

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

In re:)	
)	Chapter 11
)	
PGX HOLDINGS, INC, <i>et al.</i> , ¹)	Case No. 23-10718 (CTG)
)	
Debtors.)	(Jointly Administered)
)	
)	Objection Deadline: April 12, 2024 at 4:00 p.m.
)	Hearing Date: May 15, 2024 at 11:00 a.m. (ET)

**PLAN ADMINISTRATOR’S FIFTH OMNIBUS OBJECTION
(SUBSTANTIVE) TO CERTAIN NO LIABILITY ARBITRATION CLAIMS,
NO LIABILITY TAX CLAIMS, AND NO LIABILITY NON-TAX CLAIMS**

TO THOSE HOLDERS OF CLAIMS ON SCHEDULES 1 THROUGH 3 TO THE PROPOSED ORDER ANNEXED HERETO AS EXHIBIT A:

- **YOUR SUBSTANTIVE RIGHTS MAY BE AFFECTED BY THIS OBJECTION AND BY ANY FURTHER OBJECTION THAT MAY BE FILED BY THE DEBTORS**
- **YOU ARE DIRECTED TO LOCATE YOUR CLAIM ON THE SCHEDULES TO THE PROPOSED ORDER**
- **THE RELIEF SOUGHT HEREIN IS WITHOUT PREJUDICE TO THE DEBTORS’ RIGHTS, OR THE RIGHTS OF OTHER PARTIES IN INTEREST, TO PURSUE FURTHER SUBSTANTIVE OR NON-SUBSTANTIVE OBJECTIONS AGAINST THE CLAIMS ADDRESSED HEREIN**

The plan administrator (the “Plan Administrator”) of the above-captioned debtors (the “Debtors”), hereby object, pursuant to sections 501 and 502 of title 11 of the United States Code (the “Bankruptcy Code”), rule 3007 of the Federal Rules of Bankruptcy Procedure

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



(the “Bankruptcy Rules”), and rule 3007-1 of the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), to certain of the following types of Claims (a) claims that assert an amount that is unliquidated and contingent that relate to prepetition arbitrations and for which the Debtors have no liability (the “No Liability Arbitration Claims”); (b) claims that assert a liability relating to a tax obligation that is not reflected in the Debtors’ Books and Records and is not supported by the documentation provided (the “No Liability Tax Claims”); and (c) claims that assert a liability for a non-tax obligation that has been otherwise satisfied (the “No Liability Non-Tax Claims,” together with the No Liability Arbitration Claims and the No Liability Tax Claims, the “Disputed Claims”) listed on **Schedule 1** through **Schedule 3** annexed to the proposed order attached hereto as **Exhibit A** (the “Proposed Order”). For the reasons set forth herein, the Debtors seek entry of the Proposed Order disallowing and/or modifying the Disputed Claims.

In support of this objection, the Plan Administrator submits the Declaration of Richard Niemerg (the “Niemerg Declaration,” a copy of which is attached hereto as **Exhibit B** and incorporated herein by reference), and respectfully represents as follows:

JURISDICTION

1. The United States Bankruptcy Court for the District of Delaware (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated February 29, 2012. Plan Administrator confirms his consent, pursuant to Local Rule 9013-1(f), to the entry of a final order by the Court in connection with this motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

3. The statutory predicates for the relief requested herein are sections 501 and 502 of the Bankruptcy Code.

RELIEF REQUESTED

4. For the reasons set forth in more detail below, and based on his review, the Plan Administrator has determined that the Disputed Claims filed in these cases are objectionable on substantive grounds and requests that they be modified or expunged as set forth on **Schedule 1** through **Schedule 3** to the Proposed Order.

BACKGROUND

5. On June 4, 2023 (the “Petition Date”), the Debtors filed with the Court voluntary petitions for relief under the Bankruptcy Code. During the pendency of their chapter 11 cases, the Debtors operated their business and managed their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

6. On July 19, 2023, the Court entered an *Order (A) Establishing Bar Dates for Filing Proofs of Claim, Including Claims Under 11 U.S.C. § 503(B)(9) and Administrative Expense Requests; (B) Approving the Form and Manner for Filing Proofs of Claim and Administrative Expense Requests; (C) Approving Notice Thereof; and (D) Granting Related Relief* [Docket No. 194] (the “Bar Date Order”), establishing, among other things, September 7, 2023 as the deadline for all non-governmental entities to file Proofs of Claim.

7. On December 26, 2023, the Court entered the *Findings of Fact, Conclusions of Law, and Order Approving the Debtors’ Disclosure Statement for, and Confirming the Second Amended Joint Chapter 11 Plan of PGX Holdings, Inc., and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 681] (the “Confirmation Order”) that confirmed

the *Second Amended Joint Plan of PGX Holdings, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 570] (the “Plan”). On December 26, 2023, the Effective Date of the Plan occurred. The Plan designated Mark A. Roberts of Alvarez & Marsal North America, LLC as the Plan Administrator. Under the Plan, the Plan Administrator is authorized to administer claims on the Debtors’ behalf.

8. On August 25, 2023, the Court entered orders [Docket No. 422 and 423] (together, the “Sale Orders”) approving (i) the Debtors’ entry into and performance under each of the Stalking Horse Agreements and authorizing the sale of substantially all of the Debtors’ assets free and clear of all liens, claims, interest, and encumbrances and (ii) the assumption by the Debtors and the assignment and sale to the Progrexion Purchaser or Lexington Law Purchaser (as applicable, the “Purchaser”) of executory contracts and unexpired leases to be designated by the Purchaser as “Assumed Contracts” pursuant to the Sale Orders, the Progrexion APA, the Lexington Law APA, and sections 363 and 365 of the Bankruptcy Code, subject to, and effective as of, the closing of the Sale Transactions (the date of the closing being the “Closing Date”). The Closing Date occurred on September 28, 2023.

9. In the ordinary course of business, the Debtors maintained books and records (the “Books and Records”) that reflect, among other things, the Debtors’ liabilities and the amounts owed to their creditors. The Plan Administrator and his advisors (collectively, the “Reviewing Parties”), have commenced a review of the Proofs of Claim filed in these cases, including any supporting documentation filed therewith and a comparison of these documents with the Books and Records to determine the validity of the Proofs of Claims. For the reasons set forth in more detail below, and based on this review, the Reviewing Parties have determined that the Disputed Claims filed in these cases are objectionable on substantive grounds.

OBJECTION

10. Section 502(a) of the Bankruptcy Code provides that “[a] claim or interest, proof of which is filed under section 501 of this title, is deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a). The burden of proof for determining the validity of claims rests on different parties at different stages of the objection process. As explained by the United States Court of Appeals for the Third Circuit:

The burden of proof for claims brought in bankruptcy court under 11 U.S.C. § 502(a) rests on different parties at different times. Initially, the claimant must allege facts sufficient to support the claim. If the averments in his filed claim meet this standard of sufficiency, it is ‘*prima facie*’ valid. [citations omitted]. In other words, a claim that alleges facts sufficient to support legal liability to the claimant satisfies the claimants’ initial obligation to go forward. The burden of going forward then shifts to the objector to produce evidence sufficient to negate the *prima facie* validity of the filed claim . . . In practice, the objector must produce evidence which, if believed, would refute at least one of the allegations that is essential to the claim’s legal sufficiency. If the objector produces sufficient evidence to negate one or more of the sworn facts in the proof of claim, the burden reverts to the claimant to prove the validity of the claim by a preponderance of the evidence.

