct Longboat Key, FL 34228	20-43597	Briggs & Stratton Corporation	847	9/30/2020	Secured:	\$0.00	Secured:	\$0.00	Claimant filed an unliquidated claim for Supplemental Employee Pension Plan payments of \$634.39 per month plus \$8,000 in life insurance. The Debtors' actuary, Mercer, values the SERP at \$102,905, which amount shall be allowed by the Plan Administrator in accordance with the Plan.
					Administrative:	\$0.00	Administrative:	\$0.00	
					Priority:	\$0.00	Priority:	\$0.00	
					Unsecured:	\$0.00	Unsecured:	\$110,905.00	
					Total:	\$0.00	Total:	\$110,905.00	

Exhibit A  
Briggs & Stratton Corp., et al.

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Modified Claim Amount and		Basis for Proposed Modification
					Claim Amount and Priority	Priority	Priority	Priority	
12) Douglas S Seay 6573 State Rt 564 Mayfield, KY 42066	20-43597	Briggs & Stratton Corporation	481	9/10/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$4,934.36 Total: \$18,584.36	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$4,934.36 Total: \$4,934.36	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$4,934.36 Total: \$4,934.36	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
13) Edward Haberstroh 2501 Fox River Circle Waukesha, WI 53189	20-43597	Briggs & Stratton Corporation	656	9/14/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$2,318.10 Total: \$15,968.10	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$3,769.72 Total: \$3,769.72	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$3,769.72 Total: \$3,769.72	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
14) George J. Guzewski 2281 Scenic Road Richfield, WI 53076	20-43597	Briggs & Stratton Corporation	1382	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$43,076.77 Unsecured: \$0.00 Total: \$43,076.77	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$33,074.84 Total: \$33,074.84	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$33,074.84 Total: \$33,074.84	Employee was paid \$13,650 under the wage motion. Remaining severance does not qualify as a priority claim	
15) George P Klonis George Klonis 14130 W North Oak Ct New Berlin, WI 53151	20-43597	Briggs & Stratton Corporation	272	8/19/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$54,895.55 Unsecured: \$0.00 Total: \$54,895.55	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$41,245.55 Total: \$41,245.55	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$41,245.55 Total: \$41,245.55	Employee was paid \$13,650 under the wage motion. Remaining severance does not qualify as a priority claim	
16) Jack Walrath S66W28412 River Rd Waukesha, WI 53189	20-43597	Briggs & Stratton Corporation	234	8/17/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$9,489.68 Total: \$23,139.68	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$9,489.68 Total: \$9,489.68	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$9,489.68 Total: \$9,489.68	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
17) James Loudon 5791 County Road Z West Bend, WI 53095	20-43597	Briggs & Stratton Corporation	1928	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$30,936.90 Unsecured: \$0.00 Total: \$30,936.90	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$27,806.93 Total: \$27,806.93	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$27,806.93 Total: \$27,806.93	Employee was paid \$13,650 under the wage motion. Remaining severance does not qualify as a priority claim	
18) James R. Nommensen 901 E Stonegate Dr Oak Creek, WI 53154	20-43597	Briggs & Stratton Corporation	476	9/10/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$51,142.63 Total: \$64,792.63	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$51,142.63 Total: \$51,142.63	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$51,142.63 Total: \$51,142.63	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
19) Jody J. Kardos 6243 Charles St. Racine, WI 53402	20-43597	Briggs & Stratton Corporation	265	8/18/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$11,041.00 Total: \$24,691.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$11,041.00 Total: \$11,041.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$11,041.00 Total: \$11,041.00	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
20) John Paulbeck N108 W16991 Hawthorne Dr Germantown, WI 53022	20-43597	Briggs & Stratton Corporation	581	9/16/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$24,061.25 Unsecured: \$0.00 Total: \$24,061.25	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$10,411.25 Total: \$10,411.25	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$10,411.25 Total: \$10,411.25	Employee was paid \$13,650 under the wage motion. Remaining severance does not qualify as a priority claim	
21) Kevin C Fischer 4602 LaSalle Street Racine, WI 53402	20-43597	Briggs & Stratton Corporation	440	8/31/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$19,118.05 Total: \$32,768.05	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$16,139.09 Total: \$16,139.09	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$16,139.09 Total: \$16,139.09	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
22) Marvin Vissers 8940 S Patricia Blvd Oak Creek, WI 53154	20-43597	Briggs & Stratton Corporation	533	9/14/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$25,987.78 Total: \$39,637.78	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$25,987.78 Total: \$25,987.78	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$25,987.78 Total: \$25,987.78	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	

Exhibit A  
Briggs & Stratton Corp., et al.

