IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: CASA PROPERTIES LLC,[1] Debtor.	Chapter 11 Case No. 24-10697 (KBO) **Hearing Date:** **March 27, 2025 at 1:00 p.m. (ET)** **Objection Deadline:** **March 18, 2025 at 4:00 p.m. (ET)**

PLAN ADMINISTRATOR'S SIXTH OMNIBUS OBJECTION TO CLAIMS (SUBSTANTIVE)

(No Liability Claims)

THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN CLAIMS. CLAIMANTS SHOULD CAREFULLY REVIEW THIS OBJECTION AND THE SCHEDULE ATTACHED TO THE PROPOSED ORDER ATTACHED TO THIS OBJECTION TO DETERMINE WHETHER THIS OBJECTION AFFECTS THEIR CLAIMS.

The plan administrator (the "Plan Administrator") for the above-captioned debtor (the "Debtor," and collectively with certain of its affiliates prior to the Effective Date (as defined below), the "Debtors") states as follows in support of this objection (this "Objection"):

RELIEF REQUESTED

1. The Plan Administrator seeks entry of an order (the "Proposed Order"), substantially in the form attached hereto as **Exhibit A**, disallowing and expunging certain claims to which the Plan Administrator asserts that the Debtors have no liability (the "No Liability Claims" or "Disputed Claims") identified on Schedule 1 to the Proposed Order. In support of this

[1] The Debtor in this chapter 11 case, together with the last four digits of the Debtor's federal tax identification number, is Casa Properties LLC (6767). The Debtor's service address is Corporation Trust Center, 1209 Orange St., Wilmington, DE 19801.

Objection, the Plan Administrator relies on the *Declaration of Gary Broadbent in Support of Plan Administrator's Sixth Omnibus Objection to Claims (Substantive)* (the "Broadbent Declaration"), which is attached hereto as **Exhibit B**.

JURISDICTION AND VENUE

2. The United States Bankruptcy Court for the District of Delaware (the "Court") has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). The Plan Administrator confirms his consent, pursuant to rule 7008 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and rule 9013-1(f) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), to the entry of a final order by the Court in connection with this Objection to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

3. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The statutory and legal predicates for the relief sought herein are section 502 of title 11 of the United States Code (the "Bankruptcy Code"), Bankruptcy Rules 3003 and 3007, and Local Rule 3007-1.

BACKGROUND

5. On April 3, 2024 (the "Petition Date"), each of the Debtors filed a voluntary petition for relief under sections 101–1532 of the Bankruptcy Code in the Court. The Debtors continue to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. On April 16, 2024, the Office of the United

States Trustee for the District of Delaware (the "U.S. Trustee") appointed, pursuant to section 1102 of the Bankruptcy Code, an official committee of unsecured creditors [Docket No. 139] (the "Committee"). No party has requested the appointment of a trustee or examiner in these cases.

6. Additional information regarding the Debtors' businesses, capital structure, and the circumstances preceding the Petition Date is set forth in detail in the *Declaration of Edward Durkin in Support of Chapter 11 Petitions and First Day Pleadings* [Docket No. 3] and the *Declaration of Brian Whittman in Support of the Debtors' Motions to Use Cash Collateral, Approve Bidding Procedures, and Approve the Cloud/RAN Sale, and Other First Day Pleadings* [Docket No. 41], as applicable.

7. On June 3, 2024, the Debtors filed the *Third Amended Joint Plan of Liquidation of Casa Systems, Inc. and Its Debtor Affiliates* [Docket No. 399, Ex. A] (as may be amended, modified, or supplemented from time to time, the "Plan").[2] A hearing to confirm the Plan was held on June 4, 2024, and on June 5, 2024, the Court entered its *Findings of Fact, Conclusions of Law, and Order (I) Approving the Adequacy of the Disclosure Statement and (II) Confirming the Third Amended Joint Plan of Liquidation of Casa Systems, Inc. and Its Debtor Affiliates* [Docket No. 421] (the "Confirmation Order"). The Plan went effective on June 7, 2024 [Docket No. 427] (the "Effective Date").

BAR DATES

8. On April 23, 2024, the Court entered an order [Docket No. 175] (the "Bar Date Order") providing that, except as otherwise provided therein or another order of the Court, (a) all proofs of claim, including requests for payment under section 503(b)(9) of the Bankruptcy Code, must be filed so that they are actually received on or before 11:59 p.m.

[2] Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Plan.

