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Counsel to the Debtors

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X		
In re	:	Chapter 11
	:	
Doral Financial Corporation, <i>et al.</i> , ¹	:	Case No. 15-10573 (SCC)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X		

**NOTICE OF FILING OF DORAL PROPERTIES, INC.’S
FIRST OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM**

PLEASE TAKE NOTICE that on August 24, 2016, Doral Properties, Inc. (the Debtor) filed the annexed first omnibus objection to certain proofs of claim (the “First Omnibus Objection to Claims”).

PLEASE TAKE FURTHER NOTICE that a hearing (the “Hearing”) to consider the First Omnibus Objection to Claims is currently scheduled to occur on **September 26, 2016 at 2:00 p.m. (prevailing Eastern Time)**, before the Honorable Shelley C. Chapman, United States

¹ The last four digits of the taxpayer identification number of the debtors are: Doral Financial Corporation (2162); Doral Properties, Inc. (2283).

Bankruptcy Court, at One Bowling Green, New York, NY 10004-1408. The Hearing may be continued from time to time without further notice other than the announcement by the Debtor in open court of the adjourned date(s) at the Hearing or at any continued hearing.

PLEASE TAKE FURTHER NOTICE that any party receiving this notice should review the First Omnibus Objection to Claims to see if its name and/or claim is located in the First Omnibus Objection to Claims or in Exhibit A attached thereto.

PLEASE TAKE FURTHER NOTICE that the deadline for filing objections to the First Omnibus Objection to Claims is **September 6, 2016 at 4:00 p.m. (prevailing Eastern Time)** (the "Objection Deadline"). Any responses or objections to the First Omnibus Objection to Claims shall be made in writing, shall conform to the *Order Establishing Certain Notice, Case Management, and Administrative Procedures and Omnibus Hearing Dates* [Docket No. 74], the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court for the Southern District of New York, shall set forth the name of the objecting party, the basis for the objection, and the specific grounds thereof, and shall be filed with the Bankruptcy Court by the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that if no objections are timely filed and served with respect to the First Omnibus Objection to Claims, the Debtor may, on or after the Objection Deadline, submit to the Court an order substantially in the form of the proposed order annexed to the First Omnibus Objection to Claims, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: August 24, 2016
New York, New York

/s/ Mark I. Bane
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UNITED STATES BANKRUPTCY COURT
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In re	:	Chapter 11
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Doral Financial Corporation, <i>et al.</i> , ¹	:	Case No. 15-10573 (SCC)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X		

**DORAL PROPERTIES, INC.’S FIRST OMNIBUS
OBJECTION TO CERTAIN PROOFS OF CLAIM**

Doral Properties, Inc., a debtor and debtor-in-possession in the above-captioned chapter 11 case (“Doral Properties”), hereby submits this first omnibus objection (the “First Omnibus Objection”) to (a) a claim that has been asserted against an incorrect party, (b) a claim that improperly asserts partial entitlement to priority under Bankruptcy Code section 507(a)(4), and (c) a duplicate claim, each as detailed below, and respectfully represents and sets forth as follows:

¹ The last four digits of the taxpayer identification number of the debtors are: Doral Financial Corporation (2162); Doral Properties, Inc. (2283).

Jurisdiction and Venue

1. This Court has jurisdiction over the Motion pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. The Motion is a core proceeding pursuant to 28 U.S.C. § 157(b). The statutory predicates for the relief requested herein are sections 501 and 502 of title 11 of the United States Code, 11 U.S.C. § 101, *et seq.* (the “Bankruptcy Code”) and Rule 3007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”).

Background

2. On March 11, 2015 (the “Petition Date”), Doral Financial Corporation (“DFC”) filed a voluntary petition in this Court for relief under chapter 11 of the Bankruptcy Code. On November 25, 2015, Doral Properties (together with DFC, the “Debtors”) filed a voluntary petition in this Court for relief under the Bankruptcy Code. The Debtors are authorized to continue to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in these Chapter 11 Cases. An Official Committee of Unsecured Creditors (the “UCC”) was appointed on March 23, 2015.

