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Motion authorizing abandonment and destruction of certain documents.

Trustee's objection to proof of claim no. 2729 filed by Nirva Boursiquot.

Trustee's objection to proof of claim no. 2725 filed by Alberto Colt-Sarmiento on the merits.

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A P P E A R A N C E S (All present by video or telephone):

PILLSBURY WINTHROP SHAW PITTMAN LLP

Attorneys for GUC Recovery Trustee, William Brandt

31 West 52nd Street

New York, NY 10019

BY: LEO T. CROWLEY, ESQ.  
PATRICK E. FITZMAURICE, ESQ.  
KWAME O. AKUFFO, ESQ.

ALSO PRESENT:

WILLIAM A. BRANDT, JR., GUC Recovery Trustee  
NIRVA BOURSIQUOT, Pro Se  
YALE BOGEN, Development Specialists, Inc.

JCK LEGACY COMPANY, ET AL.

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1 P R O C E E D I N G S

2 THE COURT: Good morning, everybody.

3 Mr. Crowley, are you ready to proceed?

4 MR. CROWLEY: We are, Your Honor. Good morning. Leo  
5 Crowley, of Pillsbury Winthrop Shaw Pittman, for William  
6 Brandt, in his capacity as the GUC recovery trustee in the JCK  
7 Legacy case.

8 I'm in a conference room in my office with two of my  
9 colleagues, Patrick Fitzmaurice and Kwame Akuffo. And I hope  
10 it's acceptable to the Court, they have not separately logged  
11 into Court Solutions. I wasn't sure if that would work. So  
12 we're all sitting in one room. I noted in the SAS first day  
13 hearings, that Gary Holtzer had some of his colleagues, and  
14 that's the way they handled it, so I hope that's acceptable.

15 THE COURT: I think that's fine.

16 MR. CROWLEY: Okay.

17 So we're down to three matters on this morning's  
18 agenda, Your Honor. Two of them, I think Your Honor already  
19 signed orders after we filed certificates of no objection. A  
20 third matter was withdrawn by us yesterday, because of an  
21 amended claim filed by the creditor -- that was the Sacramento  
22 landlord -- which has rendered our motion, at least  
23 temporarily, moot, and almost certainly permanently moot. And  
24 I'm happy to report the amended claim is significantly smaller  
25 than the original claim, so we're going in the right direction.

1           So we've got three remaining matters on for today. We  
2 have the motion for authorization to abandon and destroy  
3 documents. We've got the objection to claim 2727 (sic) filed  
4 by Nirva Boursiquot. And we've got the objection to claim  
5 2725, filed by Alberto Colt-Sarmiento. So unless Your Honor  
6 prefers, I would suggest we simply go in the order that they're  
7 on the agenda.

8           THE COURT: That's fine.

9           MR. CROWLEY: Okay. So I'm going to turn the virtual  
10 podium over to Kwame Akuffo, who will handle the first motion.

11          MR. AKUFFO: Good morning.

12          THE COURT: Very good.

13          MR. AKUFFO: Oh, sorry. Good morning, Your Honor.

14 Kwame Akuffo, on behalf of the GUC recovery trustee. As my  
15 partner, Mr. Crowley stated, the first matter on the agenda is  
16 the GUC recovery trustee's motion for authorization to abandon  
17 and destruct certain documents at docket number 1482.

18           Those documents contain discovery material that relate  
19 to the Lorianne Sawin and the Veronica Becerra class actions  
20 the debtors were involved in, in a California state court,  
21 concerning unreimbursed mileage expenses. The documents -- as  
22 stated in the motion, the documents were stored in a warehouse,  
23 after New McClatchy released them to the GUC recovery trustee,  
24 who continues to incur cost to store and maintain them, as the  
25 invoice attached as Exhibit B to the motion shows.