(prevailing Eastern Time) on May 28, 2024 (the "General Bar Date"), and (b) all governmental units holding claims (whether secured, unsecured priority, or unsecured non-priority) that arose (or are deemed to have arisen) before the Petition Date, including requests for payment pursuant to section 503(b)(9) of the Bankruptcy Code, must file proofs of claim, including claims for unpaid taxes, whether such claims arise from the prepetition tax years or periods or prepetition transactions to which the Debtors were a party, and must file such proofs of claim so that they are actually received on or before 11:59 p.m. (prevailing Eastern Time) on September 30, 2024 (the "Governmental Bar Date").

9. The Bar Date Order also provides that if the Debtors amend or supplement the Schedules (as defined below) to reduce the undisputed, noncontingent, and unliquidated amount of a claim listed in the Schedules, to change the nature or classification of a claim against the Debtors reflected in the Schedules, or to add a new claim to the Schedules, the affected creditor, if it so chooses, must file proofs of claim by the later of (a) the General Bar Date or the Governmental Bar Date, as applicable, to such claim, and (b) 11:59 p.m., prevailing Eastern Time, on the date that is twenty-one (21) days from the date on which the Debtors provide notice of the amendment to the Schedules (the "Amended Schedules Bar Date").

10. The Bar Date Order further provides that unless otherwise ordered, all entities asserting claims arising from the rejection of executory contracts and unexpired leases of the Debtors shall file a proof of claim on account of such rejection by the later of (a) the General Bar Date, and (b) 11:59 p.m., prevailing Eastern Time, on the date that is thirty (30) days after the later of (i) entry of an order approving the rejection of any executory contract or unexpired lease of the Debtors, and (ii) the effective date of a rejection of any executory contract or unexpired lease of the Debtors pursuant to operation of any Court order (the "Rejection Damages Bar Date," and

collectively with the General Bar Date, the Governmental Bar Date, and the Amended Schedules Bar Date, the "Claims Bar Dates").

SCHEDULES, PROOFS OF CLAIM, AND CLAIMS RECONCILIATION

11. Each Debtor filed its Schedules of Assets and Liabilities and Statement of Financial Affairs [Docket Nos. 163, 164, 165, 166 & 167] (collectively, the "Schedules"), as may have been amended from time to time, at various times throughout these chapter 11 cases.

12. The Debtors' register of claims (the "Claims Register"), maintained by Epiq Corporate Restructuring, LLC ("Epiq"), indicates that approximately 133 proofs of claim and certain claims scheduled by the Debtors on their Schedules (each, a "Claim," and collectively, the "Claims") have been filed or scheduled in these chapter 11 cases alleging Claims against the Debtors.

13. In the ordinary course of business, the Debtors maintain books and records (the "Books and Records") that reflect, among other things, the nature and amount of the liabilities owed to their creditors. The Plan Administrator, the Debtors, and their professionals continue to review, compare, and reconcile the Claims (including any supporting documentation) with the Schedules and Books and Records. This reconciliation process includes identifying particular categories of Claims that may be subject to objection. While this analysis and reconciliation is ongoing, the Plan Administrator has determined that the Disputed Claims should be disallowed and expunged for one or more reasons described below.

A. No Liability Claims

14. After reconciling each of the No Liability Claims against the Books and Records, the Plan Administrator has determined that the Debtors are not liable with respect to the No Liability Claims for the reasons set forth on Schedule 1 to the Proposed Order. Any failure to disallow and expunge the No Liability Claims will result in the applicable claimants potentially

receiving an unwarranted recovery against the Debtors' estates, to the detriment of creditors in these chapter 11 cases.

15. Accordingly, the Plan Administrator objects to the No Liability Claims and requests entry of the Proposed Order disallowing and expunging each of the No Liability Claims as set forth on Schedule 1.

BASIS FOR RELIEF REQUESTED

16. Section 502(a) of the Bankruptcy Code provides, in pertinent part, that "[a] claim or interest, proof of which is filed under section 501 of this title, is deemed allowed, unless a party in interest . . . objects." 11 U.S.C. § 502(a). Once an objection to a claim is filed, the Court, after notice and a hearing, shall determine the allowed amount of the claim. *See* 11 U.S.C. § 502(b).

17. Section 502(b)(1) of the Bankruptcy Code provides, in part, that a claim may not be allowed to the extent that it "is unenforceable against the debtor and property of the debtor, under any agreement or applicable law." 11 U.S.C. § 502(b)(1). While a properly filed proof of claim is *prima facie* evidence of the claim's allowed amount, when an objecting party rebuts a claim's *prima facie* validity, the claimant bears the burden of proving the claim's validity by a preponderance of evidence. *See In re Allegheny Int'l, Inc.*, 954 F.2d 167, 173-74 (3d Cir. 1992). The burden of persuasion with respect to the claim is always on the claimant. *See id*. at 174. Pursuant to Bankruptcy Rule 3007(d), a debtor is permitted to file omnibus objections to more than one claim on the bases enumerated therein, which include, among other things, that such claims "[do] not comply with applicable rules, and the objection states that the objector is unable to determine the validity of the claim because of the noncompliance." Fed. R. Bankr. P. 3007(d)(6).