In re Allegheny Int’l Inc., 954 F.2d 167, 173-74 (3d. Cir. 1992) (citation omitted). Once the *prima facie* validity of a claim is rebutted, “it is for the claimant to prove his claim, not for the objector to disprove it.” *In re Kahn*, 114 B.R. 40, 44 (Bankr. S.D.N.Y. 1990) (citations omitted).

11. A chapter 11 debtor has the duty to object to the allowance of any Claim that is improper. 11 U.S.C. §§ 704(a)(5), 1106(a)(1) and 1107(a); *see also Int’l Yacht & Tennis, Inc. v. Wasserman Tennis, Inc. (In re Int’l Yacht & Tennis, Inc.)*, 922 F.2d 659, 661-62 (11th Cir. 1991).

12. By this objection, the Plan Administrator requests that the Court enter an order, pursuant to sections 105(a) and 502(b) of the Bankruptcy Code, Bankruptcy Rule 3007 and Local Rule 3007-1, disallowing or modifying the Disputed Claims identified on **Schedule 1** through

Schedule 3 to the Proposed Order for the reasons set forth below and in the manner indicated thereon.

A. No Liability Arbitration Claims

13. As a result of its Books and Records review, the Reviewing Parties have identified certain Proofs of Claim that can be characterized as No Liability Arbitration Claims – Claims that assert liability in various arbitration proceedings that are unliquidated as of the date of its filing. The Plan Administrator objects to each such No Liability Arbitration Claim on the basis that these Claims were filed as unliquidated and thus, pursuant to section 502(c) of the Bankruptcy Code, cannot be allowed unless liquidated or estimated. The Reviewing Parties have reviewed the documentation provided with the No Liability Arbitration Claims and have determined that the Debtors do not have any liability for such Claims. Furthermore, the Plan Administrator has determined that the No Liability Arbitration Claims would constitute Class 6C Claims under the Plan and that no funds have been allocated from the GUC Litigation Claims Settlement Cash to satisfy such claims. Accordingly, the Plan Administrator requests that the No Liability Arbitration Claims be modified as set forth on **Schedule 1** to the Proposed Order.

14. The No Liability Arbitration Claims listed on **Schedule 1** are the Claims that the Reviewing Parties have identified to date. In a manner consistent with Local Rule 3001-1(e)(iii), for each Claimant, the No Liability Arbitration Claims appear in Rows with the following labels: (1) Name; (2) Claim #; (3) Debtor; (4) Asserted Priority Status; (5) Asserted Amount; (6) Modified Debtor; (7) Modified Priority Status; and (8) Modified Amount (9) Reason. Additionally, each row contains a reason for proposed modification of the claim. Accordingly, the Plan Administrator seeks entry of the Proposed Order modifying or expunging these Claims as set forth on **Schedule 1**.

B. No Liability Tax Claims

15. As a result of their Books and Records review, the Reviewing Parties have identified certain Proofs of Claim that can be characterized as “No Liability Tax Claims” — i.e., Claims that assert a tax liability that is not reflected in the Books and Records. In many instances, these Claims were asserted in estimated amounts for which a return has subsequently been filed. The Reviewing Parties have reviewed each No Liability Tax Claim and all supporting information and documentation provided therewith, made reasonable efforts to research each No Liability Tax Claim and determined that the Debtors are not liable for such No Liability Tax Claims and have therefore objected to such No Liability Tax Claims. Accordingly, and subject to further objection and the express reservation of rights set forth below, the Debtors request that each No Liability Tax Claim be disallowed and expunged.

16. The No Liability Tax Claims listed on **Schedule 2** to the Proposed Order are the No Liability Tax Claims that the Debtors have identified to date. In a manner substantially consistent with Local Rule 3007-1(e)(iii), each No Liability Tax Claim appears in a row with the following labels: (a) Name, (b) Date Filed, (c) Case #, (d) Debtor, (e) Claim #, and (f) Claim Amount. Furthermore, the row below each claim provides additional information as to the reason why each No Liability Tax Claim should be disallowed.

C. No Liability Non-Tax Claims

17. As a result of their Books and Records review, the Reviewing Parties have identified certain Proofs of Claim that can be characterized as “No Liability Non-Tax Claims” — i.e., Claims that assert a liability, other than a tax liability, that is not reflected in the Books and Records. The Reviewing Parties have further determined that the liability on account of each of the No Liability Non-Tax Claims has been satisfied by the Debtors. The Reviewing Parties have

reviewed each No Liability Non-Tax Claim and all supporting information and documentation provided therewith, made reasonable efforts to research each No Liability Non-Tax Claim and determined that the Debtors are not liable for such No Liability Non-Tax Claims and have therefore objected to such No Liability Non-Tax Claims. Accordingly, and subject to further objection and the express reservation of rights set forth below, the Debtors request that each No Liability Non-Tax Claim be disallowed and expunged.

18. The No Liability Non-Tax Claims listed on **Schedule 3** to the Proposed Order are the No Liability Non-Tax Claims that the Debtors have identified to date. In a manner substantially consistent with Local Rule 3007-1(e)(iii), each No Liability Non-Tax Claim appears in a row with the following labels: (a) Name, (b) Date Filed, (c) Case #, (d) Debtor, (e) Claim #, and (f) Claim Amount. Furthermore, the row below each claim provides additional information as to the reason why each No Liability Non-Tax Claim should be disallowed.

SEPARATE CONTESTED MATTERS

19. Each of the above objections to the Disputed Claims constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. The Plan Administrator requests that any order entered by the Court with respect to an objection asserted in this objection shall be deemed a separate order with respect to each Disputed Claim.

RESERVATION OF RIGHTS

20. Nothing contained in this objection or any actions taken by the Debtors or the Plan Administrator pursuant to relief granted in the Proposed Order is intended or should be construed as: (a) an admission as to the validity of any particular Claim (including the Disputed Claims) against the Debtor entities; (b) a waiver of the Debtors' right to dispute any particular Claim (including the Disputed Claims) on any grounds; (c) a promise or requirement to pay any particular

Claim (including the Disputed Claims); (d) an implication or admission that any particular Claim (including the Disputed Claims) is of a type specified or defined in this objection; (e) an admission by the Debtors that any contract or lease is executory or unexpired, as applicable; (f) a waiver or limitation of the Debtors' rights under the Bankruptcy Code or any other applicable law; (g) a request or authorization to assume or reject any agreements under section 365 of the Bankruptcy Code; (h) a waiver of any party's rights to assert that any other party is in breach or default of any agreement; or (i) an admission that any contract or lease is integrated with any other contract or lease.

21. The Debtors and the Plan Administrator hereby reserve their rights to amend, modify, and/or supplement this objection, including to object to the Disputed Claims on any additional grounds, prior to the hearing before the Court on this objection, if any (the "Hearing"), and nothing in this objection shall affect the Debtors' right or the Plan Administrator's right to object to the Disputed Claims at a future date on a basis other than as set forth in this objection as permitted by bankruptcy or nonbankruptcy law, subject to any limitations set forth in the Local Rules.

NOTICE

22. The Plan Administrator has provided notice of this objection to: (a) the Office of the United States Trustee for the District of Delaware; (b) all the claimants on **Schedule 1** though **Schedule 3** to the Proposed Order; and (c) any persons who have filed a request for notice in these chapter 11 cases pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested, the Debtors respectfully submit that no further notice is necessary.

