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Counsel for GUC Recovery Trustee

**UNITED STATES BANKRUPTCY COURT
 SOUTHERN DISTRICT OF NEW YORK**

.....	X	
In re:	:	Chapter 11
	:	
JCK LEGACY COMPANY, <i>et al.</i> ,	:	Case No. 20-10418 (MEW)
	:	
Debtors. ¹	:	(Jointly Administered)
	:	
.....	X	Related Docket No. 1476

**CERTIFICATE OF NO OBJECTION TO GUC RECOVERY TRUSTEE’S
 FOURTEENTH OMNIBUS OBJECTION TO INDIVIDUAL PENSION CLAIMS
 FILED BY JEANNE M. BENSON, BETTIE DOWNING, AND DEHLIA LACASSE**

The undersigned counsel to William A. Brandt, Jr., trustee (the “**GUC Recovery Trustee**”) of the JCK GUC Recovery Trust established under the GUC Recovery Trust Agreement and the confirmed *First Amended Joint Chapter 11 Plan of Distribution of JCK Legacy Company and Its Affiliated Debtors and Debtors in Possession* [Docket No. 879], respectfully states:

1. On June 16, 2022, the GUC Recovery Trustee filed and served the *GUC Recovery Trustee’s Fourteenth Omnibus Objection to Individual Pension Claims Filed By Jeanne M. Benson, Bettie Downing, and Dehlia Lacasse* (the “**Objection**”) [Docket No. 1476].

¹ The Debtors in these chapter 11 cases and the last four characters of each Debtor’s tax identification number are: JCK Legacy Company (0478) and Herald Custom Publishing of Mexico, S. de R.L. de C.V. (5UZ1). The location of the GUC Recovery Trustee’s service address for purposes of these chapter 11 cases is: 110 East 42 Street, Suite 1818 New York, NY 10017.



2. The Notice to the Objection stated that responses to the Objection were to be filed, served, and received no later than July 13, 2022 at 4:00 p.m. (ET).

3. Bettie Downing responded to the Objection to inquire whether the Objection would impact her pension checks. The undersigned counsel filed a statement regarding Ms. Downing's response and addressed Ms. Downing's concerns. The undersigned counsel certifies that no other formal or informal response to the Objection has been received, and that he has reviewed the docket in this case and no response to the Objection appears thereon.

4. In accordance with the Rule 9075-2 of the Local Bankruptcy Rules for the Southern District of New York, this certificate is being filed at least forty-eight (48) hours after expiration of the deadline to file and serve a response to the Objection.

5. Due to the forgoing, it is respectfully requested that the Court enter the Proposed Order attached as **Exhibit A**, a blacklined version of which order against the original version is attached as **Exhibit B**.

Dated: July 15, 2022
New York, New York

/s/ Leo T. Crowley
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Counsel for GUC Recovery Trustee

Exhibit A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

----- X
In re: : Chapter 11
: :
JCK LEGACY COMPANY, *et al.*, : Case No. 20-10418 (MEW)
: :
Debtors.¹ : (Jointly Administered)
: :
----- X

Related Docket No. 1476

**ORDER GRANTING GUC RECOVERY TRUSTEE’S FOURTEENTH
OMNIBUS OBJECTION TO INDIVIDUAL PENSION CLAIMS FILED
BY JEANNE M. BENSON, BETTIE DOWNING, AND DEHLIA LACASSE**

Upon consideration of the *GUC Recovery Trustee’s Fourteenth Omnibus Objection to Individual Pension Claims Filed By Jeanne M. Benson, Bettie Downing, and Dehlia LaCasse* (the “**GUC Recovery Trustee’s Fourteenth Omnibus Objection**”) to disallow and expunge the claims identified on Schedule 1 to this Order; and a Certificate of No Objection to the GUC Recovery Trustee’s Fourteenth Omnibus Objection having been filed on July 15, 2022; and the Court having jurisdiction under 28 U.S.C. §§ 157 and 1334 to consider the GUC Recovery Trustee’s Fourteenth Omnibus Objection and relief requested; and the GUC Recovery Trustee’s Fourteenth Omnibus Objection and relief requested being a core proceeding under 28 U.S.C. § 157(b)(2); and venue being proper before this Court under 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the GUC Recovery Trustee’s Fourteenth Omnibus Objection having been provided; and it appearing that no other notice is needed; and such relief being in the best interests of the Debtors’ estates and their creditors, and the GUC Recovery Trust²; and the Court having considered all papers submitted; and for good cause shown;

¹ The Debtors in these chapter 11 cases and the last four characters of each Debtor’s tax identification number are: JCK Legacy Company (0478) and Herald Custom Publishing of Mexico, S. de R.L. de C.V. (SUZ1). The location of the GUC Recovery Trustee’s service address for purposes of these chapter 11 cases is: 110 East 42 Street, Suite 1818 New York, NY 10017.

² Capitalized terms used and not otherwise defined herein shall have the meaning ascribed to them in the GUC Recovery Trustee’s Fourteenth Omnibus Objection.

It is hereby **ORDERED** that:

1. The GUC Recovery Trustee's Fourteenth Omnibus Objection is **SUSTAINED** to the extent set forth herein.
2. The claims identified on Schedule 1 to this Order are disallowed and expunged in their entirety.
3. The GUC Recovery Trustee or the claims agent is authorized and directed to modify the claims register in accordance with the terms of this Order.
4. The Court shall retain jurisdiction over any matter arising from or related to the implementation of this Order.

