GARFUNKEL WILD, P.C. 111 Great Neck Road Great Neck, New York 11021 Phone: (516) 393-2200 Fax: (516) 466-5964 Burton S. Weston Adam T. Berkowitz Phillip Khezri

Attorney for Estates and Plan Administrator

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SOUND SHORE MEDICAL CENTER OF
WESTCHESTER, et al.,
Case No.: 13-22840 (RDD)
Debtors.

PLAN ADMINISTRATOR'S FIFTEENTH OBJECTION TO ALLOWANCE OF CERTAIN PROOFS OF CLAIM

(Employee Claims for which the "Debtors are not Liable", which were "Previously Satisfied", which lack "Sufficient Support", and/or which were "Incorrectly Classified")

Monica Terrano, as Plan Administrator (the "Plan Administrator") for the estates of Sound Shore Medical Center of Westchester, and its affiliated debtors (collectively, the "Estates"), by and through her counsel, hereby submits this application (the "Application") for entry of an Order pursuant to 11 USC § 502 and Fed. R. Bankr. P. 3007 reducing or disallowing and expunging certain proofs of claim identified on Exhibit A which were filed by former non-union employees (the "Employee Claims") seeking either: (a) reimbursement for terminal benefits for which the Debtors are not liable to pursuant to the Debtors' Personnel Policy Manual (the "Personnel Policy") and/or the terms of the Debtors' retirement plan (the "Retirement Plan"); and/or (b) for alleged unpaid wages, which the Debtors previously satisfied with a prior payment; and/or (c) miscellaneous other employer related claims for which the Debtors are not

liable or for which the claimants failed to provide sufficient supporting documentation. In support of the Application, the Plan Administrator represents as follows:

BACKGROUND

- 1. On May 29, 2013 (the "Petition Date"), Sound Shore Medical Center of Westchester, and its affiliates (each a "Debtor" and together the "Debtors,"), each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") with the United States Bankruptcy Court for the Southern District of New York (the "Court"). Pursuant to Sections 1107 and 1108 of the Bankruptcy Code, the Debtors continued to administer their affairs as debtors-in-possession.
- 2. On June 10, 2013, the United States Trustee appointed an Official Committee of Unsecured Creditors (the "Committee"). [Docket No. 67]. The Committee retained Alston Bird, LLP as its counsel. No Trustee or examiner was appointed in the cases.
- 3. On June 3, 2013, this Court granted an order to employ GCG, Inc. ("GCG"), as the Debtors' Claims and Noticing agent [Docket No. 41].
- 4. On June 28, 2013, the Debtors filed their respective schedule of assets and liabilities and statement of financial affairs (the "Schedules") [Docket Nos. 125, 127, 129, 131, 133, 135, 137].
- 5. By order of this Court dated July 25, 2013 (the "Bar Date Order") [Docket No. 194], with certain exceptions, the general deadline for the filing of proofs of claim against the Debtors was established as September 16, 2013 (the "Bar Date") and the deadline for governmental units to file claims against the Debtors was established as November 25, 2013. On

August 9, 2013, the Debtors caused written notice of the Bar Date to be mailed to the Debtors' known and potential creditors [Docket No. 265]. In addition, on August 15, 2013, the Debtors caused notice of the Bar Date to be published in the <u>The New York Times</u> [Docket No. 299].

- 6. Thereafter, on December 13, 2013, an order was entered establishing January 31, 2014 (the "Administrative Bar Date") as the deadline for the filing of all administrative proofs of claim against the Debtors (the "Administrative Bar Date Order") [Docket No. 490]. On December 19, 2013, the Debtors caused written notice of the Administrative Bar Date to be mailed to the Debtors' known and potential creditors [Docket No. 516]. Additionally, on December 26, 2013, the Debtors caused notice of the Administrative Bar Date to be published in The New York Times Local Edition [Docket No. 622].
- 7. On November 6, 2014, the Court entered an Order (the "Confirmation Order") confirming the Debtors' First Amended Plan of Liquidation Under Chapter 11 of the Bankruptcy Code of Sound Shore Medical Center of Westchester, *et al.* (the "Plan") [Docket No. 908]. Pursuant to the Confirmation Order, Monica Terrano has been appointed as Plan Administrator. Pursuant to the Plan, the Plan Administrator has the authority, among other things, to object to claims on behalf of the Estates.
- 8. On December 9, 2014, the Debtors filed their Notice of (I) Entry of Order Confirming Debtors' First Amended Plan of Liquidation; (II) Occurrence of Effective Date of Plan; (III) Supplemental Administrative Claims Bar Date; (IV) Professional Fee Claims Bar Date; and (V) Bar Date for Proofs of Claim Relating to Executory Contracts Rejected Pursuant to Plan declaring the Plan to be "effective" [Docket No. 940].

JURISDICTION

9. This Court has jurisdiction over this Application pursuant to 28 U.S.C. § 1408. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(B). The statutory predicates for the relief requested herein are Section 502 of the Bankruptcy Code and Rules 3001 and 3002 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules").

RELIEF REQUESTED

- 10. Since the passing of the Bar Date and the Administrative Bar Date, the Plan Administrator, together with her counsel and advisors, has reviewed the Debtors' books and records to identify objectionable claims. As a result of this review, certain objectionable claims have been uncovered which are addressed by this Fifteenth Objection.
- 11. The claims that are the subject of this Fifteenth Objection are those claims which were filed by former non-union employees for obligations for which the Debtors' estates are not liable and/or for obligations the Debtors previously satisfied.
- 12. Upon examining the proofs of claim identified on Exhibit A, the Plan Administrator determined that each such claim was filed by a former employee seeking reimbursement for either: (A) accrued and unused sick time ("Sick Time"); (B) accrued and unused vacation time ("Vacation Time"); (C) accrued and unused holiday/free-day time ("Holiday Time"); (D) 3% salary reduction back pay ("3% Back Pay"); (E) unpaid contributions to the Retirement Plan ("Retirement Contributions"); (F) one week's worth of unpaid salary ("Lag Pay"); and/or (G) other miscellaneous employer related expenses categories ("Other

<u>Claims</u>")¹. After comparing the Employee Claims to the Debtors' books and records, the Plan Administrator objects to the Employee Claims as follows:

Sick Time

- 13. The Plan Administrator reviewed certain Employee Claims seeking reimbursement for accrued sick hours which were earned, but unused, by employees prior to the termination of their employment.
- 14. The Debtors' obligations as to Sick Time for non-union employees is governed by the Debtors' Personnel Policy. Subsection 1 of Section IV of the Personnel Policy states:

Terminal Sick time pay

Employees will <u>not</u> receive pay for unused or banked sick time when they separate employment. (emphasis added)

15. Accordingly, the Debtors have no liability for the payment of unused Sick Time and, therefore, the Plan Administrator objects to and seeks to disallow and expunge the Employee Claims to the extent they are based on Sick Time.

Vacation Time

- 16. The Plan Administrator reviewed certain Employee Claims seeking reimbursement for accrued vacation hours which were earned, but unused, by employees prior to the termination of their employment.
- 17. The Debtors' obligations as to Vacation Time for non-union employees is governed by the Debtors' Personnel Policy. Subsection 3 of Section IV of the Personnel Policy, states:

¹ The Plan Administrator has marked each claim included in Exhibit A to indicate whether such claim is seeking reimbursement for Sick Time, Holiday Time, Vacation Time, 3% Back Pay, Retirement Contributions, Lag Pay, and/or Other Claims.

Terminal Vacation pay

Employees will <u>not</u> receive pay for unused, unbanked vacation time when they separate employment. (emphasis added)

- 18. The Personnel Policy does not include a current provision for banking vacation time and, except as set forth below, did not previously have such a policy. Accordingly, the Debtors have no liability for the payment of unbanked Vacation Time and, therefore, the Plan Administrator objects to and seeks to disallow and expunge the Employee Claims to the extent they are based on unbanked Vacation Time.
- 19. As noted, the Personnel Policy does include provisions creating two limited bank periods for Vacation Time. The first bank was for accrued and unused time earned up to December 31, 1989 for managerial employees classified as E1 or E2 and all physicians (the "89 Bank"). The 89 Bank was uncapped. The second bank was created for all employees and encompassed accrued and unused vacation time from January 1, 1990 through December 31, 1994 (the "94 Bank"). The 94 Bank was capped at 30 work days' worth of Vacation Time.
- 20. Therefore, upon their termination, employees were entitled to compensation only for Vacation Time banked on or before December 31, 1989 and for up to 30 days' worth of Vacation Time banked between January 1, 1990 and December 31, 1994 (collectively, the "Maximum Bank"). Accordingly, the Debtors have no liability for banked Vacation Time which exceeds the Maximum Bank and, therefore, the Plan Administrator objects to and seeks to disallow and expunge the Employee Claims to the extent they are based on banked Vacation Time which exceeds the Maximum Bank. In addition the Plan Administrator objects to the Employee Claims to the extent they assert claims for banked Vacation Time which does not match the Debtors' Books and Records. Moreover, because no banked Vacation Time could

have been earned after December 31, 1994, a date more than 180 days before the Petition Date, all banked Vacation Time, to the extent otherwise allowable, must be recharacterized as a general unsecured claim.

Holiday Time

- 21. The Plan Administrator reviewed certain Employee Claims seeking reimbursement for accrued holiday and free hours which were earned, but unused, by employees prior to the termination of their employment.
- 22. The Debtors' obligations as to Holiday Time for non-union employees is governed by the Debtors' Personnel Policy. Subsection 2 of Section IV of the Personnel Policy, states:

Terminal Holiday/ Free Day pay

Employees will <u>not</u> receive pay for unused, unbanked holiday and free day time when they separate employment. (emphasis added)

- 23. The Personnel Policy does not include a provision for banking Holiday Time, and it was the Debtors' practice to not compensate employees for unused Holiday Time when their employment terminated.
- 24. Accordingly, the Debtors have no liability for the payment of unused Holiday Time and, therefore, the Plan Administrator objects to and seeks to disallow and expunge the Employee Claims to the extent they are based on Holiday Time.