1           Now during the bankruptcy case, the class  
2 representatives in each class action filed a proof of claim,  
3 which were resolved pursuant to class action settlements  
4 entered into by the GUC recovery trustee and each class  
5 representatives, and approved by the Court for Sawin at docket  
6 1265, and Becerra at docket number 1474.

7           Now since each class claim has been resolved, the  
8 documents are of inconsequential value, and provide no benefit  
9 to the estate, and thus, the GUC recovery trustee respectfully  
10 requests that the documents be destroyed. As stated in the  
11 motion, destruction is certainly necessary to avoid the risk of  
12 inadvertent disclosure, since the documents contain personal  
13 information that raise privacy concerns.

14           Now after the filing, we received several responses to  
15 the motion, mainly inquiries about the basis of the motion, and  
16 whether the claimant was obligated to pay the invoice attached  
17 thereto. We filed a statement regarding responses received at  
18 docket number 1489, in which we explain that each claimant was  
19 informed about the basis for the motion and told that the  
20 motion did not apply to them, and that they were not being  
21 asked to pay the invoice attached to the motion.

22           And so, Your Honor, for all the reasons stated on the  
23 record today, and given that no one challenged the motion, the  
24 GUC recovery trustee respectfully requests that the motion be  
25 granted.

1 THE COURT: Are these original records, or are they  
2 copies that New McClatchy gave to you?

3 MR. AKUFFO: Copies that New McClatchy gave to us.

4 THE COURT: Oh. New McClatchy still has the  
5 originals?

6 MR. CROWLEY: They should, Your Honor. We'll  
7 doublecheck with them -- it's Leo Crowley -- but they were  
8 going to discard them, because these were production copies in  
9 connection with the litigation, and we actually got into a  
10 tussle with New McClatchy, because they were moving out of the  
11 Sacramento building, which actually is the same real estate  
12 that was the subject of the Rule 2004 motion we withdrew. But  
13 they were moving out of the building, and they kind of said to  
14 us, we're going to toss them; it's on you if you want to save  
15 them for purposes of the bankruptcy and the litigation or not,  
16 so. We can place one more call to them, but they were quite --  
17 their inside lawyer was quite firm he didn't want them.

18 THE COURT: It's the discovery record, then?

19 MR. CROWLEY: Right.

20 THE COURT: Okay. All right.

21 I'll grant that motion. That's just fine.

22 MR. AKUFFO: Thank you, Your Honor.

23 MR. CROWLEY: Thank you, Your Honor.

24 And then I'll now turn the virtual podium over to  
25 Patrick Fitzmaurice, to deal with the objection to the Nirva

1 Boursiquot proof of claim, and I see that Ms. Boursiquot is in  
2 the virtual courtroom.

3 MR. FITZMAURICE: So good morning, Your Honor.  
4 Patrick Fitzmaurice from Pillsbury for Mr. Brandt, the GUC  
5 recovery trustee. Ms. Boursiquot filed this proof of claim in  
6 June of this year, almost a year after we filed a pleading in  
7 the Florida action in which --

8 THE COURT: Can I interrupt? Can I interrupt --

9 MR. FITZMAURICE: Yes, Your Honor.

10 THE COURT: -- for a second? Does the claimant have  
11 counsel?

12 MR. FITZMAURICE: Your Honor, I understand that Ms.  
13 Boursiquot is represented in the Florida action. The claim and  
14 the response to the objection were filed by Ms. Boursiquot, pro  
15 se. I do see on the Court Solutions screen that counsel is on  
16 a listen-only line, but I believe for purposes of the  
17 objection, my understanding is that Ms. Boursiquot is not  
18 represented, although she can clearly correct me.

19 MS. BOURSQUOT: Good morning. Can you -- is my  
20 technology working? Can everyone hear me?

21 THE COURT: Yes.

22 MS. BOURSQUOT: Okay. Good morning, Your Honor. I'm  
23 Mrs. Boursiquot. I'm here in pro se capacity.

24 THE COURT: Okay. Let's make sure we pronounce your  
25 name correctly as it -- did you just say it was [Bor-si'-ko]?

JCK LEGACY COMPANY, ET AL.