STATEMENT OF COMPLIANCE WITH LOCAL RULE 3007-1(e)(i)(E)

23. The undersigned representative of Klehr Harrison Harvey Branzburg LLP ("***Klehr Harrison***") certifies that he has reviewed the requirements of Local Rule 3007-1 and that the

objection substantially complies with that Local Rule. To the extent that the objection does not comply in all respects with the requirements of Local Rule 3007-1, Klehr Harrison asserts that such deviations are not material and respectfully requests that any such requirement be waived.

WHEREFORE, the Plan Administrator respectfully request that this Court (i) enter the Proposed Order attached hereto as **Exhibit A** modifying and/or disallowing the Disputed Claims, and (ii) grant such other and further relief as is just and proper.

Dated: March 29, 2024
Wilmington, Delaware

/s/ Michael W. Yurkewicz

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

<p>In re:</p> <p>PGX HOLDINGS, INC, <i>et al.</i>,¹</p> <p style="text-align: right;">Debtors.</p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p>Chapter 11</p> <p>Case No. 23-10718 (CTG)</p> <p>(Jointly Administered)</p> <p>Objection Deadline: April 12, 2024 at 4:00 p.m.</p> <p>Hearing Date: May 15, 2024 at 11:00 a.m.</p>
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**NOTICE OF PLAN ADMINISTRATOR’S FIFTH OMNIBUS OBJECTION
(SUBSTANTIVE) TO CERTAIN NO LIABILITY ARBITRATION CLAIMS,
NO LIABILITY TAX CLAIMS, AND NO LIABILITY NON-TAX CLAIMS**

TO THOSE HOLDERS OF CLAIMS ON SCHEDULE 1 THROUGH SCHEDULE 3 TO THE PROPOSED ORDER ANNEXED TO THE OBJECTION AS EXHIBIT A:

- **YOUR SUBSTANTIVE RIGHTS MAY BE AFFECTED BY THE FOLLOWING OBJECTION AND BY ANY FURTHER OBJECTION THAT MAY BE FILED BY THE DEBTORS**
- **YOU ARE DIRECTED TO LOCATE YOUR CLAIM ON THE SCHEDULES TO THE PROPOSED ORDER**
- **THE RELIEF SOUGHT HEREIN IS WITHOUT PREJUDICE TO THE DEBTORS’ RIGHTS, OR THE RIGHTS OF OTHER PARTIES IN INTEREST, TO PURSUE FURTHER SUBSTANTIVE OR NON-SUBSTANTIVE OBJECTIONS AGAINST THE CLAIMS ADDRESSED HEREIN**

PLEASE TAKE NOTICE that on March 29, 2024, the Plan Administrator (the “Plan Administrator”) of the above-captioned debtors (filed with the United States Bankruptcy Court for the District of Delaware (the “Court”), the *Plan Administrator’s Fifth Omnibus Objection to Certain No Liability Arbitration Claims, No Liability Tax Claims, and No Liability Non-Tax Claims* (the “Objection”).

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

PLEASE TAKE FURTHER NOTICE that any response to the Objection must be made in writing and be filed with the Court, on or before **April 12, 2024 at 4:00 p.m. prevailing Eastern Time**.

PLEASE TAKE FURTHER NOTICE that at the same time, you must also serve a copy of the response to this Objection upon: (a) counsel for the Plan Administrator, (i) Kirkland & Ellis LLP, 300 North LaSalle, Chicago, Illinois 60654 (Attn: Spencer Winters (spencer.winters@kirkland.com) and Alison J. Wirtz (alison.wirtz@kirkland.com)) and (ii) Klehr Harrison Harvey Branzburg LLP, 919 N. Market Street, Suite 1000, Wilmington, Delaware 19801 (Attn: Domenic E. Pacitti (dpacitti@klehr.com) and Michael W. Yurkewicz (myurkewicz@klehr.com)); (b) counsel for the Prepetition First Lien Lenders and DIP Lenders, (i) King & Spalding, 1185 Avenue of the Americas, New York, New York 10036 (Attn: Roger Schwartz, Esq. (rschwartz@kslaw.com); Geoffrey Michael King, Esq. (gking&kslaw.com) and Timothy Fesenmyer, Esq. (tfesenmyer@kslaw.com); and (ii) Morris, Nichols, Arsht & Tunnell LLP, 1201 N. Market Street, Suite 1600, Wilmington, Delaware 19801, (Attn: Robert J. Dehney (rdehney@morrisnichols.com)).

PLEASE TAKE FURTHER NOTICE that if you fail to respond in accordance with this notice, the Court may sustain the Objection without further notice or hearing.

PLEASE TAKE FURTHER NOTICE THAT IF AN OBJECTION IS PROPERLY FILED AND SERVED ON THE NOTICE PARTIES IN ACCORDANCE WITH THE ABOVE PROCEDURES, A HEARING WILL BE HELD BEFORE THE HONORABLE CRAIG T. GOLDBLATT, UNITED STATES BANKRUPTCY JUDGE FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 3RD FLOOR, COURTROOM #7, WILMINGTON, DELAWARE 19801 ON MAY 15, 2024 AT 11:00 A.M. PREVAILING EASTERN TIME. ONLY OBJECTIONS MADE IN WRITING AND TIMELY FILED WILL BE CONSIDERED BY THE BANKRUPTCY COURT AT SUCH HEARING.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: March 29, 2024
Wilmington, Delaware

/s/ Michael W. Yurkewicz

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Co-Counsel to the Plan Administrator

Co-Counsel to the Plan Administrator

Exhibit A

Proposed Order

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

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

**ORDER SUSTAINING PLAN ADMINISTRATOR’S FIFTH OMNIBUS
OBJECTION (SUBSTANTIVE) TO CERTAIN NO LIABILITY ARBITRATION
CLAIMS, NO LIABILITY TAX CLAIMS, AND NO LIABILITY NON-TAX CLAIMS**

Upon the objection (the “Objection”)² of the Plan Administrator seeking entry of an order modifying or expunging certain Disputed Claims ; and it appearing that the Court has jurisdiction over this matter pursuant to 28 U.S.C. §1334; and it appearing that this is a core proceeding pursuant to 28 U.S.C. §157; and it appearing that venue of this proceeding is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409; and the Plan Administrator, on behalf of the Debtors, having consented to the Court’s entry of a final order consistent with Article III of the United States Constitution; and adequate notice of the Objection and opportunity for response having been given; and it appearing that no other notice need be given; and the Court having considered the Objection, the Disputed Claims listed on **Schedule 1** through **Schedule 3** annexed hereto, and any

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

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

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

- A. This Objection is a core proceeding under 28 U.S.C. § 157(b)(2).
- B. Each holder of a Claim listed on Schedule 1 through Schedule 3 attached hereto was properly and timely served with a copy of the Objection, this order (this “Order”), the accompanying exhibits, and the notice.
- C. Any entity known to have an interest in the Disputed Claims subject to the Objection has been afforded reasonable opportunity to respond to, or be heard regarding, the relief requested in the Objection.
- D. Each of the Claims on Schedule 1 are Class 6C Claims under the Plan that assert a Claim for which the Debtors are not liable.
- E. Each of the Claims on Schedule 2 assert a Claim for which the Debtors are not liable.
- F. Each of the Claims on Schedule 3 hereto asserts a Claim for which the Debtors have no liability.