3% Back Pay

25. The claims for Back Pay stem from a 2007 letter the Debtors' management sent to employees which stated that employee salaries would be reduced by 3% from July 2007 to

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January 2008 (the "<u>Reduction Period</u>") due to financial constraints on the Debtors. In exchange for the reduction, employees received five additional vacation days.

- 26. Upon expiration of the Reduction Period, employee salaries were not reinstated to their full rate, but remained reduced by 3% until 2011. Employees were orally informed by the Debtors' management that they would be reimbursed for the 3% Back Pay that was not reinstated from the end of the Reduction Period through 2011.
- 27. The Plan Administrator is not objecting Employee Claims solely on the basis of a request for reimbursement of 3% Back Pay. The Plan Administrator reviewed the calculations for determining the 3% Back Pay and determined that many of the Employee Claims overstated the amount they are entitled to for 3% Back Pay. Accordingly, the Plan Administrator objects to the portion of Employee Claims based on 3% Back Pay to the extent such claims do not correspond to the Debtors' books and records. In addition, because no portion of the 3% Back Pay was earned during the 180 day period prior to the Petition Date, the Plan Administrator seeks to recharacterize the portion of Employee Claims for 3% Back Pay as general unsecured claims.

Retirement Contributions

28. In 1999, the Debtors established the Retirement Plan. As evidenced by the language of the Retirement Plan, the Debtor has always retained the discretion whether or not to make any employer contributions to the Retirement Plan for a given year. For example, Section 3.1 of the Retirement Plan provides for the level of Debtors' "contributions, if any," whereas Section 3.2 of the Retirement Plan provides how such "Employer Contributions, if any," shall be allocated. Since the Plan's inception in 1999, Section 3.1 of the Retirement Plan has always, in

relevant part, provided that "Each Plan Year the Employer will contribute to the Plan such amount . . . as it may in its sole discretion determine"

29. The January 1, 2009 restatement of the Retirement Plan, which received a favorable IRS determination letter on October 12, 2010, reiterated this point by clarifying section 3.2 to read, in relevant part, as follows:

[I]f the Employer elects in its discretion, in accordance with the provisions of Section 3.1, to make a contribution for any given Plan Year, the contribution made by the Employer, if any, to the Trust Fund for each such Plan Year will be allocated . . .

- 30. Section 3.1 has always, to the Debtors' knowledge and belief, since the Retirement Plan's inception, given the Debtors the discretion whether or not to make any employer contributions to the Retirement Plan for any given year. Therefore, any claim against the Debtors' estates in respect of contributions due to be made to the Retirement Plan are without merit, as there can be no contributions due to the Retirement Plan unless the Debtors have exercised their discretion to make the contribution by actually making the contribution.
- 31. Accordingly, the Debtors have no liability for contributions to Retirement Plan and, therefore, the Plan Administrator objects to and seeks to disallow and expunge the Employee Claims to the extent they are based on Retirement Contributions.²

² Additionally, on November 12, 2013, the Employee Benefits Security Administration of the United States Department of Labor (the "<u>DOL</u>") filed a claim in this case [Claim No. 1420] for alleged unpaid employer contributions into the Retirement Plan since 2004. The DOL's claim states that, "the money claimed by the [DOL] is owed to the [Retirement] Plan or its participants and beneficiaries. The [DOL] requests that payments be made directly to the [Retirement] Plan (or, if appropriate, to its participants or beneficiaries), and <u>not</u> to the department." Subsequent to filing its proof of claim, the DOL conducted an investigation and ultimately issued the Debtors a letter, determining that no further action was necessary. The DOL has since withdrawn its proof of claim.

Lag Pay

- 32. Until August 2012, the Debtors paid their employees bi-weekly, with pay checks or direct deposits being made to employees the week after the earning period ended. In September 2012, due to financial difficulties, the Debtors had to delay payments to employees for one week (the "Amended Pay Schedule"). On or around September 6, 2012, a letter was provided to all employees explaining the change in pay schedules.
- 33. The Amended Pay Schedule continued through termination of the Debtor' Employees. While the Amended Pay Schedule created a change in the timing of when Employee received their pay, it did not create a gap in payments to Employees. All Employees received pay in full through their final day of employment.
- 34. Accordingly, the Plan Administrator objects to the portion of Employee Claims based on Lag Pay and such claims must be disallowed and expunged to the extent they are asserted for Lag Pay.

Other Claims

35. In addition to the above categories, certain Employee Claims included claims for miscellaneous items, which in some instances, the Plan Administrator objects to. The basis for the Plan Administrator's objections to the Other Claims are either because the Debtors are not liable for such claims or because the claims lack sufficient supporting documentation. To the extent the Plan Administrator has identified claims which fall within the "Other" category, they are included as category "G" on Exhibit A and an explanation has been provided for the basis of the objection.

36. The Plan Administrator thus seeks entry of an order or orders pursuant to Section 502 of the Bankruptcy Code and Rule 3001 of the Federal Rules of Bankruptcy Procedure disallowing and expunging the Employee Claims on Exhibit A.

BASIS FOR RELIEF REQUESTED

- 37. Section 502 of the Bankruptcy Code provides, in pertinent part, as follows:
 - (a) A claim or interest, proof of which is filed, under section 501 of this title, is deemed allowed, unless a party in interest, including a creditor of a general partner in a partnership, that is a debtor in a case under chapter 7 of this title, objects.

11 U.S.C. § 502(a).

- 38. Pursuant to Bankruptcy Rule 3001(f), a properly executed and filed proof of claim constitutes *prima facie* evidence of the validity and the amount of the underlying claim under section 502(a) of the Bankruptcy Code. *See* Fed. R. Bankr. P. 3001(f). To receive the benefit of *prima facie* validity, however, "the proof of claim must 'set forth facts necessary to support the claim.". *In re Chain*, 255 B.R. 278, 280 (Bankr. D.Conn. 2000) (quoting *In re Marino*, 90 B.R. 25, 28 (Bankr. D. Conn. 1988)).
- 39. As set forth herein, the Plan Administrator has diligently and carefully reviewed and scrutinized each of the proofs of claim filed in this case and has determined that the claims set forth on Exhibit A hereto are not claims for which the Debtors are liable or because such claims were previously satisfied through payment by the Debtors. The Plan Administrator thus seeks to reduce or disallow and expunge each of the objectionable claims identified on Exhibit A.

RESERVATION OF RIGHTS

40. The Plan Administrator reserves all rights to object to any surviving claims asserted against the Debtors, as identified on the annexed exhibits, whether asserted or unasserted by any of the claimants affected by the Application against the Debtors. Should one or more of the objections addressed herein be denied or dismissed, the Plan Administrator reserves her rights to further object to the disputed claim on any other grounds, discovered by the Plan Administrator during the pendency of this case.

NOTICE

41. Notice of this Fifteenth Objection will be given by mailing a copy of this Fifteenth Objection and the proposed order to (i) the Office of the United States Trustee for this district, (ii) counsel for the Committee, (iii) each of the claimants listed on Exhibit A, at their respective addresses as set forth on such exhibit, and (iv) each of the entities who have filed a notice of appearance in accordance with Bankruptcy Rule 2002 and all other parties required to be notified under the Case Management Order. In addition, as required under the Order Approving Omnibus Claim Objection Procedures [Docket No. 1036], each claimant whose claim is subject to this Fifteenth Objection has received, in such claimant's respective notice packet, a separate individualized notice informing the claimant that its claim is covered by this Fifteenth Objection and that the failure to timely oppose the objection, as set forth in the notice, may result in the grant of the relief requested by this Fifteenth Objection.

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WHEREFORE, the Plan Administrator respectfully requests that the relief requested herein be granted and this Court enter an order, substantially in the form annexed hereto as Exhibit B, and grant such other and further relief as is just and proper.

Dated: Great Neck, New York April 18, 2016

GARFUNKEL WILD, P.C. Counsel for the Plan Administrator

By:

Burton S. Weston Adam T. Berkowitz

Phillip Khezri

111 Great Neck Road Great Neck, NY 11021

(516) 393-2200

GARFUNKEL WILD, P.C. 111 Great Neck Road Great Neck, New York 11021 Telephone: (516) 393-2200 Facsimile: (516) 466-5964 Burton S. Weston Adam T. Berkowitz Phillip Khezri

Counsel for the Debtors and Debtors-in-Possession

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

SOUND SHORE MEDICAL CENTER OF WESTCHESTER, et al. 1

Chapter 11 Case No. 13-22840 (RDD)

Debtors.

(Jointly Administered)

DECLARATION OF MONICA TERRANO IN SUPPORT OF FIFTEENTH OMNIBUS OBJECTION TO CLAIMS

STATE OF NEW YORK)

) ss. COUNTY OF NASSAU)

Pursuant to 28 U.S.C. § 1746, I, Monica Terrano, hereby declare:

1. I am the Plan Administrator ("PA") for the Estate of Sound Shore Medical Center of Westchester, and its debtor affiliates (the "Estate"). In my capacity as the PA, I am authorized to submit this declaration (the "Declaration") in support of the Estate's Fifteenth Omnibus Objection to Claims (the "Fifteenth Objection")².

¹ The debtors in these chapter 11 cases, along with the last four digits of each debtor's federal tax identification number include: Sound Shore Health System, Inc. (1398), Sound Shore Medical Center of Westchester (0117), The Mount Vernon Hospital (0115), Howe Avenue Nursing Home, Inc., d/b/a Helen and Michael Schaffer Extended Care Center (0781), NRHMC Services Corporation (9137), The M.V.H. Corporation (1514) and New Rochelle Sound Shore Housing, LLC (0117). There are certain additional affiliates of the Debtors who are not debtors and have not sought relief under Chapter 11.