1 MS. BOURSIQUOT: It's [Bor'-si-ko], yes.

2 THE COURT: [Bor'-si-ko], thank you.

3 MS. BOURSIQUOT: Um-hum. Thank you.

4 THE COURT: Go ahead, Counsel.

5 MR. FITZMAURICE: Thank you.

6 So first of all, Ms. Boursiquot, apologies for the  
7 mispronunciation. I will do my best to make sure that I get it  
8 correct.

9 So, Your Honor, we understand that both inside lawyers  
10 from McClatchy, as well as ourselves, me personally, have had  
11 conversations with Ms. Boursiquot's counsel, concerning the  
12 need to file a claim, the passage of the bar date, and in  
13 general, the need to file a claim. That those conversations  
14 began last year, in July and August of 2021. No claim was  
15 filed at that time.

16 As I was saying before, we filed a pleading in the  
17 Florida Southern District, in response to a motion to enter a  
18 default judgment against the JCK Legacy Company Services  
19 business, that's the successor to the entity that Ms.  
20 Boursiquot worked for. In our opposition to the motion for a  
21 default judgment, we indicated that we had a meritorious  
22 defense, that defense being the bar date order, and the  
23 requirement that Ms. Boursiquot file the claim, and that as of  
24 the date of that filing, no claim had been filed.

25 In January of this year, the magistrate judge to whom

1 that motion was referred in Florida agreed with us, and issued  
2 a report and recommendation that the default judgment motion be  
3 denied on the grounds that we had a meritorious defense, that  
4 being again, the passage of the bar date order and the lack of  
5 any claim being filed. In February of this year, Ms.  
6 Boursiquot submitted a declaration in the Florida action, in  
7 which she indicated that she was in the process of filing a  
8 claim. And it was more than four months after that that the  
9 claim was finally filed.

10 The response to the objection that Ms. Boursiquot  
11 filed indicates that her position is that her counsel never  
12 told her about the need to file a claim, and effectively, that  
13 she should not be stuck with, if you will, counsel's mistake or  
14 error. But that's not the law, Your Honor. Both in Pioneer  
15 itself, and in other cases, that have followed it in the Second  
16 Circuit, the courts have been clear that mistakes or  
17 misreadings of rules or statutes by counsel will impact the  
18 client's rights, including even in criminal matters. And so we  
19 submit the fact that counsel knew indisputably as of sometime  
20 last year, shows that Ms. Boursiquot does not have -- there is  
21 no case for excusable neglect given the failure to file a  
22 claim -- a timely claim.

23 But also, even if it was the case that Ms. Boursiquot  
24 was not charged with her counsel's knowledge and inaction, that  
25 the period of time from the court -- the Florida court's order

1 in January or even calculated from the date of the declarations  
2 submitted in Florida, until the date that the claim was finally  
3 filed, that that time period is overly lengthy, does not show  
4 reasonably prompt action. It does not meet the excusable  
5 neglect standard. As Your Honor indicated in a prior matter  
6 involving a claim filed by a Mr. Mulliger (ph.), that four-  
7 month period is longer even than the initial bar date period  
8 that applied in these cases.

9 So happy to answer any questions that Your Honor has  
10 on this point.

11 THE COURT: On the four Pioneer factors, one of them  
12 is prejudice. What is the nature of the prejudice that you  
13 claim that would occur if I were to allow this late filing?

14 MR. FITZMAURICE: Your Honor, as Your Honor knows,  
15 under Pioneer, that the reason for the delay and the excusable  
16 neglect standard is by far the most important, and the other  
17 factors only apply in close cases, and we don't think that  
18 that's -- we don't think we have a close case here.