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Modified Claim Amount and		Basis for Proposed Modification
					Claim Amount and Priority	Priority	Priority	Priority	
23) Michael J Honisch 3080 S Stratton Drive West Allis, WI 53219-5321	20-43597	Briggs & Stratton Corporation	124	8/12/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$28,075.31 Total: \$41,725.31	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$20,446.73 Total: \$20,446.73	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$20,446.73 Total: \$20,446.73	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
24) Michael J Zimmerman 9250 Valley Rd Oconomowoc, WI 53066	20-43597	Briggs & Stratton Corporation	810	9/28/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$52,901.91 Unsecured: \$0.00 Total: \$52,901.91	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$39,251.91 Total: \$39,251.91	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$39,251.91 Total: \$39,251.91	Employee was paid \$13,650 under the wage motion. Remaining severance does not qualify as a priority claim	
25) Michael J. Padovano N59W24569 Quail Run Lane Sussex, WI 53089	20-43597	Briggs & Stratton Corporation	235	8/17/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$9,438.00 Total: \$23,088.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$9,438.04 Total: \$9,438.04	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$9,438.04 Total: \$9,438.04	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
26) Nancy J Gentz 1182 Hunter Ridge Ellijay, GA 30540	20-43597	Briggs & Stratton Corporation	1931	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$1,755.90 Unsecured: \$0.00 Total: \$1,755.90	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$1,755.90 Total: \$1,755.90	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$1,755.90 Total: \$1,755.90	Agreed severance amount after payment of \$13,650 in accordance with the Wage Order is a general unsecured claim and does not qualify for administrative claim status.	
27) Neal J Anderson W220N8306 Townline Rd Menomonee Falls, WI 53051	20-43597	Briggs & Stratton Corporation	421	9/9/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$34,168.33 Total: \$47,818.33	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$34,168.33 Total: \$34,168.33	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$34,168.33 Total: \$34,168.33	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
28) Nicole A. Wilson W329S3089 Bryn Mawr Road Dousman, WI 53118	20-43597	Briggs & Stratton Corporation	795	9/27/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$9,354.46 Unsecured: \$0.00 Total: \$9,354.46	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$9,354.46 Total: \$9,354.46	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$9,354.46 Total: \$9,354.46	The claim is for employee tuition reimbursement, which does not qualify for treatment as a Priority claim.	
29) Pamela J Mcevoy 17121 West National Aven New Berlin, WI 53151	20-43597	Briggs & Stratton Corporation	858	9/15/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$23,159.49 Total: \$36,809.49	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$5,870.00 Total: \$5,870.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$5,870.00 Total: \$5,870.00	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
30) Patrick H Latunski 1632 Keli Jean Ct. Hubertus, WI 53033-5303	20-43597	Briggs & Stratton Corporation	404	9/9/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$15,247.82 Total: \$28,897.82	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$5,615.21 Total: \$5,615.21	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$5,615.21 Total: \$5,615.21	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
31) Randall Jay Klotka 820 Prairie Run Grafton, WI 53024	20-43597	Briggs & Stratton Corporation	341	9/2/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$34,567.55 Total: \$48,217.55	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$34,567.55 Total: \$34,567.55	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$34,567.55 Total: \$34,567.55	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
32) Robert Johnson 13665 W Cleveland Ave New Berlin, WI 53151	20-43597	Briggs & Stratton Corporation	219	8/12/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$23,667.10 Unsecured: \$0.51 Total: \$23,667.61	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$11,451.45 Total: \$11,451.45	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$11,451.45 Total: \$11,451.45	Employee was paid \$13,650 under the wage motion. Remaining severance does not qualify as a priority claim	
33) Robert M. Johnson 1725 Steeple Dr. East Troy, WI 53120-2055	20-43597	Briggs & Stratton Corporation	793	9/26/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$31,016.50 Total: \$31,016.50	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$21,462.50 Total: \$21,462.50	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$21,462.50 Total: \$21,462.50	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	

Exhibit A  
Briggs & Stratton Corp., et al.