IT IS HEREBY ORDERED ADJUDGED AND DECREED that:

- 1. The Objection is sustained as set forth herein.
- 2. Any response to the Objection not otherwise withdrawn, resolved, or adjourned is hereby overruled on its merits.
- 3. Each of the No Liability Arbitration Claims listed as an objectionable Claim on Schedule 1 hereto is disallowed.
- 4. Each of the No Liability Tax Claims listed as an objectionable Claim on Schedule 2 hereto is disallowed.

5. Each of the No Liability Non-Tax Claims listed as an objectionable Claim on **Schedule 3** hereto is disallowed.

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

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

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

9. Each Disputed Claim, and the objections by the Debtors to such Disputed Claim, as addressed in the Objection and set forth on **Schedule 1** through **Schedule 3** hereto, constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014 and Local Rule 3007-1. This Order shall be deemed a separate Order with respect to each Disputed Claim. Any stay of

this Order pending appeal by any claimants whose Claims are subject to this Order shall only apply to the contested matter that involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

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

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

Schedule 1

No Liability Arbitration Claims

PGX Holdings, Inc. Case No. 23-10718
 Fifth Omnibus Objection (Substantive)
 Schedule 1 - Unliquidated Arbitration Claims

ASSERTED

MODIFIED

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
1	MONICA ALEXANDER ATLAS CONSUMER LAW C/O MOHAMMED BADWAN, ESQ. 2500 S. HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	43	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
2	NATALIE R PORTILLO C/O NATHAN VOLHEIM 2500 S HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	504	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
3	NATHANIEL WHITELOW C/O OMAR SULAIMAN 2500 S HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	501	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
4	NICOLE BORDEN C/O OMAR SULAIMAN 2500 S HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	499	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								

*Indicates claim contains unliquidated and/or undetermined amounts

PGX Holdings, Inc. Case No. 23-10718
 Fifth Omnibus Objection (Substantive)
 Schedule 1 - Unliquidated Arbitration Claims

ASSERTEDMODIFIED

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
5	NICOLE M COZART C/O NATHAN VOLHEIM 2500 S HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	496	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
6	NIKKI SYKES C/O OMAR SULAIMAN 2500 S HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	493	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
7	NORITA M. MORELAND C/O NATHAN VOLHEIM 2500 S HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	491	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
8	OSCAR SMITH C/O NATHAN VOLHEIM 2500 S HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	488	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								

*Indicates claim contains unliquidated and/or undetermined amounts

PGX Holdings, Inc. Case No. 23-10718
 Fifth Omnibus Objection (Substantive)
 Schedule 1 - Unliquidated Arbitration Claims

ASSERTEDMODIFIED

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
9	PHILIP JACOBY C/O NATHAN VOLHEIM 2500 S HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	485	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
10	PHILIPPA MARKO C/O OMAR SULAIMAN 2500 S HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	482	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
11	PRINCE JENKINS C/O NATHAN VOLHEIM 2500 S HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	479	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
12	QUINCI SMITH SLATER C/O OMAR SULAIMAN 2500 S HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	473	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								

*Indicates claim contains unliquidated and/or undetermined amounts

PGX Holdings, Inc. Case No. 23-10718
Fifth Omnibus Objection (Substantive)
Schedule 1 - Unliquidated Arbitration Claims

ASSERTEDMODIFIED

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
13	RANDALL KUKICH C/O OMAR SULAIMAN 2500 S HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	467	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
14	RICKY C MCGRUDER C/O NATHAN VOLHEIM 2500 S HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	461	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
15	RICKY C MCGRUDER C/O NATHAN VOLHEIM 2500 S HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	465	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
16	RICO PAPPILLION C/O OMAR SULAIMAN 2500 S HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	460	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								

*Indicates claim contains unliquidated and/or undetermined amounts

PGX Holdings, Inc. Case No. 23-10718
Fifth Omnibus Objection (Substantive)
Schedule 1 - Unliquidated Arbitration Claims

ASSERTEDMODIFIED

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
17	ROSS J THRASHER C/O NATHAN VOLHEIM 2500 S HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	455	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
18	SEAN M FITZGERALD C/O NATHAN VOLHEIM 2500 S HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	438	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
19	SERENA BENJAMIN C/O OMAR SULAIMAN 2500 S MICHIGAN AVENUE, SUITE 200 LOMBARD, IL 60148	442	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
20	SHANDA M SMITH C/O NATHAN VOLHEIM 2500 S HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	396	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								

*Indicates claim contains unliquidated and/or undetermined amounts

PGX Holdings, Inc. Case No. 23-10718
Fifth Omnibus Objection (Substantive)
Schedule 1 - Unliquidated Arbitration Claims

ASSERTEDMODIFIED

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
21	SHANNON MAYBEE C/O OMAR SULAIMAN 2500 S HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	390	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
22	SHANTELL R PINKERTON C/O NATHAN VOLHEIM 2500 S HIGHLAND AVE, SUITE 200 LOMBARD, IL 6148	391	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
23	SHANTELE KENNEDY C/O NATHAN VOLHEIM 2500 S HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	389	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
24	SHERYCE XBAUGH C/O OMAR SULAIMAN 2500 S HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	385	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								

*Indicates claim contains unliquidated and/or undetermined amounts

PGX Holdings, Inc. Case No. 23-10718
 Fifth Omnibus Objection (Substantive)
 Schedule 1 - Unliquidated Arbitration Claims

ASSERTED

MODIFIED

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
25	SONJA SMITH WILLIAMS C/O OMAR SULAIMAN 2500 S HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	382	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
26	STELLA Y HARGROVE C/O NATHAN VOLHEIM 2500 S HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	380	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
27	STEPHANIE M ARNOLD C/O NATHAN VOLHEIM 2500 S HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	445	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
28	STEPHANIE T HOPSON C/O NATHAN VOLHEIM 2500 S HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	450	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								

*Indicates claim contains unliquidated and/or undetermined amounts

PGX Holdings, Inc. Case No. 23-10718
 Fifth Omnibus Objection (Substantive)
 Schedule 1 - Unliquidated Arbitration Claims

ASSERTED

MODIFIED

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
29	STEPHEN CARPENTER C/O NATHAN VOLHEIM 2500 S HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	364	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
30	SWANICA BLACK C/O NATHAN VOLHEIM 2500 S HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	423	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
31	TAMIKO HARRIS MORRISON C/O NATHAN VOLHEIM 2500 S HIGHLAND AVE, SUITE 200 LOMBARD, IL 60148	358	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
32	THERESA KEMP C/O OMAR SULAIMAN 2500 S HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	357	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								

*Indicates claim contains unliquidated and/or undetermined amounts

PGX Holdings, Inc. Case No. 23-10718
 Fifth Omnibus Objection (Substantive)
 Schedule 1 - Unliquidated Arbitration Claims

ASSERTED

MODIFIED

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
33	THOMAS RODRIGUEZ C/O NATHAN VOLHEIM 2500 S HIGHLAND AVE, SUITE 200 LOMBARD, IL 60148	354	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
34	TIFFANY SHEFFIELD C/O OMAR SULAIMAN 2500 S HIGHLAND AVE, SUITE 200 LOMBARD, IL 60148	421	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
35	TIM WRIGHT C/O OMAR SULAIMAN 2500 S HIGHLAND AVE, SUITE 200 LOMBARD, IL 60148	361	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
36	TOMORIA DUGGERANJUM C/O OMAR SULAIMAN 2500 S HIGHLAND AVE, SUITE 200 LOMBARD, IL 60148	416	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								