Dated: July ____, 2022
New York, NY

Michael E. Wiles
United States Bankruptcy Judge

Schedule 1

Individual Pension Claims

Name of Claimant	Date Filed	Proof of Claim No.	Proof of Claim Amount	Reason for Disallowance
Jeanne M. Benson	02/07/2022	2723	\$24,000	Claim was filed after the General Bar Date and is based on benefits owed under the McClatchy Company Retirement Plan, a qualified single-employer defined benefit pension plan
Dehlia LaCasse	05/14/2022	2727	\$9,301.00	Claim was filed after the General Bar Date and is based on benefits owed under the McClatchy Company Retirement Plan, a qualified single-employer defined benefit pension plan
Bettie Downing	05/24/2022	2728	Unliquidated	Claim was filed after the General Bar Date and is based on benefits owed under the McClatchy Company Retirement Plan, a qualified single-employer defined benefit pension plan

Exhibit B

Blacklined Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

----- X
In re: : Chapter 11
: :
JCK LEGACY COMPANY, *et al.*, : Case No. 20-10418 (MEW)
: :
Debtors.¹ : (Jointly Administered)
: :
----- X [Related Docket No. 1476](#)

**ORDER GRANTING GUC RECOVERY TRUSTEE'S FOURTEENTH
OMNIBUS OBJECTION TO INDIVIDUAL PENSION CLAIMS FILED
BY JEANNE M. BENSON, BETTIE DOWNING, AND DEHLIA LACASSE**

Upon consideration of the *GUC Recovery Trustee's Fourteenth Omnibus Objection to Individual Pension Claims Filed By Jeanne M. Benson, Bettie Downing, and Dehlia LaCasse* (the "**GUC Recovery Trustee's Fourteenth Omnibus Objection**") to disallow and expunge the claims identified on Schedule 1 to [this Order; and a Certificate of No Objection to](#) the GUC Recovery Trustee's Fourteenth Omnibus Objection [having been filed on July 15, 2022](#); and the Court having jurisdiction under 28 U.S.C. §§ 157 and 1334 to consider the GUC Recovery Trustee's Fourteenth Omnibus Objection and relief requested; and the GUC Recovery Trustee's Fourteenth Omnibus Objection and relief requested being a core proceeding under 28 U.S.C. § 157(b)(2); and venue being proper before this Court under 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the GUC Recovery Trustee's Fourteenth Omnibus Objection having been provided; and it appearing that no other notice is needed; and such relief being in the best interests of the Debtors' estates and their creditors, and the GUC Recovery Trust²; and the Court having considered all papers submitted; and for good cause shown;

¹ The Debtors in these chapter 11 cases and the last four characters of each Debtor's tax identification number are: JCK Legacy Company (0478) and Herald Custom Publishing of Mexico, S. de R.L. de C.V. (SUZ1). The location of the GUC Recovery Trustee's service address for purposes of these chapter 11 cases is: 110 East 42 Street, Suite 1818 New York, NY 10017.

² Capitalized terms used and not otherwise defined herein shall have the meaning ascribed to them in the GUC Recovery Trustee's Fourteenth Omnibus Objection.

It is hereby **ORDERED** that:

1. The GUC Recovery Trustee's Fourteenth Omnibus Objection is **SUSTAINED** to the extent set forth herein.
2. The claims identified on Schedule 1 to ~~the GUC Recovery Trustee's Fourteenth Omnibus Objection~~this Order are disallowed and expunged in their entirety.
3. The GUC Recovery Trustee or the claims agent is authorized and directed to modify the claims register in accordance with the terms of this Order.
4. The Court shall retain jurisdiction over any matter arising from or related to the implementation of this Order.

Dated: July ____, 2022
New York, NY

Michael E. Wiles
United States Bankruptcy Judge

Schedule 1

Individual Pension Claims

<u>Name of Claimant</u>	<u>Date Filed</u>	<u>Proof of Claim No.</u>	<u>Proof of Claim Amount</u>	<u>Reason for Disallowance</u>
<u>Jeanne M. Benson</u>	<u>02/07/2022</u>	<u>2723</u>	<u>\$24,000</u>	<u>Claim was filed after the General Bar Date and is based on benefits owed under the McClatchy Company Retirement Plan, a qualified single-employer defined benefit pension plan</u>
<u>Dehlia LaCasse</u>	<u>05/14/2022</u>	<u>2727</u>	<u>\$9,301.00</u>	<u>Claim was filed after the General Bar Date and is based on benefits owed under the McClatchy Company Retirement Plan, a qualified single-employer defined benefit pension plan</u>
<u>Bettie Downing</u>	<u>05/24/2022</u>	<u>2728</u>	<u>Unliquidated</u>	<u>Claim was filed after the General Bar Date and is based on benefits owed under the McClatchy Company Retirement Plan, a qualified single-employer defined benefit pension plan</u>

Summary report:	
Litera® Change-Pro for Word 10.14.0.46 Document comparison done on 7/14/2022 4:25:25 PM	
Style name: Default Style	
Intelligent Table Comparison: Active	
Original DMS: nd://4872-2517-7897/1/Proposed Order to Pension Claims Objection.docx	
Modified DMS: nd://4872-2517-7897/2/Proposed Order to Pension Claims Objection.docx	
Changes:	
Add	10
Delete	3
Move From	0
Move To	0
Table Insert	1
Table Delete	0
Table moves to	0
Table moves from	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
Total Changes:	14