² Capitalized terms, unless herein defined, shall have the meaning ascribed to them in the Omnibus Objection.

- 2. Except as otherwise indicated, all facts set forth in this Declaration are based upon: (a) my personal knowledge; (b) my review of relevant documents, including, without limitation, Proofs of Claim (as defined below), and correspondence by the Debtors' Employee Benefits Counsel, Smith & Downey, P.A.; (c) my experience and knowledge of the Estate's prior operations, books and records and personnel; and (d) 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 Estate. If called upon to testify, I could and would testify to the facts set forth herein on that basis.
- 3. I am a Certified Public Accountant with over 17 years of experience in the healthcare industry. Over the past seven years, I have worked primarily on Chapter 11 cases relating to hospital restructurings and/or liquidations. During this time, I have specialized in all aspects of bankruptcy case administration, including claims review and reconciliation, and the preparation of related statements and required schedules and have been focusing primarily on bankrupt hospitals.

CLAIMS ADMINISTRATION PROCESS

4. Since the expiration of the General Bar Date and Governmental Bar Date, considerable time and effort has been expended by the Estate and its professionals and advisors in connection with the claims administration process to ensure a high level of diligence in reviewing and reconciling hundreds of proofs of claim (the "Proofs of Claim") filed in connection with these Chapter 11 cases. Working directly with the Estates' professionals and advisors, I personally reviewed, analyzed and considered the merits of each Proof of Claim and determined that the claims covered by the Fifteenth Objection were subject to objection.

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Throughout the process, I regularly interfaced with the Estate's professionals and advisors to

address potential legal issues impacting the claims.

THE EMPLOYEE CLAIMS

5. I am generally familiar with the information contained in the Fifteenth Objection.

Based on my review of the Proofs of Claim, I assisted the Estate's bankruptcy counsel in the

preparation of the Fifteenth Objection and related schedules by identifying claims filed by

former non-union employees for which the Debtors are not liable, which have been satisfied,

which do not match the Debtors' books and records, which lack sufficient support, and/or which

were incorrectly classified (the "Employee Claims").

6. In evaluating the Employee Claims, the Debtors and its advisors performed in-

depth comparisons of the claims reflected on the Debtors' books and records, and each of the

filed proofs of claim (including supporting documentation) and ultimately determined that each

Employee Claim, either in whole or part, was not a liability of the Debtors' estate, had been

previously satisfied, did not match the Debtors' books and records, and/or was incorrectly

classified. Therefore, I believe that reduction, disallowance and expungement, and/or

recharacterization of the Employee Claims, for the reasons set forth in the Fifteenth Objection, is

appropriate.

I declare under penalty of perjury under the laws of the United States of America that the

foregoing is true and correct.

Dated: April 18, 2016

Great Neck, New York

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EXHIBIT A

EMPLOYEE CLAIMS

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	l			B - Asserted Vacation	C - Asserted Holiday		E - Asserted	F- Asserted Lag	G - Asserted		
Creditor Name	Claim #	Total Stated Claim	A - Asserted Sick Time	Time	Time	D- Asserted 3% Back Pay	Retirement Contributions	Pay	Other Claims	Proposed Surviving Claim	Basis for Objection
ALEXANDER, GIRLIE 54 6TH ST PELHAM, NY 10803-1126	941	Total Stated Claim: \$12,568.00 Total Administrative Claim: \$0.00 Total Priority Claim: \$12,568.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00				\$6,427.84	\$3,656.00	\$2,484.16		Unsecured: \$6,427.84	D: The Debtors do not object to an amount of \$6,427.84 for 3% Back Pay E: The Debtors have no obligation for Retirement Contributions F: Lag Pay has been previously satisfied
BAKOS, PATRICIA 14 ENTRANCE WAY VALHALLA, NY 10595-2025		Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00	\$52,599.60	\$4,057.73		\$11,545.77	\$89,114.37	\$2,200.56	'	Unsecured: \$16,852.54	A: The Debtors have no obligation for Sick Time B: The Debtors' books and records reflect 153.18 hours of banked vacation time totaling \$5,306.77 D: The Debtors' books and records reflect an amount of \$11,545.77 for 3% Back Pay E: The Debtors have no obligation for Retirement Contributions F: Lag Pay has been previously satisfied
BARONE, RICHARD P MD 39 HOLBROOKE RD WHITE PLAINS, NY 10605-4018	921	Total Stated Claim: \$147,000.00 Total Administrative Claim: \$0.00 Total Priority Claim: \$147,000.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00					\$147,000.00			Unsecured: \$0	E: The Debtors have no obligation for Retirement Contributions
BARONE, RICHARD P 39 HOLBROOKE RD WHITE PLAINS, NY 10605		Total Stated Claim: \$94,466.00 Total Administrative Claim: \$0.00 Total Priority Claim: \$94,466.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00					\$94,466.00			Unsecured: \$0	E: The Debtors have no obligation for Retirement Contributions
BASAK, PRASANTA 19 LOCUST ST GREENVALE, NY 11548-1110	761	Total Stated Claim: \$3,365.56 Total Administrative Claim: \$0.00 Total Priority Claim: \$3,365.56 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00						\$3,365.56		Unsecured: \$0	F: Lag Pay has been previously satisfied
BLAKIME, EVELYNE 14 POPLAR ST YONKERS, NY 10701-4330		Total Stated Claim: \$24,559.00 Total Administrative Claim: \$0.00 Total Priority Claim: \$24,559.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00					\$24,559.00			Unsecured: \$0	E: The Debtors have no obligation for Retirement Contributions
BLAKIME, EVELYNE 14 POPLAR ST YONKERS, NY 10701-4330	905	Total Stated Claim: \$40,406.11 Total Administrative Claim: \$0.00 Total Priority Claim: \$24,559.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$15,847.11	\$15,847.11				\$24,559.00			Unsecured: \$0	A: The Debtors have no obligation for Sick Time E: The Debtors have no obligation for Retirement Contributions
BRISCO, LENWORTH 3254 FENTON AVE BRONX, NY 10469	965	Total Stated Claim: \$78,654.25 Total Administrative Claim: \$0.00 Total Priority Claim: \$11,259.90 Total Secured Amount: \$0.00 Total Unsecured Amount: \$67,394.35	\$39,231.00	\$10,134.68	\$326.90	\$7,820.41	\$31,006.97	\$1,394.20		Unsecured: \$7,820.41	A: The Debtors have no obligation for Sick Time B: The Debtors' books and records reflect 0 hours of banked vacation time C: The Debtors have no obligation for Holiday Time D: The Debtors' books and records reflect an amount of \$7,820.41 for 3% Back Pay E: The Debtors have no obligation for Retirement Contributions F: Lag Pay has been previously satisfied
CAPELIAN, DAMARIS 1 LINN PL YONKERS, NY 10705	964	Total Stated Claim: \$40,483.11 Total Administrative Claim: \$0.00 Total Priority Claim: \$8,369.15 Total Secured Amount: \$0.00 Total Unsecured Amount: \$32,113.96	\$15,261.30	\$4,805.70	\$984.60	\$5,725.64	\$22,078.02			Unsecured: \$5,725.64	A: The Debtors have no obligation for Sick Time B: The Debtors' books and records reflect 0 hours of banked vacation time C: The Debtors have no obligation for Hollday Time D: The Debtors' books and records reflect an amount of \$5,725.64 for 3% Back Pay E: The Debtors have no obligation for Retirement Contributions
CASSIDY, AMY KAVANA 110 BROOKSIDE PL NEW ROCHELLE, NY 10801-1806		Total Stated Claim: \$309,656.50 Total Administrative Claim: \$0.00 Total Priority Claim: \$0.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$309,656.50		Unknown, but included			\$309,650.00			Unsecured: \$0	B: The Debtors' books and records reflect 0 hours of banked vacation time E: The Debtors have no obligation for Retirement Contributions
CHAFFEY, DEANNA 1775 GILDERSLEEVE ST MERRICK, NY 11566-2503	751	Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00	Unknown, but included					\$7,892.31		Unsecured: \$0	A: The Debtors have no obligation for Sick Time F: Lag Pay has been previously satisfied
CLEMENTS, CAROL 7 EUSTIS AVE DANBURY, CT 6811		Total Stated Claim: \$10,227.75 Total Administrative Claim: \$0.00 Total Priority Claim: \$10,227.75 (Unliquidated) Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00				\$5,675.00	\$1,110.25		\$3,442.50	Unsecured: \$5,675	D: The Debtors' books and records reflect an amount of \$5,675.00 for 3% Back Pay E: The Debtors have no obligation for Retirement Contributions G: The Debtors have no obligation to provide management employee with back pay for raises given only to non-management employees
COLEMAN, PAULA 127 PATMORE AVE YONKERS, NY 10710-5427	988	Total Stated Claim: \$41,491.00 Total Administrative Claim: \$0.00 Total Priority Claim: \$1,789.62 Total Secured Amount: \$0.00 Total Unsecured Amount: \$39,701.38					\$41,491.00			Unsecured: \$0	E: The Debtors have no obligation for Retirement Contributions
COOPER, JAMES 183 BEECHWOOD AVE MT VERNON, NY 10553-1301		Total Stated Claim: Unliquidated Total Administrative Claim: \$0.00 Total Priority Claim: \$0.00 (Unliquidated) Total Secured Amount: \$0.00 (Unliquidated) Total Unsecured Amount: \$0.00					Unknown, but included			Unsecured: \$0	E: The Debtors have no obligation for Retirement Contributions