*Indicates claim contains unliquidated and/or undetermined amounts

PGX Holdings, Inc. Case No. 23-10718
Fifth Omnibus Objection (Substantive)
Schedule 1 - Unliquidated Arbitration Claims

ASSERTEDMODIFIED

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
37	TONYA WILSON C/O NATHAN VOLHEIM 2500 S HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	415	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
38	TRESA HOPKINS C/O OMAR SULAIMAN 2500 S HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	411	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
39	UTOPIA PLOWDEN C/O NATHAN VOLHEIM 2500 S HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	360	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
40	VAQUANA PRIVOTT C/O OMAR SULAIMAN 2500 S HIGHLAND AVENUE, SUITE 200 LOMBARD, IL 60148	408	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								

*Indicates claim contains unliquidated and/or undetermined amounts

PGX Holdings, Inc. Case No. 23-10718
 Fifth Omnibus Objection (Substantive)
 Schedule 1 - Unliquidated Arbitration Claims

ASSERTEDMODIFIED

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
41	VICTOR PEREZ C/O MARWAN DAHER 2500 S HIGHLAND AVE, SUITE 200 LOMBARD, IL 60148	366	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
42	WENDY BRUCE C/O OMAR SULAIMAN 2500 S HIGHLAND AVE, SUITE 200 LOMBARD, IL 60148	404	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
43	WILLIAM R POWERS C/O NATHAN VOLHEIM 2500 S HIGHLAND AVE, SUITE 200 LOMBARD, IL 60148	400	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
44	WILLIAM TAYLOR C/O NATHAN VOLHEIM 2500 S HIGHLAND AVE, SUITE 200 LOMBARD, IL 60148	402	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								

*Indicates claim contains unliquidated and/or undetermined amounts

PGX Holdings, Inc. Case No. 23-10718
 Fifth Omnibus Objection (Substantive)
 Schedule 1 - Unliquidated Arbitration Claims

ASSERTEDMODIFIED

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
45	YOLANDA WALKER-RUSHING C/O NATHAN VOLHEIM 2500 S HIGHLAND AVE, SUITE 200 LOMBARD, IL 60148	395	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								
46	ZHICHENG ZHEN ATLAS CONSUMER LAW C/O NATHAN VOLHEIM 2500 S HIGHLAND AVE, SUITE 200 LOMBARD, IL 60148	392	John C. Heath Attorney at Law PC	Unsecured	Undetermined*	John C. Heath Attorney at Law PC	Unsecured	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim the documents attached thereto , and a reasonable review of the Debtors' books and records. The Claim further asserts a liability that is not entitled to a distribution under the Plan.								

*Indicates claim contains unliquidated and/or undetermined amounts

Schedule 2

No Liability Tax Claims

PGX Holdings, Inc. Case No. 23-10718
 Fifth Omnibus Objection (Substantive)
 Schedule 2 - No Liability (Tax Claims)

NAME	DATE FILED	CASE #	DEBTOR	CLAIM #	CLAIM AMOUNT
1 ARIZONA DEPARTMENT OF REVENUE C/O TAX, BANKRUPTCY AND COLLECTION SCT OFFICE OF THE ARIZONA ATTORNEY GENERAL - BCE 2005 N CENTRAL AVE, SUITE 100 PHOENIX, AZ 85004	06/22/2023	23-10730	Progrexion Teleservices, Inc.	26	\$18,000.00

Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim, the documents attached thereto, and a reasonable review of the Debtors' books and records. Claimant filed an estimated claim for withholding for the March 31, 2014 period, totaling \$18,000. The Debtor began filing returns in July of 2013 and has paid all amounts due to date. There was no payroll paid prior to July 2013.

2 ARIZONA DEPARTMENT OF REVENUE C/O TAX, BANKRUPTCY AND COLLECTION SCT OFFICE OF THE ARIZONA ATTORNEY GENERAL - BCE 2005 N CENTRAL AVE, SUITE 100 PHOENIX, AZ 85004	06/22/2023	23-10725	John C. Heath Attorney at Law PC	30	\$15,450.00
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Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim, the documents attached thereto, and a reasonable review of the Debtors' books and records. Debtor filed and paid Transaction Privilege taxes on a quarterly cadence. Claimant has asserted an estimated claim with assessments for the month between the quarterly filings. The Debtor maintains that all Transaction Privilege taxes were reported and paid quarterly. Claimant also asserts a claims for estimated 2022 Corporate income taxes totaling \$15,450. Debtor filed its 2022 Corporate Taxes on October 16, 2023. The minimum tax of \$50.00 was assessed and paid.

3 ARIZONA DEPARTMENT OF REVENUE C/O TAX, BANKRUPTCY AND COLLECTION SCT OFFICE OF THE ARIZONA ATTORNEY GENERAL 2005 N CENTRAL AVE, SUITE 100 PHOENIX, AZ 85004	07/31/2023	23-10722	Creditrepair.com, Inc.	52	\$3,493.37
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Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim, the documents attached thereto, and a reasonable review of the Debtors' books and records. Debtor filed and paid Transaction Privilege Taxes on a quarterly cadence. Claimant has asserted an estimated claim with assessments for the months between the quarterly filings. The Debtor maintains that all Transaction Privilege Taxes were reported and paid quarterly. Claimant also asserted a claim for withholding taxes and penalties for March and June of 2015 for \$168.37 and for Transaction Privilege Tax penalty of \$25.00 totaling \$193.37. Debtor paid \$193.37 on December 12, 2023 by ECheck (Confirmation # 1000050625805 & Payment Locator # 23Z3459513324).

PGX Holdings, Inc. Case No. 23-10718
 Fifth Omnibus Objection (Substantive)
 Schedule 2 - No Liability (Tax Claims)

NAME	DATE FILED	CASE #	DEBTOR	CLAIM #	CLAIM AMOUNT
4 ARIZONA DEPARTMENT OF REVENUE C/O TAX, BANKRUPTCY AND COLLECTION SCT OFFICE OF THE ARIZONA ATTORNEY GENERAL 2005 N CENTRAL AVE, SUITE 100 PHOENIX, AZ 85004	07/31/2023	23-10726	Progrexion ASG, Inc.	53	\$23,725.00

Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim, the documents attached thereto, and a reasonable review of the Debtors' books and records. Debtor filed and paid Transaction Privilege taxes on a quarterly cadence. Claimant has asserted an estimated claim with assessments for the month between the quarterly filings. The Debtor maintains that all Transaction Privilege taxes were reported and paid quarterly. Claimant also filed a claim for estimated withholdings taxes for the March 31, 2015 period. Debtor maintains that no withholding taxes are owed for this period.

5 ARIZONA DEPARTMENT OF REVENUE OFFICE OF THE ARIZONA ATTORNEY GENERAL 2005 N CENTRAL AVE, SUITE 100 PHOENIX, AZ 85004	10/19/2023	23-10722	Creditrepair.com, Inc.	583	\$200.00
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Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim, the documents attached thereto, and a reasonable review of the Debtors' books and records. Debtor filed and paid Transaction Privilege taxes on a quarterly cadence. Claimant has asserted an estimated claim with assessments for the month between the quarterly filings. The Debtor maintains that all Transaction Privilege taxes were reported and paid quarterly.