18. However, a claimant asserting administrative expense priority bears the burden of establishing entitlement to such priority. *See, e.g.*, *In re Bernard Techs., Inc.*, 342 B.R. 174, 177

(Bankr. D. Del. 2006); *In re O'Brien Envtl. Energy, Inc.*, 181 F.3d 527, 533 (3d Cir. 1999); *In re Goody's Family Clothing Inc.*, 610 F.3d 812, 818 (3d Cir. 2010); *In re Interstate Grocery Distribs. Sys.*, 2001 Bankr. LEXIS 1240, at *17 (Bankr. D.N.J. Oct. 4, 2001) (citing *In re Drexel Burnham Lambert Group, Inc.*, 134 B.R. 482 (Bankr. S.D.N.Y. 1991)) ("The burden of proving entitlement to an administrative expense claim is on the claimant and the measure of proof is preponderance of the evidence."). Section 503(b)(1)(A) of the Bankruptcy Code grants administrative priority to claims for, among other enumerated categories of estate expenses, "the actual, necessary costs and expenses of preserving the estate." 11 U.S.C. § 503(b)(1)(A). The Third Circuit utilizes a two-part test to determine whether a claim is entitled to administrative expense priority. "For a claim in its entirety to be entitled to . . . priority under § 503(b)(1)(A), the debt must arise from a transaction with the debtor-in-possession and the consideration supporting the claimant's right to payment must be beneficial to the debtor-in-possession in the operation of the business." *In re O'Brien Envtl. Energy, Inc.*, 181 F.3d at 532-33.

19. Claimants bear a similar burden for claims under section 503(b)(9) of the Bankruptcy Code. To establish entitlement to a section 503(b)(9) claim, a claimant must prove by a preponderance of the evidence that "(1) the vendor sold 'goods' to the debtor; (2) the goods were received by the debtor within twenty days [before the bankruptcy] filing; and (3) the goods were sold . . . in the ordinary course of business." *In re World Imports, Ltd.*, 862 F.3d 338, 341 (3d Cir. 2017) (quoting *In re Goody's Fam. Clothing, Inc.*, 401 B.R. 131, 133 (Bankr. D. Del. 2009)). Section 503(b)(9) of the Bankruptcy Code grants an administrative priority claim for "the value of any goods received by the debtor within 20 days before the date of commencement of a case under this title in which the goods have been sold to the debtor in the ordinary course of such debtor's business." 11 U.S.C. § 503(b)(9).

20. The Disputed Claims are unenforceable against the Debtors for the reasons set forth above and on Schedule 1 attached hereto. Therefore, pursuant to section 502(b)(1) of the Bankruptcy Code, Bankruptcy Rule 3007, and Local Rule 3007-1, the Plan Administrator respectfully requests that the Court enter the Proposed Order granting the relief requested herein.

RESPONSES TO OBJECTION

21. Filing and Service of Responses: To contest this Objection, a claimant must file and serve a written response to this Objection (a "Response") so that it is actually received by the Clerk of the Court and the parties in the following paragraph no later than 4:00 p.m. (ET) on March 18, 2025 (the "Response Deadline"). Claimants should locate their names and Claims on Schedule 1 to the Proposed Order, and carefully review this Objection. A Response must address each ground upon which the Plan Administrator objects to a particular Claim. A hearing to consider this Objection will be held on March 27, 2025, at 1:00 p.m. (ET), before the Honorable Karen B. Owens, United States Bankruptcy Judge, at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 6th Floor, Courtroom No. 3, Wilmington, Delaware 19801 (the "Hearing").

22. Each Response must be filed and served upon the following entities at the following addresses: (a) the Office of the Clerk of the Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801; (b) Sidley Austin LLP, 787 Seventh Avenue, New York, NY, 10019, Attn: Patrick Venter; (c) Sidley Austin LLP, One South Dearborn, Chicago, IL 60603, Attn: Ryan L. Fink; and (d) Young Conaway Stargatt & Taylor, LLP, 1000 N. King St., Wilmington, DE 19801, Attn: Joseph M. Mulvihill and Timothy R. Powell.