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Creditor Name	Claim #	Total Stated Claim	A - Asserted Sick Time	B - Asserted Vacation Time	C - Asserted Holiday Time	D- Asserted 3% Back Pay	E - Asserted Retirement	F- Asserted Lag	G - Asserted Other Claims	Proposed Surviving Claim	Basis for Objection
CORREIA, SILVIE 117 CLAREMONT AVE MOUNT VERNON, NY 10550-1624	903	Total Stated Claim: \$95,772.33 Total Administrative Claim: \$0.00 Total Priority Claim: \$5,199.71 Total Secured Amount: \$0.00 Total Unsecured Amount: \$90,572.62	\$27,837.08	\$9,280.08		\$7,374.15	\$49,955.29	\$1,325.73		Unsecured: \$11,236.47	A: The Debtors have no obligation for Sick Time B: The Debtors' books and records reflect 210 hours of banked vacation time totaling \$3,862.32 D: The Debtors' books and records reflect an amount of \$7,374.15 for 3% Back Pay E: The Debtors have no obligation for Retirement Contributions F: Lag Pay has been previously satisfied
COSENTINO, LAWRENCE 3212 AMPERE AVE BRONX, NY 10465-1004	766	Total Stated Claim: \$66,638.04 Total Administrative Claim: \$0.00 Total Priority Claim: \$9,405.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$57,233.04				\$16,588.04	\$47,890.56	\$2,160.00	,	Unsecured: \$12,817.50	D: The Debtors' books and records reflect an amount of \$12,817.50 for 3% Back Pay E: The Debtors have no obligation for Retirement Contributions F: Lag Pay has been previously satisfied
D'ADAMO, CARMEN 16 GUION PL NEW ROCHELLE, NY 10801-5502	978	Total Stated Claim: \$58,804.99 Total Administrative Claim: \$0.00 Total Priority Claim: \$58,804.99 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00					\$58,804.99			Unsecured: \$0	E: The Debtors have no obligation for Retirement Contributions
DADDESIO, NICK 5 PALMER LN THORNWOOD, NY 10594		Total Stated Claim: \$249,122.00 Total Administrative Claim: \$0.00 Total Priority Claim: \$249,122.00 (Unliquidated) Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00	\$82,800.00			\$26,100.00	\$136,760.00	\$3,462.00		Unsecured: \$20,561.54	A: The Debtors have no obligation for Sick Time D: The Debtors' books and records reflect an amount of \$20,561.54 for 3% Back Pay E: The Debtors have no obligation for Retirement Contributions F: Lag Pay has been previously satisfied
DE ROSE, JOSEPH 916 EDISON AVE BRONX, NY 10465-2128	893	Total Stated Claim: \$177,573.81 Total Administrative Claim: \$0.00 Total Priority Claim: \$5,525.92 Total Secured Amount: \$0.00 Total Unsecured Amount: \$172,047.89	\$51,787.89	\$13,786.11		\$13,205.90	\$98,793.91			Unsecured: \$12,817.50	A: The Debtors have no obligation for Sick Time B: The Debtors' books and records reflect 0 hours of banked vacation time D: The Debtors' books and records reflect an amount of \$12,817.50 for 3% Back Pay E: The Debtors have no obligation for Retirement Contributions
DEJULIO, ELIZABETH 26 FAIRVIEW PL NEW ROCHELLE , NY 10805	979	Total Stated Claim: \$36,053.81 Total Administrative Claim: \$0.00 Total Priority Claim: \$36,053.81 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00					\$36,053.81	,		Unsecured: \$0	E: The Debtors have no obligation for Retirement Contributions
DELIANA, DANILA MD 680 WEST BOSTON POST RD APT 3R MAMARONECK, NY 10543-3450	717	Total Stated Claim: \$5,243.32 Total Administrative Claim: \$0.00 Total Priority Claim: \$5,213.32 Total Secured Amount: \$0.00 Total Unsecured Amount: \$30.00						\$3,531.26	\$1,847.94	Unsecured: \$1,847.94	F: Lag Pay has been previously satisfied G: The Debtors do not object to the portion of the claim asserted for expense reimbursement in the amount of \$1,847.94 as a general unsecured claim
DELLA ROCCO, NORINE 443 BEACH AVE MAMARONECK, NY 10543-2707	424	Total Stated Claim: \$47,450.00 Total Administrative Claim: \$0.00 Total Priority Claim: \$47,450.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00					\$47,450.00			Unsecured: \$0	E: The Debtors have no obligation for Retirement Contributions
DIBUONO, PHILIP 49 HALCYON TER NEW ROCHELLE, NY 10801-1818	917	Total Stated Claim: \$69,741.13 Total Administrative Claim: \$0.00 Total Priority Claim: \$1,318.86 Total Secured Amount: \$0.00 Total Unsecured Amount: \$68,422.27	\$31,661.77	\$5,907.65		\$8,516.48	\$22,202.86	\$1,452.38		Unsecured: \$14,424.13	A: The Debtors have no obligation for Sick Time B: The Debtors' books and records reflect 286.64 hours of banked vacation time totaling 55,907.65 D: The Debtors' books and records reflect an amount of \$8,516.48 for 3% Back Pay E: The Debtors have no obligation for Retirement Contributions F: Lag Pay has been previously satisfied
ENG, RITA 2240 128TH ST COLLEGE POINT, NY 11356-2722		Total Stated Claim: \$48,244.00 Total Administrative Claim: \$0.00 Total Priority Claim: \$48,244.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00		\$2,384.00	\$954.00	\$9,763.00	\$29,306.00	\$2,385.00		Unsecured: \$9,763.00	B: The Debtors' books and records reflect 0 hours of banked vacation time C: The Debtors have no obligation for Holiday Time D: The Debtors do not object to the portion of the claim asserted in the amount of \$9,763.00 for 3% Back Pay E: The Debtors have no bligation for Retirement Contributions F: Lag Pay has been previously satisfied
GENNARELLI, LOUIS A MD 241 E 86TH ST APT 11C NEW YORK, NY 10028	928	Total Stated Claim: \$111,829.00 Total Administrative Claim: \$0.00 Total Priority Claim: \$111,829.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00	\$43,550.00			\$18,000.00	\$50,279.00			Unsecured: \$18,000	A: The Debtors have no obligation for Sick Time D: The Debtors do not object to the asserted amount of \$18,000.00 for 3% Back Pay E: The Debtors have no obligation for Retirement Contributions
GHERARDI-ALFREDO, ROBERTA 10 BARNES LN WEST HARRISON, NY 10604-1601	892	Total Stated Claim: \$14,829.00 Total Administrative Claim: \$0.00 Total Priority Claim: \$14,829.00 (Unliquidated) Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00	\$4,729.00				\$10,100.00			Unsecured: \$0	A: The Debtors have no obligation for Sick Time E: The Debtors have no obligation for Retirement Contributions
GIANNONI, CHERYL 88 TUCKAHOE AVE EASTCHESTER, NY 10709	909	Total Stated Claim: \$74,595.00 Total Administrative Claim: \$0.00 Total Priority Claim: \$74,595.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00	Unknown, but included				\$74,595.00			Unsecured: \$0	A: The Debtors have no obligation for Sick Time E: The Debtors have no obligation for Retirement Contributions
GLYNN, JASON 163-25 130TH AVE APT 11A JAMAICA, NY 11434-3009	977	Total Stated Claim: \$66,688.00 Total Administrative Claim: \$0.00 Total Priority Claim: \$66,688.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00	\$8,927.00	\$6,715.00	\$1,580.00	\$10,281.00	\$37,210.00	\$1,975.00		Unsecured: \$10,281	A: The Debtors have no obligation for Sick Time B: The Debtors' books and records reflect 0 hours of banked vacation time C: The Debtors have no obligation for Holiday Time D: The Debtors' books and records reflect an amount of \$10,281 for 3% Back Pay E: The Debtors have no obligation for Retirement Contributions F: Lag Pay has been previously satisfied
GRANT, GWYN 17 HARTFORD AVE GREENWICH, CT 6830	578	Total Stated Claim: \$136,205.00 Total Administrative Claim: \$0.00 Total Priority Claim: \$86,290.00 (Unliquidated) Total Secured Amount: \$0.00 Total Unsecured Amount: \$49,915.00 (Unliquidated)	\$49,915.00			\$2,624.00	\$81,586.00	\$2,080.00		Unsecured: \$2,624	A: The Debtors have no obligation for Sick Time D: The Debtors' books and records reflect an amount of \$2,624 for 3% Back Pay E: The Debtors have no obligation for Retirement Contributions F: Lag Pay has been previously satisfied