19 The prejudice, Your Honor, relates to the  
20 administration of the estate. We are in the process, Your  
21 Honor -- I mean, I know we've got one more omnibus hearing on  
22 the calendar -- we are in the process of cleaning up the claims  
23 register. There are only a couple of matters that remain to be  
24 resolved. And the prejudice is that this would be a matter  
25 that would continue on and require additional efforts by the

1 trustee to reconcile the claim, and potentially give rise to --  
2 well, and resolve -- the prejudice is the time and expense that  
3 would be required to resolve what is undisputedly an untimely  
4 claim.

5 THE COURT: Ms. Boursiquot, I have some questions for  
6 you, but first I'll let you go ahead and tell me what you think  
7 I need to know in connection with this, okay?

8 MS. BOURSQUOT: You can proceed with the questions.

9 THE COURT: Ms. Boursiquot? Ms. Boursiquot, are you  
10 still there?

11 MS. BOURSQUOT: Yes. Can you hear me?

12 THE COURT: Now I can hear you. I couldn't for --

13 MS. BOURSQUOT: Okay. My fault, apologies, Your  
14 Honor. You can proceed with the questions, Your Honor.

15 THE COURT: Okay. Counsel says that there was a  
16 conversation on October 19th of 2020, either with you or with  
17 your counsel, about the bar date. Do you dispute whether that  
18 took place?

19 MS. BOURSQUOT: I dispute that. I was not aware of  
20 that conversation.

21 THE COURT: Well, you may not have been aware of it,  
22 but do you dispute that a conversation took place?

23 MS. BOURSQUOT: I dispute the conversation took  
24 place, yes.

25 THE COURT: All right. And then counsel contends that

1 in the Florida proceedings, papers were filed that mention the  
2 bar date. Do you dispute that?

3 MS. BOURSIQUOT: Can you repeat the question, please?

4 THE COURT: Yes. The objection states that during the  
5 proceedings in Florida, the trust filed papers that mention the  
6 bar date, and the fact that you had an obligation to file a  
7 claim by the bar date. Do you dispute that that happened?

8 MS. BOURSIQUOT: I do not dispute that.

9 THE COURT: Okay. So when you saw the references to  
10 the bar date in their papers, what did you do?

11 MS. BOURSIQUOT: I tried to seek counsel in the matter  
12 of figuring out what the next step would be. My understanding  
13 was that even if I filed, or -- that I was going to be  
14 rejected, and so I was leaning on my -- the counsel that I had  
15 to give me feedback, or the legal -- just steps that I needed  
16 to take in regards to the matter, because I did seek counsel  
17 from before the bankruptcy hearing even started.

18 THE COURT: And you eventually did file a claim. What  
19 changed your mind?

20 MS. BOURSIQUOT: Just seeking information at this  
21 point. We had some conversations with, I believe, Mr.  
22 Fitzpatrick (sic).

23 I'm sorry if I said your name wrong.

24 And it seemed the conversation was changing, but part  
25 of the conversation was contingent upon saying, hey, she still

1 needs to file this, and there might be some consideration if  
2 she files this, but without it being filed, we can't have that  
3 conversation. And so, it was almost like a catch-22, that I  
4 needed to file it, and without it I wouldn't -- there was no  
5 way to even move this conversation forward.

6 THE COURT: When you say that you spoke to counsel  
7 about whether to file, and you concluded that it would just be  
8 rejected, when did that happen?

9 MS. BOURSIQUOT: As of recently -- recent  
10 conversations, probably within the -- I can't pinpoint an exact  
11 date, Your Honor, but within the last two to three months prior  
12 to the filing.

13 THE COURT: All right. Now, the objection says that  
14 in February, you filed a declaration in the Florida court  
15 saying that you were going to pursue a claim. Did you file  
16 such a declaration?

17 MS. BOURSIQUOT: I did file the declaration, sir --  
18 Your Honor. Apologies.

19 THE COURT: And why did it take so long from February  
20 until June before you actually filed a claim?

21 MS. BOURSIQUOT: I was advised not to file, because it  
22 was going to get rejected, and that we were moving forward with  
23 the Florida case.