6 ARIZONA DEPARTMENT OF REVENUE OFFICE OF THE ARIZONA ATTORNEY GENERAL 2005 N CENTRAL AVE, SUITE 100 PHOENIX, AZ 85004	10/20/2023	23-10725	John C. Heath Attorney at Law PC	595	\$768.35
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Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim, the documents attached thereto, and a reasonable review of the Debtors' books and records. Debtor filed and paid Transaction Privilege taxes on a quarterly cadence. Claimant has asserted an estimated claim with assessments for the month between the quarterly filings. The Debtor maintains that all Transaction Privilege taxes were reported and paid quarterly. Moreover, the Debtor paid \$68.35 to claimant on December 11, 2023, by Echeck (Confirmation #1000050623893).

PGX Holdings, Inc. Case No. 23-10718
 Fifth Omnibus Objection (Substantive)
 Schedule 2 - No Liability (Tax Claims)

NAME	DATE FILED	CASE #	DEBTOR	CLAIM #	CLAIM AMOUNT
7 ARIZONA DEPARTMENT OF REVENUE OFFICE OF THE ARIZONA ATTORNEY GENERAL 2005 N CENTRAL AVE, SUITE 100 PHOENIX, AZ 85004	10/20/2023	23-10726	Progrexion ASG, Inc.	596	\$600.00

Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim, the documents attached thereto, and a reasonable review of the Debtors' books and records. Debtor filed and paid Transaction Privilege taxes on a quarterly cadence. Claimant has asserted an estimated claim with assessments for the month between the quarterly filings. The Debtor maintains that all Transaction Privilege taxes were reported and paid quarterly.

8 ARIZONA DEPARTMENT OF REVENUE OFFICE OF THE ARIZONA ATTORNEY GENERAL - BCE 2005 N CENTRAL AVE, SUITE 100 PHOENIX, AZ 85004	12/28/2023	23-10725	John C. Heath Attorney at Law PC	619	\$1,050.00
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Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim, the documents attached thereto, and a reasonable review of the Debtors' books and records. Debtor filed and paid Transaction Privilege Taxes on a quarterly cadence. Claimant has asserted an estimated claim with assessments for the months between the quarterly filings. The Debtor maintains that all Transaction Privilege Taxes were reported and paid quarterly. Moreover, the Debtor paid \$68.35 to claimant on December 11, 2023, by Echeck (Confirmation #1000050623893).

9 ARIZONA DEPARTMENT OF REVENUE OFFICE OF THE ARIZONA ATTORNEY GENERAL - BCE 2005 N CENTRAL AVE, SUITE 100 PHOENIX, AZ 85004	12/28/2023	23-10726	Progrexion ASG, Inc.	621	\$900.00
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Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim, the documents attached thereto, and a reasonable review of the Debtors' books and records. Debtor filed and paid Transaction Privilege taxes on a quarterly cadence. Claimant has asserted an estimated claim with assessments for the month between the quarterly filings. The Debtor maintains that all Transaction Privilege taxes were reported and paid quarterly.

PGX Holdings, Inc. Case No. 23-10718
Fifth Omnibus Objection (Substantive)
Schedule 2 - No Liability (Tax Claims)

NAME	DATE FILED	CASE #	DEBTOR	CLAIM #	CLAIM AMOUNT
10 ARIZONA DEPARTMENT OF REVENUE OFFICE OF THE ARIZONA ATTORNEY GENERAL - BCE 2005 N CENTRAL AVE, SUITE 100 PHOENIX, AZ 85004	12/28/2023	23-10722	Creditrepair.com, Inc.	622	\$300.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim, the documents attached thereto, and a reasonable review of the Debtors' books and records. Debtor filed and paid Transaction Privilege taxes on a quarterly cadence. Claimant has asserted an estimated claim with assessments for the month between the quarterly filings. The Debtor maintains that all Transaction Privilege taxes were reported and paid quarterly.					
11 ARIZONA DEPARTMENT OF REVENUE OFFICE OF THE ARIZONA ATTORNEY GENERAL 2005 N CENTRAL AVE, SUITE 100 PHOENIX, AZ 85004	02/05/2024	23-10726	Progrexion ASG, Inc.	667	\$1,200.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim, the documents attached thereto, and a reasonable review of the Debtors' books and records. Debtor filed and paid Transaction Privilege taxes on a quarterly cadence. Claimant has asserted an estimated claim with assessments for the month between the quarterly filings. The Debtor maintains that all Transaction Privilege taxes were reported and paid quarterly.					
12 COLORADO DEPARTMENT OF REVENUE BANKRUPTCY UNIT, RM 104 1881 PIERCE ST LAKEWOOD, CO 80214	10/24/2023	23-10718	PGX Holdings, Inc.	597	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim, the documents attached thereto, and a reasonable review of the Debtors' books and records. Debtor filed its tax return on October 12, 2023 resulting in a refund to the Debtor of \$2,261.00 plus interest \$141.00 for a total refund of \$2,402.					
13 COLORADO DEPARTMENT OF REVENUE 1881 PIERCE STREET BANKRUPTCY UNIT, RM 104 LAKEWOOD, CO 80214	10/24/2023	23-10725	John C. Heath Attorney at Law PC	598	\$0.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim, the documents attached thereto, and a reasonable review of the Debtors' books and records. Debtor filed its 2022 corporate tax return which showed that no amounts were owed.					

PGX Holdings, Inc. Case No. 23-10718
Fifth Omnibus Objection (Substantive)
Schedule 2 - No Liability (Tax Claims)

NAME	DATE FILED	CASE #	DEBTOR	CLAIM #	CLAIM AMOUNT
14 MARICOPA COUNTY TREASURER BANKRUPTCY DEPARTMENT 301 WEST JEFFERSON STREET SUITE 100 PHOENIX, AZ 85003	06/09/2023	23-10725	John C. Heath Attorney at Law PC	2	\$8,298.26
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim, the documents attached thereto, and a reasonable review of the Debtors' books and records. Per the 2023 Personal Property Valuation Notice from Maricopa County dated August 18 2023 , the assessed value of the property was \$0.00 and as a result the entire value of the property is below the exemption amount and the Debtor do not owe any personal property tax at this time .					
15 MARICOPA COUNTY TREASURER BANKRUPTCY DEPARTMENT 301 WEST JEFFERSON STREET SUITE 100 PHOENIX, AZ 85003	06/09/2023	23-10726	Progrexion ASG, Inc.	3	\$5,514.92
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim, the documents attached thereto, and a reasonable review of the Debtors' books and records. Claimant asserts a claim for 2023 estimated personal property taxes totaling \$5,514.92. Based on the 2023 Personal Property Valuation Notice from Maricopa County dated August 18, 2023, Progrexion ASG, Inc. owed \$3,523.70 in personal property taxes, which Progrexion ASG, Inc. paid in full on October 18, 2023, with ECheck *8312 (Reference Number TRS1649192).					
16 NEW YORK STATE DEPARTMENT OF TAXATION AND FINANCE BANKRUPTCY SECTION PO BOX 5300 ALBANY, NY 12205-0300	06/21/2023	23-10729	Progrexion Marketing, Inc.	24	\$101.40
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim, the documents attached thereto, and a reasonable review of the Debtors' books and records. Progrexion Teleservices, Inc. employee Matthew Drummond lives and works in New York, and was paid on a regular basis. The wages of Mr. Drummond were accidentally reported to New York State under the Progrexion Marketing Inc.'s business name. Once the Debtor became aware of the error, the check was canceled and reissued to Mr. Drummond under the Progrexion Teleservices, Inc.'s name. Progrexion Marketing has no employees in New York. All taxes owed by Progrexion Teleservices, Inc. were properly withheld and paid to New York and no additional amounts are owed at this time. Progrexion Marketing Inc. did not have employees in New York for 2022 and does not owe any withholding taxes at this time.					