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	1						E - Asserted	I	I		
Creditor Name	Claim #	Total Stated Claim	A - Asserted Sick Time	B - Asserted Vacation Time	C - Asserted Holiday Time	D- Asserted 3% Back Pay	Retirement Contributions	F- Asserted Lag Pay	G - Asserted Other Claims	Proposed Surviving Claim	Basis for Objection
HACKER, PEARL 90 SCHOFIELD ST BRONX, NY 10464-1532	570	Total Stated Claim: \$13,082.46 Total Administrative Claim: \$0.00 Total Priority Claim: \$0.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$13,082.46				\$11,479.00		\$1,538.46	\$65.00	Unsecured: \$9,292.26	D: The Debtors' books and records reflect an amount of \$9,227.26 for 3% Back Pay F: Lag Pay has been previously satisfied G: The Debtors do not object to the remaining \$65 of the claim based on their books and records
HALL, FRANCIS X 15 SAINT JOSEPH ST NEW ROCHELLE, NY 10805-1405	725	Total Stated Claim: \$98,265.46 Total Administrative Claim: \$0.00 Total Priority Claim: \$0.00 Total Secured Amount: \$0.00 Total Unsecured Amount: Unsecured: \$98,265.46	\$32,307.66	\$12,932.04		\$3,221.00	\$49,804.76			Unsecured: \$11,908.79	A: The Debtors have no obligation for Sick Time B: The Debtors' books and records reflect 360.25 hours of banked vacation time totaling \$8,687.79 D: The Debtors' books and records reflect an amount of \$3,221 for 3% Back Pay E: The Debtors have no obligation for Retirement Contributions
HERZBERG, GILBERT Z 31 VILLA RD LARCHMONT, NY 10538-1228		Total Stated Claim: \$2,541.95 Total Administrative Claim: \$0.00 Total Priority Claim: \$0.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$2,541.95						\$2,541.95	,	Unsecured: \$0	F: Lag Pay has been previously satisfied
HOBAN, CATHERINE 34 YONKERS AVE TUCKAHOE, NY 10707-3910	908	Total Stated Claim: \$56,304.07 Total Administrative Claim: \$0.00 Total Priority Claim: \$56,304.07 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00	\$24,720.03				\$31,584.04			Unsecured: \$0	A: The Debtors have no obligation for Sick Time E: The Debtors have no obligation for Retirement Contributions
HOPPE, BOB 67 NORMA RD HARRINGTON PARK, NJ 7640		Total Stated Claim: \$31,551.21 Total Administrative Claim: \$0.00 Total Priority Claim: \$31,551.21 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00					\$31,551.21			Unsecured: \$0	E: The Debtors have no obligation for Retirement Contributions
JONES, ALAN 58 REMINGTON PL NEW ROCHELLE, NY 10801-3900	508	Total Stated Claim: \$114,699.00 Total Administrative Claim: \$0.00 Total Priority Claim: \$56,784.00 (Unliquidated) Total Secured Amount: \$0.00 Total Unsecured Amount: \$57,915.00	Unknown, but included	Unknown, but included			\$114,699.00			Unsecured: \$0	A: The Debtors have no obligation for Sick Time B: The Debtors' books and records reflect 0 hours of banked vacation time E: The Debtors have no obligation for Retirement Contributions
KAROUNOS, ROSITA 245 ELM ST NEW ROCHELLE, NY 10805-1501	896	Total Stated Claim: \$68,459.37 Total Administrative Claim: \$0.00 Total Priority Claim: \$5,850.42 Total Secured Amount: \$0.00 Total Unsecured Amount: \$62,608.95	\$25,846.20	\$3,841.02			\$44,622.57			Unsecured: \$3,842.99	A: The Debtors have no obligation for Sick Time B: The Debtors' books and records reflect 214.11 hours of banked vacation time totaling 53.842.99 E: The Debtors have no obligation for Retirement Contributions
KINGSTON, MELISSA 89 HALSTEAD AVE HARRISON, NY 10528-4161	991	Total Stated Claim: \$13,658.00 Total Administrative Claim: \$0.00 Total Priority Claim: \$1,506.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$12,152.00					\$13,233.00	\$2,613.95		Unsecured: \$0	E: The Debtors have no obligation for Retirement Contributions F: Lag Pay has been previously satisfied
KUHN, ALYSSA 300 PELHAM RD 70 NEW ROCHELLE, NY 10805		Total Stated Claim: \$38,751.93 Total Administrative Claim: \$0.00 Total Priority Claim: \$0.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$38,751.93	\$38,751.93							Unsecured: \$0	A: The Debtors have no obligation for Sick Time
KUHN, ALYSSA 300 PELHAM RD 70 NEW ROCHELLE, NY 10805	663	Total Stated Claim: \$43,579.33 Total Administrative Claim: \$0.00 Total Priority Claim: \$0.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$43,579.33 (Unliquidated)					\$43,579.33			Unsecured: \$0	E: The Debtors have no obligation for Retirement Contributions
KUHN, ALYSSA 300 PELHAM RD 7-0 NEW ROCHELLE, NY 10805		Total Stated Claim: \$9,264.07 Total Administrative Claim: \$0.00 Total Priority Claim: \$0.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$9,264.07 (Unliquidated)				\$9,264.07				Unsecured: \$9,264.07	D: The Debtors' books and records reflect an amount of \$9,264.07 for 3% Back Pay
KUHN, ALYSSA 300 PELHAM RD 7-0 NEW ROCHELLE, NY 10805	665	Total Stated Claim: \$1,428.57 Total Administrative Claim: \$0.00 Total Priority Claim: \$0.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$1,428.57		\$1,428.57						Unsecured: \$1,103.91	B: The Debtors' books and records reflect 42.5 hours of banked vacation time totltaing \$1,103.91
LAKSHMI, KAMESWARI MD 110 LOCKWOOD AVE STE 300 NEW ROCHELLE, NY 10801-5012		Total Stated Claim: \$1,730.76 Total Administrative Claim: \$0.00 Total Priority Claim: \$1,730.76 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00						\$1,730.76		Unsecured: \$0	F: Lag Pay has been previously satisfied
LEDERMAN, JEFFREY MD 211 BARNES ST OSSINING, NY 10562	716	Total Stated Claim: \$3,484.61 Total Administrative Claim: \$0.00 Total Priority Claim: \$2,884.61 Total Secured Amount: \$0.00 Total Unsecured Amount: \$600.00						\$2,884.61	\$600.00	Unsecured: \$0	F: Lag Pay has been previously satisfied G: The proof of claim lacks sufficient support for the remaining \$600 asserted in the claim
LENNON, CHRISTINA C 33 HUGUENOT ST APT 2R NEW ROCHELLE, NY 10801	932	Total Stated Claim: \$40,485.78 Total Administrative Claim: \$0.00 Total Priority Claim: \$40,485.78 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00	\$23,484.06				\$17,001.72			Unsecured: \$0	A: The Debtors have no obligation for Sick Time E: The Debtors have no obligation for Retirement Contributions
LIULIC, JOHN 93 FALMOUTH RD SCARSDALE, NY 10583-4756	953	Total Stated Claim: \$163,618.27 Total Administrative Claim: \$0.00 Total Priority Claim: \$0.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$163,618.27		\$14,230.77			\$149,387.50			Unsecured \$2,303.56	B: The Debtors' books and records reflect 135 hours of banked vacation time totaling \$2,303.56 E: The Debtors have no obligation for Retirement Contributions