24 THE COURT: Okay.

25 Mr. Fitzmaurice, in the Florida case, is there any

1 issue pending there as to whether the claim is timely or not?  
2 You're not asking me to rule on something that's already been  
3 briefed or ready for decision in Florida, are you?

4 MR. FITZMAURICE: In the Florida action, Your Honor,  
5 we have moved -- we have filed a motion to dismiss the  
6 complaint, or in the alternative, to transfer venue to this  
7 Court. Both motions on -- the first portion of motion on the  
8 ground that Ms. Boursiquot is limited to a recovery, pursuant  
9 to the plan mechanism, and cannot recover, because at the time  
10 we made the motion, she had not filed the claim. We have  
11 updated the court there that the fact the claim was filed.

12 The second portion of the motion, which seeks in the  
13 alternative to transfer venue, is on the grounds that the  
14 appropriate forum for resolution of Ms. Boursiquot's claim  
15 against the estate is through the claims process here.

16 And Your Honor, if I could just return to something  
17 else, briefly? Your Honor's question to Ms. Boursiquot  
18 mentioned a conversation that was from October of 2020. I just  
19 wanted to refer the Court to Exhibit 1 to our objection, which  
20 is a copy of the email that is that conversation that we had  
21 referred to in the objection.

22 THE COURT: Do you have that email, Ms. Boursiquot?  
23 Did you receive it at the time?

24 MS. BOURSQUOT: I received the email as a result of  
25 their objection, yes.

1 THE COURT: Okay. All right. But you dispute whether  
2 you received it in October of 2020?

3 MS. BOURSIQUOT: I -- yes, Your Honor, I do dispute  
4 that.

5 MR. FITZMAURICE: And Your Honor -- Patrick  
6 Fitzmaurice again. Just to be clear -- I want to make sure the  
7 record is clear. The email is not to Ms. Boursiquot, but is to  
8 her counsel, from in-house counsel at New McClatchy to her  
9 counsel. And it includes both reference to the fact of the  
10 bankruptcy filing, as well as a copy of the link to the KCC  
11 website.

12 THE COURT: All right.

13 Anything else that either of you wants to add?

14 MR. FITZMAURICE: Nothing for us, Your Honor.

15 THE COURT: All right. We'll issue an order on this  
16 that sets forth our reasons, but it appears as though, while  
17 there's some dispute about the original email, it appears that  
18 the claimant and her counsel were advised quite a long time ago  
19 of the existence of the bar date, and did not seek to file a  
20 claim until June of 2022, at least in part, because according  
21 to the claimant herself on the phone, she was advised that it  
22 would be rejected.

23 There are a lot of factors to be considered on motions  
24 for relief from the bar date. And we'll go through those in  
25 the order that we issue, but one of the things -- two of the

1 things that the courts have made clear is, number one, what the  
2 claimant's attorney knows is equivalent to what the claimant  
3 knows. The claimant can't show excusable neglect by contending  
4 that an attorney made an error, or failed to advise the client  
5 of something, or gave bad advice. Clients are responsible for  
6 their attorney's conduct as well, in that regard.

7 And number two, that if relief is sought on the -- and  
8 somebody seeks to excuse the delay in filing a claim, the  
9 entire delay has to be explained, not just the missing of the  
10 original bar date in 2020. And a decision to delay or not to  
11 proceed because of a belief that it wouldn't go anywhere is  
12 really not neglect. That's an intentional tactical choice, and  
13 that's not grounds for relief from the bar date.

14 So on the record in front of me, I will grant the  
15 motion. We'll issue something that describes those criteria a  
16 little bit more.

17 MR. CROWLEY: Your Honor, Leo Crowley again. That  
18 brings us to the final item on the agenda, which is mine, with  
19 is the Alberto Colt-Sarmiento claim. He is not in the virtual  
20 courtroom today.

