

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

In re:)
)
JEFFERSON COUNTY, ALABAMA, a) Case No. 11-05736-TBB9
political subdivision of the State of)
Alabama,) Chapter 9
)
)
Debtor)

**OBJECTION TO REJECTION OF EXECUTORY CONTRACT AND REQUEST FOR
ADDITIONAL TIME AND FOR A HEARING**

Longmeadow, LLC (“Longmeadow”), for its Objection to Rejection of Executory Contract and Request for Additional Time and for a Hearing, asserts the following:

1. Pursuant to an Agreement with Jefferson County, Alabama (“County”) dated November 21, 2003 (Approved November 18, 2001 Minute Book 143, pages 276-277), Longmeadow constructed a sewer trunk line for the County (that would serve more property than the Longmeadow development) and the County agreed to pay for the trunk line by remitting future sewer impact fees to Longmeadow.

2. The County’s Plan rejects all executory contracts that are not being expressly assumed. Longmeadow is informed that the County wants to reject its contract.

3. Longmeadow generally objects to the rejection of its contract. Longmeadow requests additional time to investigate and assert any defenses that it may have to any such rejection, including whether or not the contract is actually executory or there exist special circumstances that would prevent rejection.



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WHEREFORE, PREMISES CONSIDERED, Longmeadow requests this Court to set this matter for hearing on a date after the conclusion of the confirmation hearing.

Respectfully submitted,

/s/ David B. Anderson

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing Notice of Appearance has been served via the Court's CM/ECF electronic noticing system on the 21st day November, 2013.

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