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Creditor Name	Claim #	Total Stated Claim	A - Asserted Sick Time	B - Asserted Vacation Time	C - Asserted Holiday Time	D- Asserted 3% Back Pay	E - Asserted Retirement Contributions	F- Asserted Lag Pay	G - Asserted Other Claims	Proposed Surviving Claim	Basis for Objection
LONG, MANORIS 39 MANITOU TRAIL WHITE PLAINS, NY 10603	904	Total Stated Claim: \$61,995.36 Total Administrative Claim: \$0.00 Total Priority Claim: \$61,995.36 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00					\$61,995.36			Unsecured: \$0	E: The Debtors have no obligation for Retirement Contributions
MAGALDI, THOMAS 200 CAPITOL AVE WILLISTON PARK, NY 11596-1118	592	Total Stated Claim: \$162,671.00 Total Administrative Claim: \$0.00 Total Priority Claim: \$8,005.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$154,166.00	\$60,003.00	\$6,000.00		\$19,825.00	\$69,526.00	\$2,505.00	\$4,812.00	Unsecured: \$14,882.62	A: The Debtors have no obligation for Sick Time B: The Debtors' books and records reflect 0 hours of banked vacation time D: The Debtors' books and records reflect an amount of \$14,882.62 for 3% Back Pay E: The Debtors have no obligation for Retirement Contributions F: Lag Pay has been previously satisfied G: The remaining portion of the claim for a two week salary furlough lacks sufficient supporting documentation
MARCHESI, LOIS M 333 BRONX RIVER RD APT 224 YONKERS, NY 10704	935	Total Stated Claim: \$96,985.00 Total Administrative Claim: \$0.00 Total Priority Claim: \$96,985.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00	\$12,475.00				\$84,510.00			Unsecured: \$0	A: The Debtors have no obligation for Sick Time E: The Debtors have no obligation for Retirement Contributions
MC PARTLAND, ALDA-MARIE 3353 CAMPBELL DR BRONX, NY 10465-1307	943	Total Stated Claim: \$51,695.72 Total Administrative Claim: \$0.00 Total Priority Claim: \$5,289.52 Total Secured Amount: \$0.00 Total Unsecured Amount: \$46,406.20	\$28,878.39	\$3,369.14	\$721.96		\$18,726.23			Unsecured: \$0	A: The Debtors have no obligation for Sick Time B: The Debtors' books and records reflect 0 hours of banked vacation time C: The Debtors have no obligation for Holiday Time E: The Debtors have no obligation for Retirement Contributions
MERRITT, NANCIE 20 PELHAMSIDE DR NEW ROCHELLE, NY 10801-7515	609	Total Stated Claim: \$32,084.13 Total Administrative Claim: \$0.00 Total Priority Claim: \$32,084.13 (Unliquidated) Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00	\$26,398.97	\$3,635.86	\$2,049.30		Unknown, but included			Unsecured: \$0	A: The Debtors have no obligation for Sick Time B: The Debtors' books and records reflect 0 hours of banked vacation time C: The Debtors have no obligation for Holiday Time E: The Debtors have no obligation for Retirement Contributions
MERRITT, NANCIE 20 PELHAMSIDE DR NEW ROCHELLE, NY 10801-7515	610	Total Stated Claim: \$32,084.13 Total Administrative Claim: \$0.00 Total Priority Claim: \$32,084.13 (Unliquidated) Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00	\$26,398.97	\$3,635.86	\$2,049.30		Unknown, but included			Unsecured: \$0	A: The Debtors have no obligation for Sick Time B: The Debtors' books and records reflect 0 hours of banked vacation time C: The Debtors have no obligation for Holiday Time E: The Debtors have no obligation for Retirement Contributions
MICELI, CONSTANCE 1305 SHELBOURNE AVE MAMARONECK, NY 10543-3812	454	Total Stated Claim: Unliquidated Total Administrative Claim: \$0.00 Total Priority Claim: \$0.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00 (Unliquidated)	Unknown, but included	Unknown, but included						Unsecured: \$2,488.16	A: The Debtors have no obligation for Sick Time B: The Debtors' books and records reflect 131.25 hours of banked vacation time totaling \$2,488.16
O'GORMAN, ROSEMARIE 12 HAMBLETONIAN AVE CHESTER, NY 10918-1023	906	Total Stated Claim: \$28,442.00 Total Administrative Claim: \$0.00 Total Priority Claim: \$28,442.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00				Unknown, but included	\$28,442.00	Unknown, but included		Unsecured: \$11,520.22	D: The Debtors' books and records reflect an amount of \$11,520.22 for 3% Back Pay E: The Debtors have no obligation for Retirement Contributions F: Lag Pay has been previously satisfied
PETRILLO, JERILYN 314 WYNDCLIFFE RD SCARSDALE, NY 10583	925	Total Stated Claim: \$92,250.00 Total Administrative Claim: \$0.00 Total Priority Claim: \$92,250.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00	Unknown, but included				\$92,250.00			Unsecured: \$0	A: The Debtors have no obligation for Sick Time E: The Debtors have no obligation for Retirement Contributions
PETRILLO, RICHARD L MD 314 WYNDCLIFFE RD SCARSDALE, NY 10583-4831	927	Total Stated Claim: \$276,290.00 Total Administrative Claim: \$0.00 Total Priority Claim: \$276,290.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00	Unknown, but included				\$276,290.00			Unsecured: \$0	A: The Debtors have no obligation for Sick Time E: The Debtors have no obligation for Retirement Contributions
PINGITORE, PATRICIA 74 UNITY RD STAMFORD, CT 6905-3111		Total Stated Claim: \$191,581.77 Total Administrative Claim: \$0.00 Total Priority Claim: \$191,581.77 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00		\$6,382.22			\$67,353.00		\$117,846.55	Unsecured: \$3,205.64	B: The Debtors' books and records reflect 257.13 hours of banked vacation time totaling \$3,205.64 E: The Debtors have no obligation for Retirement Contributions G: The Debtor is not obligated for the remaining portion of the claim, as the employee did not retire during the eligble retirement period for grandfathered pension payments
PRESTON, LANCE 16 PINEBROOK RD NEW ROCHELLE, NY 10801-1308	916	Total Stated Claim: \$69,061.00 Total Administrative Claim: \$0.00 Total Priority Claim: \$69,061.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00					\$69,061.00			Unsecured: \$0	E: The Debtors have no obligation for Retirement Contributions
QUIGLEY, BARBARA 206 ROUTE 100 KATONAH, NY 10536-3238	704	Total Stated Claim: \$87,910.87 Total Administrative Claim: \$0.00 Total Priority Claim: \$87,910.87 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00				\$10,273.76	\$75,882.09	\$1,755.02		Unsecured: \$10,273.76	D: The Debtors' books and records reflect an amount of \$10,273.76 for 3% Back Pay E: The Debtors have no obligation for Retirement Contributions F: Lag Pay has been previously satisfied
RAHL, ANDREA 2 SUMMIT ST TARRYTOWN, NY 10591-5910	914	Total Stated Claim: \$60,816.55 Total Administrative Claim: \$0.00 Total Priority Claim: \$60,816.55 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00					\$60,816.55			Unsecured: \$0	E: The Debtors have no obligation for Retirement Contributions
REID, JACQUELINE 59 ELM ST NEW ROCHELLE, NY 10805-2402		Total Stated Claim: \$63,841.07 Total Administrative Claim: \$0.00 Total Priority Claim: \$52,148.07 Total Secured Amount: \$0.00 Total Unsecured Amount: \$11,693.00	\$18,615.36	\$1,162.50			\$32,370.29		\$11,693.00	Unsecured: \$0	A: The Debtors have no obligation for Sick Time B: The Debtors' books and records reflect 0 hours of banked vacation time E: The Debtors have no obligation for Retirement Contributions G: The claim includes \$11,963 relating to amount allegedly owed from an 1199 pension fund. The Debtors' do not adminster the fund and have no liability for this portion of the claim.

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							E - Asserted	1			
Creditor Name	Claim #	Total Stated Claim	A - Asserted Sick Time	B - Asserted Vacation Time	C - Asserted Holiday Time	D- Asserted 3% Back Pay	Retirement Contributions		G - Asserted Other Claims	Proposed Surviving Claim	Basis for Objection
REID, LORNA 15 SCHUDY PL NEW ROCHELLE, NY 10801-2405	748	Total Stated Claim: \$93,174.35 Total Administrative Claim: \$0.00 Total Priority Claim: \$93,174.35 (Unliquidated) Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00	\$15,552.21				\$77,622.14			Unsecured: \$0	A: The Debtors have no obligation for Sick Time E: The Debtors have no obligation for Retirement Contributions
REYNOLDS, FLORENCE BRANDON 81 POTTER AVE NEW ROCHELLE, NY 10801		Total Stated Claim: \$28,549.00 Total Administrative Claim: \$0.00 Total Priority Claim: \$28,549.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00					\$28,549.00			Unsecured: \$0	E: The Debtors have no obligation for Retirement Contributions
ROMANO, CLAUDIA 10-7 BRIARCLIFF DR S OSSINING, NY 10562	959	Total Stated Claim: \$14,966.59 Total Administrative Claim: \$0.00 Total Priority Claim: \$14,966.59 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00	\$10,852.73	\$2,644.62				\$1,469.24		Unsecured: \$0	A: The Debtors have no obligation for Sick Time B: The Debtors' books and records reflect 0 hours of banked vacation time F: Lag Pay has been previously satisfied
ROSEN, LINDA 68 OLD POND RD GREAT NECK, NY 11023	593	Total Stated Claim: \$13,384.62 Total Administrative Claim: \$0.00 Total Priority Claim: \$2,307.69 Total Secured Amount: \$0.00 Total Unsecured Amount: \$11,076.93	\$11,076.93					\$2,307.69		Unsecured: \$0	A: The Debtors have no obligation for Sick Time F: Lag Pay has been previously satisfied
RUIZ, RHONDA 39 HOLBROOKE RD WHITE PLAINS, NY 10605-4018	922	Total Stated Claim: \$103,830.00 Total Administrative Claim: \$0.00 Total Priority Claim: \$0.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$103,830.00					\$103,830.00			Unsecured: \$0	E: The Debtors have no obligation for Retirement Contributions
SANCHEZ, RACHEL 80 GUION PL APT 8W NEW ROCHELLE, NY 10801	986	Total Stated Claim: \$8,255.74 Total Administrative Claim: \$0.00 Total Priority Claim: \$4,922.29 Total Secured Amount: \$3,333.45 Total Unsecured Amount: \$0.00	\$6,726.90	\$3,699.22	\$1,223.07			\$1,528.84		Unsecured: \$0	A: The Debtors have no obligation for Sick Time B: The Debtors' books and records reflect 0 hours of banked vacation time C: The Debtors have no obligation for Holiday Time F: Lag Pay has been previously satisfied
SCHANZER, JEFFREY 17 WALWORTH TER WHITE PLAINS, NY 10606-2716	944	Total Stated Claim: \$120,830.87 Total Administrative Claim: \$0.00 Total Priority Claim: \$7,212.95 Total Secured Amount: \$0.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$113,708.92	\$32,359.77	\$8,661.13	\$809.72	\$8,016.03	\$69,635.89	\$1,348.33		Unsecured: \$8,009.04	A: The Debtors have no obligation for Sick Time B: The Debtors' books and records reflect 0 hours of banked vacation time C: The Debtors have no obligation for Holiday Time D: The Debtors' books and records reflect an amount of \$8,009.04 for 3% Back Pay E: The Debtors have no obligation for Retirement Contributions F: Lag Pay has been previously satisfied
SCHANZER, JEFFREY 17 WALWORTH TER WHITE PLAINS, NY 10606-2716		Total Stated Claim: \$4,756.46 Total Administrative Claim: \$0.00 Total Priority Claim: \$0.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$4,756.46		\$4,756.46						Unsecured: \$4,756.46	B: The Debtors' books and records reflect 189.75 hours of banked vacation time totaling \$4,756.46
SHAIKH, MUNIMA R MD 17 FORRESTAL WAY MAHOPAC, NY 10541	818	Total Stated Claim: \$1,730.76 Total Administrative Claim: \$0.00 Total Priority Claim: \$1,730.76 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00						\$1,730.76		Unsecured: \$0	F: Lag Pay has been previously satisfied
SHUKLA, DIPA 80 GUION PLACE APT 5W NEW ROCHELLE, NY 10801-3827	762	Total Stated Claim: \$29,602.00 Total Administrative Claim: \$0.00 Total Priority Claim: \$12,387.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$17,215.00	\$15,581.78	\$14,020.23					\$12,386.73	Unsecured: \$1,483.2	A: The Debtors have no obligation for Sick Time B: The Debtors' books and records reflect 90 hours of banked vacation time totaling \$1.483.20 G: The balance of the claim lacks sufficient supporting documentation
SIGNORE, LEANNE 123 HILDRETH PL YONKERS, NY 10704-2220	926	Total Stated Claim: \$45,952.66 Total Administrative Claim: \$0.00 Total Priority Claim: \$45,952.66 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00	\$2,787.40			\$13,437.27	\$28,370.64	\$1,357.35		Unsecured: \$8,062.61	A: The Debtors have no obligation for Sick Time D: The Debtors' books and records reflect an amount of \$8,062.61 for 3% Back Pay E: The Debtors have no obligation for Retirement Contributions F: Lag Pay has been previously satisfied
SKELTON, RHITLAN 1100 WARBURTON AVE APT 3M YONKERS, NY 10701-1044	993	Total Stated Claim: \$101,384.00 Total Administrative Claim: \$0.00 Total Priority Claim: \$15,692.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$85,692.00	\$32,692.00	\$26,808.00	\$2,615.00		\$36,000.00	\$3,269.00		Unsecured: \$0	A: The Debtors have no obligation for sick Time B: The Debtors' books and records reflect 0 hours of banked vacation time C: The Debtors have no obligation for Holiday Time E: The Debtors have no obligation for Retirement Contributions F: Lag Pay has been previously statisfied
SOTO, WILDA 1538 CROSBY AVE BRONX, NY 10461-5522	989	Total Stated Claim: \$6,981.28 Total Administrative Claim: \$0.00 Total Priority Claim: \$631.25 Total Secured Amount: \$0.00 Total Unsecured Amount: \$6,350.03					\$6,981.28			Unsecured: \$0	E: The Debtors have no obligation for Retirement Contributions
STEED, JOYCE 2242 PALMER AVE APT 3A NEW ROCHELLE, NY 10801-3032	462	Total Stated Claim: \$10,429.00 Total Administrative Claim: \$0.00 Total Priority Claim: \$10,429.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00		\$10,429.00						Unsecured: \$10,428.99	B: The Debtors' books and records reflect 383.80 hours of banked vacation time totaling \$10,428.99
STEED, JOYCE 2242 PALMER AVE APT 3A NEW ROCHELLE, NY 10801-3032	694	Total Stated Claim: \$152,679.81 Total Administrative Claim: \$0.00 Total Priority Claim: \$152,679.81 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00	\$40,995.00				\$111,684.81			Unsecured: \$0	A: The Debtors have no obligation for Sick Time E: The Debtors have no obligation for Retirement Contributions
STIER, JEFFREY 14 REUNION RD RYE BROOK, NY 10573-1085	658	Total Stated Claim: \$208,604.00 Total Administrative Claim: \$0.00 Total Priority Claim: \$208,604.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00				\$35,759.80	\$172,845.00			Unsecured: \$35,221.23	D: The Debtors' books and records reflect an amount of \$35,221.23 for 3% Back Pay E: The Debtors have no obligation for Retirement Contributions