21 I mean, just to recap this, Your Honor, and I don't  
22 know if you want to proceed without him or not --

23 THE COURT: Do you know if he made any attempt through  
24 the prison authorities to get permission to be on the call?

25 MR. CROWLEY: I don't. I mean, I have -- the letter

1 that we filed on the docket on Friday that he had sent to me  
2 and to Mr. Brandt, which I only received on Monday of this  
3 week. It took ten days to get -- it's postmarked on the 8th,  
4 and I didn't get it until the 18th. And it doesn't  
5 specifically address that issue, so I -- the short answer is I  
6 don't know. I mean, he complains vociferously about not  
7 getting adequate access to a computer in the prison law  
8 library, but I don't know if he's tried to get on the phone or  
9 not.

10 THE COURT: Lorraine or Jenna, did we get any  
11 inquiries from Mr. Colt-Sarmiento about ability to appear at  
12 the hearing today?

13 THE CLERK: Judge, this is Jenna. He has not reached  
14 out to us for phone -- to join by phone into any of the  
15 hearings.

16 THE COURT: Well, and Mr. Crowley, your preference is  
17 to just proceed, and not to allow additional time. Is that  
18 what I understand?

19 MR. CROWLEY: Well, yes, because Your Honor may  
20 recall, we actually are -- gave him a two month -- we consented  
21 to a two-month adjournment that was requested back in late  
22 April or early May. This was originally on the May omnibus,  
23 and he asked for a significant amount of additional time, all  
24 of which we consented to.

25 But at this point -- I mean, candidly, Judge, we think

1 the claim has no merit, and I don't have any basis for thinking  
2 that he'll be able to file any further papers or do anything  
3 further if we defer this to the August omnibus. So yeah, my  
4 preference would be to proceed on it today. I mean, I  
5 understand the Court's concern about him, making sure he has  
6 every possible chance, but it seems to me, he's gotten that.

7 THE COURT: Yeah, I mean, I don't know what his access  
8 to the law library situation is, but I can't tell the prison  
9 authorities to give him access if they don't want to.

10 All right. I'll take the matter under advisement  
11 then.

12 MR. CROWLEY: Okay. I'm happy to speak to it, but it  
13 sounds like Your Honor is prepared to just take it on yourself.  
14 I'm happy to argue it, if you like.

15 THE COURT: I've read the papers, and --

16 MR. CROWLEY: Okay.

17 THE COURT: -- it seems to me, the wording of the  
18 article doesn't technically say that Mr. Colt-Sarmiento was the  
19 author of the words that he's complaining about, but it sort of  
20 does suggest that by saying that he exchanged text messages  
21 that said those things, but it doesn't literally say that. And  
22 in context, as I understand it, the whole argument of the  
23 prosecutor was that it was a group plan to commit this crime,  
24 and that each one of them was responsible for -- and that  
25 somehow those comments actually reflected on the intent

1 relevant to Mr. Sarmiento (sic) himself. So ---

2 MR. CROWLEY: Well, exactly.

3 THE COURT: -- I'm not inclined to think that it  
4 really supports a defamation claim. But we'll issue something  
5 formal on it, okay?

6 MR. CROWLEY: Okay.

7 So I think we have nothing further today, Your Honor,  
8 and I don't think -- at the moment, I'm not sure we're going to  
9 have anything on the August omnibus hearing either. We'll see.  
10 I mean, we're reviewing a few things -- possible we'll have one  
11 or two things, but we're truly in the final throes of rooting  
12 out the last claim issues here.

13 THE COURT: Okay. Very good.

14 MR. CROWLEY: Thank you, Your Honor.

15 THE COURT: In that case, we are adjourned. Thank you  
16 very much.

17 (Whereupon these proceedings were concluded at 11:29 AM)

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I N D E X

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C E R T I F I C A T I O N

I, Karen Schiffmiller, certify that the foregoing transcript is  
a true and accurate record of the proceedings.



---

Karen Schiffmiller (CET-570)  
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Date: July 21, 2022

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