PGX Holdings, Inc. Case No. 23-10718
Fifth Omnibus Objection (Substantive)
Schedule 2 - No Liability (Tax Claims)

NAME	DATE FILED	CASE #	DEBTOR	CLAIM #	CLAIM AMOUNT
17 NM TAXATION & REVENUE DEPARTMENT PO BOX 8575 ALBUQUERQUE, NM 87198-8575	08/30/2023	23-10730	Progrexion Teleservices, Inc.	242	\$1,391.31
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim, the documents attached thereto, and a reasonable review of the Debtors' books and records. Claimant asserts a claim for certain withholding taxes and work compensation taxes for 2022. In relation to the worker compensation taxes, the Debtor believe that no amounts are currently due which is also reflected on the State of New Mexico's Tax Payer Access Point website. Claimant also asserts a claim for withholding taxes for April and May of 2023. Debtors closed their teleservice operations prior to April of 2023 and no withholding taxes are owed.					
18 NM TAXATION & REVENUE DEPARTMENT PO BOX 8575 ALBUQUERQUE, NM 87198-8575	08/30/2023	23-10725	John C. Heath Attorney at Law PC	246	\$52.45
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim, the documents attached thereto, and a reasonable review of the Debtors' books and records. Debtors filed its 2022 corporate income tax return on October 16, 2023, which showed a liability of \$50, which was paid at the time of filing. No additional amounts are owed to claimant for 2022 corporate income tax.					
19 OKLAHOMA COUNTY TREASURER 320 ROBERT S KERR RM 307 OKLAHOMA CITY, OK 73102	06/14/2023	23-10718	PGX Holdings, Inc.	14	\$3,968.25
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim, the documents attached thereto, and a reasonable review of the Debtors' books and records. Debtors filed its Form 901 for 2023 business personal property taxes under Progrexion ASG, Inc., which showed a total liability of \$2,334.97, which was paid on December 20, 2023 (Approval ID 31083498).					
20 STATE OF NEW JERSEY DIVISION OF TAXATION BANKRUPTCY SECTION PO BOX 245 TRENTON, NJ 08695-0245	09/06/2023	23-10718	PGX Holdings, Inc.	277	\$43,809.00
Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim, the documents attached thereto, and a reasonable review of the Debtors' books and records. Debtors made estimated corporate business tax payments totaling \$43,809 and subsequently filed its 2022 corporate business tax return showing a liability of \$37,746. As a result Debtors are owed a refund of \$6,041. Debtors do not owe any additional amounts to claimant for 2022 corporate business taxes.					

PGX Holdings, Inc. Case No. 23-10718
 Fifth Omnibus Objection (Substantive)
 Schedule 2 - No Liability (Tax Claims)

NAME	DATE FILED	CASE #	DEBTOR	CLAIM #	CLAIM AMOUNT
21 STATE OF NEW JERSEY DIVISION OF TAXATION BANKRUPTCY SECTION PO BOX 245 TRENTON, NJ 08695-0245	09/06/2023	23-10725	John C. Heath Attorney at Law PC	279	\$2,000.00
				TOTAL	\$130,822.31

Reason: The Debtors are not liable for the claim per a review of the claimant's proof of claim, the documents attached thereto, and a reasonable review of the Debtors' books and records. Debtors made estimated corporate business tax payments totaling \$2,000 and subsequently filed its 2022 corporate business tax return showing a liability of \$2,000. Debtors do not owe any additional amounts to claimant for 2022 corporate business taxes.

Schedule 3

No Liability Non-Tax Claims

PGX Holdings, Inc. Case No. 23-10718
 Fifth Omnibus Objection (Substantive)
 Schedule 3 - No Liability Non-Tax Claims

NAME	DATE FILED	CASE #	DEBTOR	CLAIM #	CLAIM AMOUNT
1 AIRESFRING INC LEGAL DEPARTMENT 600 CLEVELAND STREET, SUITE 226 CLEARWATER, FL 33755	06/29/2023	23-10726	Progrexion ASG, Inc.	35	\$34,594.93
Reason: Claim was satisfied by payments of \$17,487.46 and \$17,752.37 paid on 11/3/2023. Associated voucher numbers are 000070008 & 000070482, respectively.					
2 ARGANO, LLC ELIZABETH FREDERIC 6100 W PLANO PARKWAY SUITE 1800 PLANO, TX 75093	08/29/2023	23-10726	Progrexion ASG, Inc.	238	\$912,639.00
Reason: Claim was satisfied in full via payments of \$278,324, \$328,655 & \$305,660 paid on 10/31/2023. The voucher numbers associated with the payments are 000070076, 000070389 & 000070550, respectively.					
3 CDW DIRECT, LLC ATTN VIDA KRUG CDW 200 N. MILWAUKEE AVE VERNON HILLS, IL 60061	06/09/2023	23-10726	Progrexion ASG, Inc.	16	\$3,417.06
Reason: Claim was satisfied in full via payment on 10/31/2023. Associated voucher number is 000069805.					
4 CINTAS CORPORATION ANN DEAN, LITIGATION PARALEGAL 6800 CINTAS BOULEVARD MASON, OH 45040	09/18/2023	23-10727	Progrexion Holdings, Inc.	523	\$423.40
Reason: Claim was satisfied in full via payments of \$100.77 & \$161.63 on 11/3/2023 and \$161.63 on 7/5/2023. Associated voucher numbers for these payments are 000069855, 000070498 & 000070694, respectively.					

PGX Holdings, Inc. Case No. 23-10718
Fifth Omnibus Objection (Substantive)
Schedule 3 - No Liability Non-Tax Claims

NAME	DATE FILED	CASE #	DEBTOR	CLAIM #	CLAIM AMOUNT
5 HAWTHORNE DIRECT, LLC STEVEN JURGENSEN 101 NORTH COURT STREET FAIRFIELD, IA 52556	09/01/2023	23-10729	Progrexion Marketing, Inc.	255	\$949,797.07
Reason: Claim was satisfied in full. Invoice 005077 was paid on 10/31/2023 via voucher number 187073. Invoice #s 005102, 005184R & 005336 were paid on 11/3/2023 via voucher numbers 187705, 187209 & 187264.					
6 HONESTLY CLEAN, LLC 4573 E MAJESTIC VIEW DR AMMON, ID 83406	08/21/2023	23-10726	Progrexion ASG, Inc.	179	\$11,677.11
Reason: Claim was satisfied in full via payments of \$4,227.11, \$3,960 & \$3,490 paid on 10/31/2023 via voucher numbers 000069941, 000069942 & 000070045, respectively.					
7 ROKT CORP. 175 VARICK ST LEVEL 10 NEW YORK, NY 10014	08/15/2023	23-10727	Progrexion Holdings, Inc.	86	\$2,711.05
Reason: This claim was satisfied in full via payment of \$2,711.05 on 8/17/2023 via voucher number CVH187498.					
8 THE 41ST PARAMETER, INC. JOSEPH D. FRANK FRANKGECKER LLP 1327 WEST WASHINGTON BLVD STE 5 G-H CHICAGO, IL 60607	09/07/2023	23-10726	Progrexion ASG, Inc.	448	\$44,446.88
Reason: This claim was satisfied in full via voucher number 000071086 paid on 9/26/2023.					
				TOTAL	\$1,959,706.50