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Creditor Name	Claim #	Total Stated Claim	A - Asserted Sick Time	B - Asserted Vacation		D- Asserted 3% Back Pay	E - Asserted Retirement	F- Asserted Lag	G - Asserted	Proposed Surviving Claim	Basis for Objection
SULLIVAN, REGINA A		Total Stated Claim: \$112,490.17 Total Administrative Claim: \$0.00		ıme	Time		Contributions	Pay	Other Claims		A: The Debtors have no obligation for Sick Time B: The Debtors' books and records reflect 657.25 hours of banked vacation time totaling \$13,010.92
463 PELHAM ROAD, BLDG. 2 NEW ROCHELLE, NY 10805	933	Total Priority Claim: \$112,240.17 Total Secured Amount: \$0.00 Total Unsecured Amount: \$250.00	\$23,080.05	\$11,229.28			\$36,136.59		\$42,044.25	Unsecured: \$13,010.92	E: The Debtors have no obligation for Retirement Contributions G: The Debtor is not obligated for the remaining portion of the claim, as the employee did not retire during the eligble retirement period for grandfathered pension payments
SUMMER, RUBY 85 WILSON DR NEW ROCHELLE, NY 10801-4601	852	Total Stated Claim: \$141,475.25 Total Administrative Claim: \$0.00 Total Priority Claim: \$141,475.25 (Unliquidated) Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00	\$29,439.30	\$5,926.80			\$36,600.00		\$69,509.15	Unsecured: \$8,446.16	A: The Debtors have no obligation for Sick Time B: The Debtors's books and records reflect 329.60 hours of banked vacation time totaling \$8,46.16 E: The Debtors have no obligation for Retirement Contributions G: The Debtor is not obligated for the remaining portion of the claim, as the employee did not retire during the eligible retirement period for grandfathered pension payments
TAMARIN, FRANK 73 WARD DR NEW ROCHELLE, NY 10804-1918	745	Total Stated Claim: \$1,127.30 Total Administrative Claim: \$0.00 Total Priority Claim: \$0.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$1,127.30						\$1,127.30		Unsecured: \$0	F: Lag Pay has been previously satisfied
TEN EYCK, ROBIN 9 BROOKSIDE AVE PELHAM, NY 10802	942	Total Stated Claim: \$106,018.15 Total Administrative Claim: \$0.00 Total Priority Claim: \$5,777.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$100,241.15	\$50,064.14			\$11,353.87	\$42,342.38	\$2,257.76		Unsecured: \$11,353.87	A: The Debtors have no obligation for Sick Time D: The Debtors do not object to the claim amount of \$11,353.87 for 3% Back Pay E: The Debtors have no obligation for Retirement Contributions F: Lag Pay has been previously satisfied
TIGHE, FIONNUALA 1145 MILE SQUARE RD YONKERS, NY 10704-1613	911	Total Stated Claim: \$24,978.00 Total Administrative Claim: \$0.00 Total Priority Claim: \$24,978.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00	\$8,238.00				\$16,740.00			Unsecured: \$0	A: The Debtors have no obligation for Sick Time E: The Debtors have no obligation for Retirement Contributions
TRUSCIO, THOMAS 459 HILLSIDE AVE PALISADES PK, NJ 7650-1346		Total Stated Claim: \$79,652.10 Total Administrative Claim: \$0.00 Total Priority Claim: \$79,652.10 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00		\$12,242.10			\$67,410.00			Unsecured: \$7,735.93	B: The Debtors' books and records reflect 332 hours of banked vacation time totaling \$7,735.93 E: The Debtors have no obligation for Retirement Contributions
TUKU, HAILESELASSIE 172 LINCOLN AVE #2 NEW ROCHELLE, NY 10801-3934	722	Total Stated Claim: \$50,944.00 Total Administrative Claim: \$0.00 Total Priority Claim: \$0.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00		Unknown, but included			\$50,944.00			Unsecured: \$11,532.36	B: The Debtors' books and records reflect 468 hours of banked vacation time totaling \$11,532.36 E: The Debtors have no obligation for Retirement Contributions
TURCHI, PETER 236 WINDING RD ISELIN, NJ 8830-2137	667	Total Stated Claim: \$38,067.94 Total Administrative Claim: \$0.00 Total Priority Claim: \$38,067.94 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00					\$38,067.94			Unsecured: \$0	E: The Debtors have no obligation for Retirement Contributions
TURCO, ANGELA CERMELE 18 CLAUDET WAY EASTCHESTER, NY 10709-1539	952	Total Stated Claim: \$115,073.50 Total Administrative Claim: \$0.00 Total Priority Claim: \$0.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$15,073.50		\$12,875.20	\$2,059.80		\$100,138.50			Unsecured: \$0	B: The Debtors' books and records reflect 0 hours of banked vacation time C: The Debtors have no obligation for Holiday Time E: The Debtors have no obligation for Retirement Contributions
TURNBULL, VERONICA 3312A FISH AVE BRONX, NY 10469-2910	994	Total Stated Claim: \$13,164.36 Total Administrative Claim: \$0.00 Total Priority Claim: \$2,136.14 Total Secured Amount: \$0.00 Total Unsecured Amount: \$11,028.22					\$13,164.36	'	,	Unsecured: \$0	E: The Debtors have no obligation for Retirement Contributions
		Total Stated Claim: \$103,532.00									A: The Debtors have no obligation for Sick Time D: The Debtors' books and records reflect an amount of \$12,515.25 for 3% Back
VALLARELLI, JAMES P 1436 TROUT BROOK DR YORKTOWN HTS, NY 10596	895	Total Administrative Claim: \$0.00 Total Priority Claim: \$103,532.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00	\$30,762.00			\$16,435.00	\$52,267.00	\$2,107.00	\$1,961.00	Unsecured: \$12,515.25	Pay E: The Debtors have no obligation for Retirement Contributions F: Lag Pay has been previously satisfied G: The remaining portion of the claim for a two week salary furlough lacks sufficient supporting documentation
VERSOZA, FRANCIS SSMCW- LAB DEPT, 205 GAINSBOROUGH RD HOLBROOK, NY 11741-2812		Total Stated Claim: \$43,680.00 Total Administrative Claim: \$0.00 Total Priority Claim: \$43,680.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00					\$43,680.00			Unsecured: \$0	E: The Debtors have no obligation for Retirement Contributions
VIOLA, JULIO 83 CUSTER AVE WILLISTON PARK, NY 11596	841	Total Stated Claim: \$16,452.00 Total Administrative Claim: \$0.00 Total Priority Claim: \$16,452.00 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00					\$16,452.00			Unsecured: \$0	E: The Debtors have no obligation for Retirement Contributions
VITARELLI, MARYANN 158 REVERE AVE BRONX, NY 10465-3323		Total Stated Claim: \$13,089.83 Total Administrative Claim: \$0.00 Total Priority Claim: \$13,089.83 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00	\$5,167.04	\$5,511.60	\$688.80			\$1,722.36		Unsecured: \$0	A: The Debtors have no obligation for Sick Time B: The Debtors' books and records reflect 0 hours of banked vacation time C: The Debtors have no obligation for Holiday Time F: Lag Pay has been previously satisfied
WILLIAMS, LINDA MD 1005 NORTH AVE NEW ROCHELLE, NY 10804-3610	742	Total Stated Claim: \$3,961.54 Total Administrative Claim: \$0.00 Total Priority Claim: \$3,961.54 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00						\$3,961.54		Unsecured: \$0	F: Lag Pay has been previously satisfied