3. On December 29, 2015, Doral Properties filed its Schedules of Assets and Liabilities [Docket No. 449] and Statement of Financial Affairs [Docket No. 450] (collectively, the “Schedules”). On January 12, 2016, the Bankruptcy Court entered the *Order Establishing Deadlines to File Proofs of Claim and Approving the Form and Notice Thereof* [Docket No. 478] (the “Bar Date Order”), setting February 24, 2016 as the last day for general claimants to file proofs of claim against Doral Properties (the “General Bar Date”), and May 23, 2016 as the last day for governmental units to file proofs of claim against Doral Properties (the “Governmental Bar Date”).

4. A summary of the Debtors' business, the Debtors' capital structure, and the events leading to these Chapter 11 Cases are set forth in the *Declaration of Carol Flaton in Support of First Day Motions* [Docket. No. 8] (the "First Day Declaration").

Relief Requested

5. Doral Properties seeks entry of an order (the "Order"), substantially in the form attached as Exhibit A, (a) disallowing each of the claims (the "Objectionable Claims") identified on Schedule 1, Schedule 2, and Schedule 3 to Exhibit A, each as discussed in further detail below, and (b) authorizing Doral Properties' claims agent, Garden City Group, LLC ("GCG"), to expunge each of the Objectionable Claims from the official claims register maintained by GCG (the "Claims Register").

6. Doral Properties has reviewed its books and records and the Schedules in conjunction with analyzing proofs of claim. In this process, Doral Properties has identified certain proofs of claim which should be disallowed, expunged, and/or reclassified based on the grounds set forth in Bankruptcy Rule 3007(d).

7. Pursuant to Bankruptcy Rule 3007(d), Doral Properties may, through an omnibus objection, object to claims "if all the claims were filed by the same entity" or if, among other things, the claims duplicate other claims, were filed in the wrong case, were presented in a form that does not comply with applicable rules, or assert priority in an amount that exceeds the maximum amount under § 507 of the Bankruptcy Code. Bankruptcy Rule 3007(d).

8. Each of the Objectionable Claims was filed by Jones Lang LaSalle PR Inc. ("Jones Lang").

9. In support of this First Omnibus Objection, Doral Properties submits the *Declaration of Scott Martinez in Support of Doral Properties, Inc.'s First Omnibus Claims Objection* (the "Martinez Declaration"), attached as Exhibit B.

10. Doral Properties requests entry of an order granting the relief requested herein with respect to the Objectionable Claims. Doral Properties submits that allowing the Objectionable Claims would result in improper recoveries.

A. Doral Bank Claim

11. Pursuant to Bankruptcy Rule 3007(d)(2), Doral Properties hereby objects to the proof of claim identified on Schedule 1 to Exhibit A (the “Doral Bank Claim”). The Doral Bank Claim is a claim filed by Jones Lang regarding which Doral Properties has no liability and which should not have been filed in Doral Properties’ bankruptcy case. This claim appears to be a claim by Jones Lang against DFC’s former subsidiary, Doral Bank Puerto Rico (“Doral Bank”). Doral Bank is in receivership, with the Federal Deposit Insurance Corporation (“FDIC”) as receiver. The Doral Bank Claim includes a claim for which the claimant attached documentation supporting a claim against Doral Bank, including, without limitation, a contract to which Doral Bank, not Doral Properties, is the counterparty, and for which the claimant attached correspondence indicating that the claim was already filed with the FDIC, as receiver for Doral Bank. Doral Properties has also reviewed its records and found no evidence that the Doral Bank Claim is valid against Doral Properties. Doral Properties accordingly requests that the Doral Bank Claim be expunged.

B. Alleged Wage Claim

12. Pursuant to Bankruptcy Rule 3007(d)(8), Doral Properties hereby objects to the proof of claim identified on Schedule 2 to Exhibit A (the “Alleged Wage Claim”). In the Alleged Wage Claim, Jones Lang asserts claims on account of facility management services (as defined in the Alleged Wage Claim). Jones Lang asserts a portion of the Alleged Wage Claim, \$7,670, as a priority claim under Bankruptcy Code section 507(a)(4) for wages, salaries, or commissions earned within 180 days prior to the petition.

13. Jones Lang is a business entity, not a natural person, and was a third party vendor to Doral Properties, not an employee. Jones Lang has no entitlement to a priority claim under Bankruptcy Code section 507(a)(4). Accordingly, Doral Properties requests that the Court enter an Order eliminating the priority portion of the Alleged Wage Claim and allowing the Alleged Wage Claim as a General Unsecured Claim² in the amount of \$10,026.96.