EXHIBIT B

Niemerg Declaration

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

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

**DECLARATION OF RICHARD NIEMERG IN SUPPORT
OF THE PLAN ADMINISTRATOR’S FIFTH OMNIBUS OBJECTION
(SUBSTANTIVE) TO CERTAIN NO LIABILITY ARBITRATION CLAIMS,
NO LIABILITY TAX CLAIMS, AND NO LIABILITY NON-TAX CLAIMS**

I, Richard Niemerg, hereby declare under penalty of perjury:

1. I submit this declaration (this “Declaration”) in support of the *Plan Administrator’s Fifth Omnibus Objection (Substantive) to Certain No Liability Arbitration Claims, No Liability Tax Claims, and No Liability Non-Tax Claims* (the “Objection”) filed by the Plan Administrator (the “Plan Administrator”) of the above captioned debtors (the “Debtors”).

2. I am a Managing Director at Alvarez & Marsal North America, LLC (“A&M”), which was employed by the Debtors pursuant to the *Order Authorizing Debtors to Employ and Retain Alvarez & Marsal North America, LLC as Financial Advisor to the Debtors and Debtors in Possession, Effective as of the Petition Date, Pursuant to Sections*

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

327(a) and 328 [Docket No. 214] (the “Retention Order”). A&M has been subsequently retained by the Plan Administrator

3. I am familiar with the Debtors’ day-to-day operations, businesses, financial affairs, and books and records. I make this declaration on the basis of the review by myself and those under my direction of the Debtors’ respective books and records (the “Books and Records”), the register of claims (the “Claims Register”) prepared and provided by the Debtors’ notice and claims agent, Kurtzman Carson Consulting LLC (“KCC”), and the Proofs of Claim filed in these chapter 11 cases.

4. All matters set forth in this Declaration are based on: (a) my personal knowledge; (b) my review of relevant documents; (c) my view, based on my experience and knowledge of the Debtors’ operations and Books and Records; (d) information supplied to me by others at my request including my team at A&M, or former or current employees of the Debtors or the Purchaser; and (e) as to matters involving United States bankruptcy law or rules or other applicable laws, my reliance on the advice of counsel or other advisors to the Debtors and the Plan Administrator. If called upon to testify, I could and would testify competently to the facts set forth herein.

5. On June 4, 2023 (the “Petition Date”), the Debtors filed with the Court voluntary petitions for relief under the Bankruptcy Code. During the pendency of their chapter 11 cases, the Debtors operated their business and managed their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

6. On July 19, 2023, the Court entered an Order (A) Establishing Bar Dates for Filing Proofs of Claim, Including Claims Under 11 U.S.C. § 503(B)(9) and Administrative Expense Requests; (B) Approving the Form and Manner for Filing Proofs

of Claim and Administrative Expense Requests; (C) Approving Notice Thereof; and (D) Granting Related Relief [Docket No. 194] (the “Bar Date Order”), establishing, among other things, September 7, 2023 as the deadline for all non-governmental entities to file Proofs of Claim.

7. On December 26, 2023, the Court entered the Findings of Fact, Conclusions of Law, and Order Approving the Debtors’ Disclosure Statement for, and Confirming the Second Amended Joint Chapter 11 Plan of PGX Holdings, Inc., and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 681] (the “Confirmation Order”) that confirmed the Second Amended Joint Plan of PGX Holdings, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 570] (the “Plan”). On December 26, 2023, the Effective Date of the Plan occurred. The Plan designated Mark A. Roberts of Alvarez & Marsal North America, LLC as the Plan Administrator. Under the Plan, the Plan Administrator is authorized to administer claims on the Debtors’ behalf.

8. On August 25, 2023, the Court entered orders [Docket No. 422 and 423] (together, the “Sale Orders”) approving (i) the Debtors’ entry into and performance under each of the Stalking Horse Agreements and authorizing the sale of substantially all of the Debtors’ assets free and clear of all liens, claims, interest, and encumbrances and (ii) the assumption by the Debtors and the assignment and sale to the Progexion Purchaser or Lexington Law Purchaser (as applicable, the “Purchaser”) of executory contracts and unexpired leases to be designated by the Purchaser as “Assumed Contracts” pursuant to the Sale Orders, the Progexion APA, the Lexington Law APA, and sections 363 and 365 of the Bankruptcy Code, subject to, and effective as of, the closing of the Sale Transactions

(the date of the closing being the “Closing Date”). The Closing Date occurred on September 28, 2023.

9. During the Claims reconciliation process, I have conducted, and continue to conduct, a review of the Proofs of Claim filed in these chapter 11 cases. In this regard, I, or another person at my direction, participated in the review of both the Claims Register and the Books and Records with respect to identifying Claims that should be disallowed and expunged (the “Disputed Claims”) as described in the Objection. I have read the Objection, the proposed order (the “Proposed Order”), and **Schedule 1** through **Schedule 3** attached to the Proposed Order, and I am familiar with the information contained therein.

10. No Liability Arbitration Claims. Upon the review of the Proofs of Claim filed in these cases, I, or someone at my direction, have identified the No Liability Arbitration Claims listed on **Schedule 1** to the Proposed Order. To the best of my knowledge, information, and belief, and insofar as I have been able to ascertain after reasonable inquiry and investigation and my investigation of the Books and Records, the Proofs of Claim, and all documentation submitted with the Proofs of Claim, each of the No Liability Arbitration Claims listed on **Schedule 1** represent Claims for which the Debtors do not have any liability. Furthermore, such Claims constitute Class 6C Claims under the Plan and no funds have been allocated under the Plan from the GUC Litigation Claims Settlement Cash to satisfy such claims.

11. No Liability Tax Claims. Upon the review of the Proofs of Claim filed in these cases, I, or someone at my direction, have identified the No Liability Tax Claims listed on **Schedule 2** to the Proposed Order. To the best of my knowledge, information, and belief, and insofar as I have been able to ascertain after reasonable inquiry and

investigation and my investigation of the Books and Records, the Proofs of Claim, and all documentation submitted with the Proofs of Claim, each of the No Liability Tax Claims listed on **Schedule 2** represent Claims for which the Debtors do not have any liability as more fully stated therein.

12. **No Liability Non-Tax Claims.** Upon the review of the Proofs of Claim filed in these cases, I, or someone at my direction, have identified the No Liability Non-Tax Claims listed on **Schedule 3** to the Proposed Order. To the best of my knowledge, information, and belief, and insofar as I have been able to ascertain after reasonable inquiry and investigation and my investigation of the Books and Records, the Proofs of Claim, and all documentation submitted with the Proofs of Claim, each of the No Liability Non-Tax Claims listed on **Schedule 3** represent Claims for which the Debtors do not have any liability as more fully stated therein.

Conclusion

13. Based upon my review of the Claims Register and the Books and Records, I believe that granting the relief requested in the Objection is in the best interest of the Debtors' estates and their creditors.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 29th day of March 2024.

/s/ Richard Niemerg

Richard Niemerg
Managing Director, Alvarez & Marsal North
America, LLC