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Modified Claim Amount and		Basis for Proposed Modification
					Claim Amount and Priority	Priority	Priority	Priority	
34) Ryan M. Guilette N6495 Lakeshore Drive Tony, WI 54563	20-43597	Briggs & Stratton Corporation	923	9/15/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$59,317.00 Total: \$72,967.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$51,644.19 Total: \$51,644.19	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$51,644.19 Total: \$51,644.19	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
35) Scott A Funke 4093 S Wilshire Ct New Berlin, WI 53151-5261	20-43597	Briggs & Stratton Corporation	1455	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$23,133.18 Total: \$36,783.18	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$23,133.00 Total: \$23,133.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$23,133.00 Total: \$23,133.00	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
36) Steven Kruger W292N4275 Prairie Wind Cir N Pewaukee, WI 53072	20-43597	Briggs & Stratton Corporation	695	9/21/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$73,568.11 Total: \$87,218.11	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$27,253.14 Total: \$27,253.14	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$27,253.14 Total: \$27,253.14	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
37) Steven P Tkachuk W151N10713 Preserve Py Germantown, WI 53022	20-43597	Briggs & Stratton Corporation	558	9/14/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$3,349.88 Unsecured: \$45,821.79 Total: \$49,171.67	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$35,521.67 Total: \$35,521.67	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$35,521.67 Total: \$35,521.67	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
38) Thomas Gerard Glatch 1855 San Fernando Dr. Elm Grove, WI 53122	20-43597	Briggs & Stratton Corporation	2006	10/1/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$10,155.95 Total: \$10,155.95	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$7,991.74 Total: \$7,991.74	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$7,991.74 Total: \$7,991.74	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	
39) Thomas M. Burkard N61 W29060 Parkside PL Hartland, WI 53029	20-43597	Briggs & Stratton Corporation	1539	10/6/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$89,927.71 Total: \$89,927.71	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$1,427.71 Total: \$1,427.71	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$1,427.71 Total: \$1,427.71	The asserted claim includes amounts for Long Term Incentive Compensation, which are disallowed as the requirements for a change in control did not occur.	
40) Timothy G. Wild 136 Legend Way Wales, WI 53183	20-43597	Briggs & Stratton Corporation	1388	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$76,753.82 Total: \$90,403.82	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$40,877.76 Total: \$40,877.76	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$40,877.76 Total: \$40,877.76	Reduced for payments already made to claimant. Employee was paid \$13,650 under the wage motion.	

**EXHIBIT B**

**Halperin Claims Declaration**

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
SOUTHEASTERN DIVISION

<b>In re:</b>	§	<b>Chapter 11</b>
	§	
<b>BRIGGS &amp; STRATTON</b>	§	<b>Case No. 20-43597-399</b>
<b>CORPORATION, et al.,</b>	§	
	§	<b>(Jointly Administered)</b>
	§	
<b>Debtors.</b>	§	

**DECLARATION OF ALAN D. HALPERIN IN SUPPORT OF THE  
PLAN ADMINISTRATOR'S TWENTY-NINTH OMNIBUS OBJECTION  
TO CLAIMS (REDUCED AND RECLASSIFIED CLAIMS)**

I, Alan D. Halperin, solely in my capacity as Plan Administrator in the above-referenced cases, make this declaration (the “**Declaration**”) under 28 U.S.C. § 1746:

1. I am the Plan Administrator of the Wind-Down Estates of Briggs & Stratton Corporation and its affiliated debtors (the “**Debtors**”).<sup>1</sup>

2. Except as otherwise indicated, this Declaration is based upon my personal knowledge; my review of relevant documents (including, but not limited to, the Reduced and Reclassified Claims, and the Objection); information provided to me by: (i) a former officer of the Debtors with whom the Wind-Down Estates have entered into a consulting agreement, (ii) former employees that were transferred to the Purchaser and who provide claims reconciliation services to the Debtors pursuant to a transition services agreement with the Purchaser, (iii) the Debtors’ legal and financial advisors, and/or (iv) my legal counsel and such professionals working directly with me or under my supervision, direction, or control; or my opinion, based upon my experience, knowledge, and information concerning the Debtors’ operations. If called upon to testify, I would testify competently to the facts set forth herein. I am authorized to submit this Declaration on

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



behalf of the Wind-Down Estates, in support of *The Plan Administrator's Twenty-Ninth Omnibus Objection to Claims (Reduced and Reclassified Claims)* (the “**Objection**”).

3. To the best of my knowledge, information, and belief, the assertions made in the Objection are accurate. I can confirm that the Debtors’ advisors have examined each Reduced and Reclassified Claim, all documentation provided by the Claimant with respect to each Reduced and Reclassified Claim, the Debtors’ respective Books and Records, and the Schedules, and have determined that each Reduced and Reclassified Claim should be reduced and reclassified.

4. I declare under penalty of perjury that, to the best of my knowledge and after reasonable inquiry, the foregoing is true and correct.

Dated: November 2, 2021

/s/ Alan D. Halperin  
Alan D. Halperin  
Solely in His Capacity as Plan Administrator