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Creditor Name	Claim #	Total Stated Claim	A - Asserted Sick Time	B - Asserted Vacation Time	C - Asserted Holiday Time	D- Asserted 3% Back Pay	E - Asserted Retirement Contributions		G - Asserted Other Claims	Proposed Surviving Claim	Basis for Objection
WYCHE, DENISE 80 GUION PLAPT 12W NEW ROCHELLE, NY 10801-3841		Total Stated Claim: \$126,284.86 Total Administrative Claim: \$0.00 Total Priority Claim: \$12.6284.86 Total Secured Amount: \$0.00 Total Unsecured Amount: \$0.00	\$27,086.92	\$9,322.60		\$6,263.97	\$82,031.68	\$1,579.69		Unsecured: \$15,586.56	A: The Debtors have no obligation for Sick Time B: The Debtors' books and records reflect 475.73 hours of banked vacation time totaling \$9,322.59 D: The Debtors' books and records reflect an amount of \$6,263.97 for 3% Back Pay E: The Debtors have no obligation for Pension Contributions E: The Debtors have no obligation for Retirement Contributions
ZUKOWSKI, JOSEPH 394 WINDSOR AVE STRATFORD, CT 6614	985	Total Stated Claim: \$67,731.35 Total Administrative Claim: \$0.00 Total Priority Claim: \$6,439.07 Total Secured Amount: \$0.00 Total Unsecured Amount: \$61,292.28	\$18,029.42	\$1,931.72	\$321.95	\$10,562.40	\$35,276.09	\$1,609.77		Unsecured: \$9,562.03	A: The Debtors have no obligation for Sick Time B: The Debtors' books and records reflect 0 hours of banked vacation time C: The Debtors have no obligation for Holiday Time D: The Debtors' books and records reflect an amount of \$9,562.03 for 3% Back Pay E: The Debtors have no obligation for Retirement Contributions F: Lag Pay has been previously satisfied

EXHIBIT B

PROPOSED ORDER

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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

т .	
ln.	re:

SOUND SHORE MEDICAL CENTER OF WESTCHESTER, et al.

Debtors.

Chapter 11 Case No. 13-22840 (RDD)

(Jointly Administered)

ORDER GRANTING FIFTEENTH OMNIBUS OBJECTION TO CLAIMS

THIS MATTER having come before the Court upon the application of the Plan Administrator appointed in these cases (the "Fifteenth Objection") for entry of an order pursuant to 11 U.S.C. § 502 and Rule 3007 of the Federal Rules of Bankruptcy Procedure expunging. and/or disallowing each of the proofs of claim listed on Exhibit A attached hereto, on the basis that the Debtors are not liable for such claims, because such claims were previously satisfied. and/or because such claim lack sufficient support; the Court having reviewed the Fifteenth Objection; and notice having been provided (i) to the claimants listed on Exhibit A at the addresses set forth on the claimants' respective proofs of claim, (ii) counsel for the Committee. and (iii) the Office of the United States Trustee; and the Fifteenth Objection having come before the Court for a hearing held on May 18, 2016 (the "Hearing"); and upon the record made before the Court on that date; and the Court having found that the relief requested in the Fifteenth Objection is in the best interest of the Debtors' estates, creditors and other parties in interest; and it appearing that sufficient notice of the Fifteenth Objection has been given, and the Court having determined that the legal and factual basis set forth in the Fifteenth Objection establish cause for the relief granted herein; and after due deliberation and consideration of the Motion having been

¹ Unless otherwise defined, capitalized terms used herein shall have the meanings ascribed to them in the Application.

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Proposed Order

had; and it appearing that good and sufficient cause exists for granting the Fifteenth Objection, it

is hereby

ORDERED, that the relief requested in the Fifteenth Objection is GRANTED to the

extent set forth below and upon the terms and conditions set forth herein; and it is further

ORDERED, that the Claims listed on Exhibit A, as attached hereto, are hereby expunged

and disallowed, reduced, and/or reclassified to the extent set forth in Exhibit A; and it is further

ORDERED, that the Debtors' claims and noticing agent, Garden City Group, LLC., and

the Clerk of this Court are authorized to take any and all actions that are necessary or appropriate

to give effect to this Order; and it is further

ORDERED, that this Order is deemed to be a separate order with respect to each claim

covered hereby; and it is further

ORDERED, that this Court shall retain jurisdiction over any and all issues arising from

or related to the implementation and interpretation of this Order.

Dated: May ____, 2016

White Plains, New York

HONORABLE ROBERT D. DRAIN UNITED STATES BANKRUPTCY JUDGE

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Hearing Date: May 18, 2016 at 10:00 a.m. (Prevailing Eastern Time) Objection Deadline: May 11, 2016 at 4:00 p.m. (Prevailing Eastern Time)

GARFUNKEL WILD, P.C.
Counsel for the Estates and Plan Administrator
111 Great Neck Road
Great Neck, New York 11021
Phone: (516) 393-2200
Fax: (516) 466-5964
Burton S. Weston
Adam T. Berkowitz
Phillip Khezri

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

SOUND SHORE MEDICAL CENTER OF WESTCHESTER, et al¹.,

Debtors.

Chapter 11 Case

No. 13-22840 (RDD) (Jointly Administered)

THE OMNIBUS CLAIMS OBJECTION LISTED BELOW SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM. YOU ARE RECEIVING THIS NOTICE BECAUSE YOUR CLAIM IS COVERED BY THE FIFTEENTH OMNIBUS OBJECTION. YOUR FAILURE TO TIMELY OPPOSE THE RELIEF SOUGHT HEREIN MAY RESULT IN THE GRANTING OF THE RELIEF REQUESTED BY THIS OBJECTION.

NOTICE OF PLAN ADMINISTRATOR'S FIFTEENTH OMNIBUS OBJECTION TO EMPLOYEE CLAIMS FOR WHICH THE DEBTORS ARE NOT LIABLE, WHICH WERE PREVIOUSLY SATISFIED, WHICH LACK SUFFICIENT SUPPORT, AND/OR WHICH WERE INCORRECTLY CLASSIFIED

PLEASE TAKE NOTICE, that a hearing on the annexed Fifteenth Omnibus Objection

to Claims, dated April 18, 2016 (the "Fifteenth Omnibus Objection"), of the Post Confirmation

¹ The debtors in these chapter 11 cases, along with the last four digits of each debtor's federal tax identification number include: Sound Shore Health System, Inc. (1398), Sound Shore Medical Center of Westchester (0117), The Mount Vernon Hospital (0115), Howe Avenue Nursing Home, Inc., d/b/a Helen and Michael Schaffer Extended Care Center (0781), NRHMC Services Corporation (9137), The M.V.H. Corporation (1514) and New Rochelle Sound Shore Housing, LLC (0117). There are certain additional affiliates of the Debtors who are not debtors and have not sought relief under Chapter 11.

Estate of Sound Shore Medical Center of Westchester, et al. (the "Estate"), will be held before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York (the "Court"), 300 Quarropas Street, White Plains, New York, on the 18th day of May 2016 at 10:00 a.m. or as soon thereafter as counsel may be heard seeking the relief set forth on Exhibit A to the Fifteenth Omnibus Objection.

ALL PARTIES RECEIVING THIS NOTICE SHOULD REVIEW THE FIFTEENTH OMNIBUS OBJECTION CAREFULLY TO DETERMINE IF A RESPONSE IS REQUIRED. THE FAILURE TO TIMELY FILE A RESPONSE OR OTHERWISE OPPOSE THE OBJECTION MAY RESULT IN THE GRANTING OF THE RELIEF.

PLEASE TAKE FURTHER NOTICE that responses if any, to the proposed Fifteenth Omnibus Objection (the "Responses") shall be made in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules for the Southern District of New York, shall state with particularity the grounds upon with such Response is based, and shall be filed with the Bankruptcy Court, in electronic format in accordance with General Order M-399, by utilizing the Court's electronic case filing system at www.nysb.uscourts.gov, or if the same cannot be filed electronically, by manually filing same with the Clerk of the Court together with a cd-rom containing same in Word, Wordperfect or PDF format, with a hard copy provided to the Clerk's Office at the Bankruptcy Court for delivery to the Chambers of the Honorable Robert D. Drain and served on (i) Garfunkel Wild, P.C., 111 Great Neck Road, Great Neck, New York 11021, Attention: Burton S. Weston, Esq., Adam T. Berkowitz, Esq., and Phillip Khezri, Esq., counsel to the Plan Administrator; (ii) Alston & Bird LLP, 90 Park Avenue, New York, New York 10016 Attention: Martin G. Bunin, Esq. and Craig E. Freeman, Esq., counsel to the Committee;

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and (iii) the Office of the United States Trustee for this district so as to be received by all such

parties no later than 4:00 p.m. (Prevailing Eastern Time) on May 11, 2016.

PLEASE TAKE FURTHER NOTICE that if no Responses are timely filed and served

with respect to the Fifteenth Omnibus Objection, the Estate may, on or after the Objection

Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed

order annexed to the Fifteenth Omnibus Objection, which order may be entered with no further

notice or opportunity to be heard.

PLEASE TAKE FURTHER NOTICE you may obtain copies of a proof of claim from

the website maintained by the Debtors' noticing and claims agent, Garden City Group, LLC

("GCG") at http://www.geginc.com/cases/soundshore. You can search for the desired proof of

claim using the Claimant's name or the claim number. If you do not have access to the Internet,

you can request a copy of any proof of claim, pleading or service list from GCG by calling the

Sound Shore Medical Center's Information line at 866-300-1288.

PLEASE TAKE FURTHER NOTICE that the hearing on the Fifteenth Omnibus

Objection may be adjourned without further notice except as announced in open court on the

Hearing Date, or at any adjourned hearing.

Dated: Great Neck, New York

April 18, 2016

GARFUNKEL WILD, P.C.

Counsel for the Estates and Plan Administrator

Burton S. Weston

Adam T. Berkowitz

Phillip Khezri

111 Great Neck Road

Great Neck, NY 11021

(516) 393-2200

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