C. Duplicate Claim

14. Pursuant to Bankruptcy Rule 3007(d)(1), Doral Properties hereby objects to the proof of claim identified on Schedule 3 to Exhibit A (the “Duplicate Claim”). The Duplicate Claim is a third claim filed by Jones Lang and is substantively duplicative of the Alleged Wage Claim discussed above. Failure to disallow the Duplicate Claim would result in Doral Properties facing double liability on account of the facility management services. Doral Properties accordingly requests that the Duplicate Claim be expunged.

15. Based on the foregoing, Doral Properties submits that the relief requested in the First Omnibus Objection is necessary and appropriate, is in the best interests of Doral Properties’ estate and creditors, and should be granted in all respects.

Reservation of Rights

16. Notwithstanding anything contained herein to the contrary, Doral Properties reserves all rights and defenses, including, among other things, to further object to any proofs of claim that are not disallowed or expunged by the First Omnibus Objection on any basis, and to seek to disallow, expunge, reduce, or reclassify such proofs of claim. Doral Properties may file additional objections, as appropriate, as Doral Properties continues to analyze and reconcile claims.

² As defined in the *Chapter 11 Plan of Liquidation for Doral Properties, Inc.* [Docket No. 612] (the “Plan of Liquidation”).

Notice

17. Notice of this First Omnibus Objection has been provided to the Master Service List provided for in the *Order Establishing Certain Notice, Case Management, and Administrative Procedures and Omnibus Hearing Dates* [Docket No. 74] and to all claimants who have asserted Objectionable Claims.

WHEREFORE, Doral Properties respectfully requests the Court enter an Order, in substantially the form attached to the Motion as Exhibit A; (i) granting the First Omnibus Objection as set forth herein, and (ii) granting such other and further relief as is just and proper.

Dated: New York, New York
August 24, 2016

/s/ Mark I. Bane
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Counsel to the Debtors

Exhibit A

Proposed Order

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re : Chapter 11
: :
Doral Financial Corporation, *et al.*,¹ : Case No. 15-10573 (SCC)
: :
Debtors. : (Jointly Administered)
: :
-----X

**ORDER GRANTING DORAL PROPERTIES, INC.’S
FIRST OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM**

Upon the first omnibus objection (the “First Omnibus Objection”) of Doral Properties, Inc. (the “Debtor”) to certain proofs of claim;² and it appearing that this Court has jurisdiction to consider the First Omnibus Objection pursuant to 28 U.S.C. §§ 157 and 1334; and it appearing that venue of the First Omnibus Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that the First Omnibus Objection is a core proceeding pursuant to 28 U.S.C. § 157(b); and the Court having considered the declaration of Scott Martinez in support of the First Omnibus Objection; and the Court having determined that the relief requested in the First Omnibus Objection is in the best interests of the Debtor, its estate, its creditors, and other parties-in-interest; and it appearing that proper and adequate notice of the First Omnibus Objection has been given and that no other or further notice is necessary; and after due deliberation thereon; and good and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The First Omnibus Objection is GRANTED to the extent provided herein.

¹ The last four digits of the taxpayer identification number of the debtors are: Doral Financial Corporation (2162); Doral Properties, Inc. (2283).

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

2. The Doral Bank Claim, identified on Schedule 1 attached to this Order, is hereby disallowed and expunged in its entirety.

3. The Alleged Wage Claim, identified on Schedule 2 attached to this Order, is hereby reclassified as an allowed General Unsecured Claim, as defined in the Plan of Liquidation, in the amount of \$10,026.96.

4. The Duplicate Claim, identified on Schedule 3 attached to this Order, is hereby disallowed and expunged in its entirety.

5. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in this Order shall be construed as or in any way constitute a waiver of the rights of the Debtor, or any party in interest, to assert any defenses and objections to any claims or proofs of claim, including those identified on Schedules 1, 2, and 3 attached to this Order, and to seek to disallow, expunge, reduce, or reclassify such proofs of claim, on any basis, and all such rights are hereby reserved and preserved.

6. Notwithstanding the relief granted in the Order and any actions taken pursuant to such relief, nothing in this Order shall create, nor is intended to create, any rights in favor of, or enhance the status of, any claim held by any person or entity.

7. The Debtor and GCG are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

8. The requirements of Rule 9013-1 of the Local Bankruptcy Rules are deemed satisfied.

9. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation and enforcement of the Order.

Dated: New York, New York
_____, 2016

HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE

Schedule 1

Doral Bank Claim			
Name of Claimant	Date Filed	Claim Number	Alleged Claim Amount and Classification
Jones Lang LaSalle PR Inc.	2/26/16	131	\$12,475.00 (priority) \$53,728.78 (unsecured)

Schedule 2

Alleged Wage Claim			
Name of Claimant	Date Filed	Claim Number	Alleged Claim Amount and Classification
Jones Lang LaSalle PR Inc.	2/24/16	130	\$7,670.00 (priority) \$10,026.96 (unsecured)

Schedule 3

Duplicate Claim			
Name of Claimant	Date Filed	Claim Number	Alleged Claim Amount and Classification
Jones Lang LaSalle PR Inc.	2/26/16	132	\$7,670.00 (priority) \$10,026.96 (unsecured)

Exhibit B

Martinez Declaration

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
 In re : Chapter 11
 :
 Doral Financial Corporation, et al.,¹ : Case No. 15-10573 (SCC)
 :
 Debtors. : (Jointly Administered)
 -----X

**DECLARATION OF SCOTT MARTINEZ IN
 SUPPORT OF DORAL PROPERTIES, INC.’S
 FIRST OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM**

I, Scott Martinez, pursuant to 28 U.S.C. § 1746, declare:

1. I am an employee and Director of Zolfo Cooper, LLC, the direct parent of Zolfo Cooper Management, LLC, a New Jersey limited liability company (collectively, “Zolfo Cooper”). Zolfo Cooper is the restructuring advisor to Doral Financial Corporation (“DFC”). I am also the Chief Restructuring Officer of Doral Properties, Inc. (the “Debtor”), DFC’s wholly-owned subsidiary. The information included in this declaration (the “Declaration”) concerning the Debtor is based upon my personal knowledge, information supplied to me by members of the Debtor’s management or its professionals, my review of relevant documents, or my opinion based upon my personal experience and knowledge of the Debtor’s operations and financial condition. I am duly authorized to make this Declaration in support of Doral Properties, Inc.’s First Omnibus Objection to Certain Proofs of Claim (the “First Omnibus Objection”).²

Omnibus Objection

2. The Debtor has reviewed its books and records and the Schedules in conjunction with analyzing proofs of claim filed in the Debtor’s chapter 11 case. While this process is still

¹ The last four digits of the taxpayer identification number of the Debtors are: Doral Financial Corporation (2162); Doral Properties, Inc. (2283).

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

ongoing, the Debtor has identified certain proofs of claim (the "Objectionable Claims") which the Debtor believes should be disallowed, expunged, and/or reclassified as set forth in the First Omnibus Objection, described as follows:

3. Doral Bank Claim. The Doral Bank Claim, claim number 131, is a claim for which Doral Properties has no liability because, to the best of my knowledge and understanding, this claim is a claim against Doral Bank's estate, in receivership with the FDIC, and not against Doral Properties. The claim has therefore been filed in the wrong case or proceeding.

4. Alleged Wage Claim. The Alleged Wage Claim, claim number 130, incorrectly asserts a Bankruptcy Code section 507(a)(4) priority claim. The Alleged Wage Claim is asserted by a business entity, not a natural person, that was a third party vendor for the Debtor.

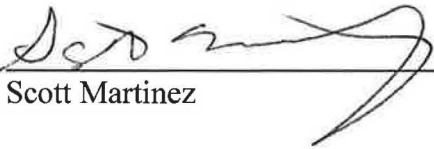
5. Duplicate Claim. The Duplicate Claim, claim number 132, is substantively duplicative of claim number 130 (the Alleged Wage Claim), and the allowance of the Duplicate Claim would result in Doral Properties facing double liability for the underlying claim.

6. Based on the foregoing, as described herein and in the First Omnibus Objection, the Debtor submits that the relief requested in the First Omnibus Objection is necessary and appropriate, is in the best interests of the Debtor's estate and creditors, and should be granted in all respects.

Declaration

Pursuant to section 1746 of title 28 of the United States Code, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: New York, New York
August 19, 2016



Scott Martinez