23. Content of Responses: Every Response to this Objection must contain, at a minimum, the following:

a. a caption setting forth the name of the Court, the above-referenced case number, and the title of this Objection to which the Response is directed;

b. the name of the claimant and description of the basis for the amount of the Disputed Claim;

c. a concise statement setting forth the reasons why a particular Disputed Claim should not be disallowed for the reasons set forth in this Objection, including, but not limited to, the specific factual and legal bases upon which the claimant will rely in opposing this Objection at the Hearing;

d. all documentation or other evidence of the Claim in question, to the extent not already included with the claimant's proof of claim, upon which the claimant will rely in opposing this Objection at the Hearing;

e. the name, address, telephone number, and fax number of the person(s) (who may be the claimant or a legal representative thereof) possessing ultimate authority to reconcile, settle, or otherwise resolve the Claim on behalf of the claimant; and

f. the name, address, telephone number, and fax number of the person(s) (who may be the claimant or a legal representative thereof) to whom the Plan Administrator should serve any reply to the Response.

24. Timely Response Required; Hearing; Replies: If a Response is properly and timely filed and served in accordance with the above procedures, the Plan Administrator will endeavor to reach a consensual resolution with the claimant. If no consensual resolution is reached, the Court will conduct the Hearing with respect to this Objection and the Response(s) on March 27, 2025, at 1:00 p.m. (ET), or such other date and time as parties filing Responses may be notified. Only those Responses made in writing and timely filed and received will be considered by the Court at any such hearing.

25. Adjournment of Hearing: The Plan Administrator reserves the right to adjourn the Hearing on any Claim included in this Objection. In the event that the Plan Administrator so adjourns the Hearing, he will state that the Hearing on that particular Claim has been adjourned on

the agenda for the Hearing on this Objection, which agenda will be served on the person designated by the claimant in its Response.

26. If a claimant whose Claim is subject to this Objection, and who is served with this Objection, fails to file and serve a timely Response in compliance with the foregoing procedures, the Plan Administrator will present to the Court an appropriate order disallowing the Disputed Claim without further notice to the claimant.

27. Separate Contested Matter: Each of the Disputed Claims and the Plan Administrator's objections thereto as asserted in this Objection constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. The Plan Administrator requests that any order entered by the Court with respect to an objection asserted herein will be deemed a separate order with respect to each such Disputed Claim.

RESERVATION OF RIGHTS

28. The Plan Administrator expressly reserves the right to amend, modify, or supplement this Objection, and to file additional objections to any other Claims (filed or not) that may be asserted against the Debtors and their estates. Should one or more of the grounds of objection stated in this Objection be dismissed or overruled, the Plan Administrator reserves the right to object to each of the Disputed Claims or any other proofs of claim on any other grounds that the Plan Administrator discovers or elects to pursue.

29. Notwithstanding anything contained in this Objection, or the exhibits and schedule attached hereto, nothing herein will be construed as a waiver of any rights that the Plan Administrator, the Debtors, or any successor to the Plan Administrator or the Debtors, may have to enforce rights of setoff against the claimants.

30. Nothing in this Objection will be deemed or construed: (a) as an admission as to the validity of any claim or interest against the Debtors; (b) as a waiver of the Plan Administrator's or the Debtors' rights to dispute or otherwise object to any claim or proof of interest on any grounds or basis; (c) to waive or release any right, claim, defense, or counterclaim of the Plan Administrator or the Debtors, or to estop the Plan Administrator or the Debtors from asserting any right, claim, defense, or counterclaim; (d) as an approval or assumption of any agreement, contract, or lease, pursuant to section 365 of the Bankruptcy Code; or (e) as an admission that any obligation is entitled to administrative expense priority or any such contract or agreement is executory or unexpired for purposes of section 365 of the Bankruptcy Code or otherwise.

COMPLIANCE WITH LOCAL BANKRUPTCY RULE 3007-1

31. The undersigned representative of the Plan Administrator has reviewed the requirements of Local Rule 3007-1 and certifies that this Objection substantially complies with that Local Rule. To the extent that this Objection does not comply in all respects with the requirements of Local Rule 3007-1, the Plan Administrator believes such deviations are not material and respectfully request that any such requirement be waived.

FURTHER INFORMATION

32. Questions about or requests for additional information about the proposed disposition of the Disputed Claims hereunder should be directed to the Plan Administrator's counsel in writing at the following addresses: (a) Young Conaway Stargatt & Taylor, LLP, 1000 N. King St., Wilmington, DE 19801, Attn: Joseph M. Mulvihill and Timothy R. Powell (emails: jmulvihill@ycst.com and tpowell@ycst.com); (b) Sidley Austin LLP, 787 Seventh Avenue, New York, NY, 10019, Attn: Patrick Venter (email: pventer@sidley.com); and (c) Sidley Austin LLP, One South Dearborn, Chicago, IL 60603, Attn: Ryan L. Fink (email: ryan.fink@sidley.com).

NOTICE

33. Notice of this Objection has been provided to: (a) the U.S. Trustee; (b) the holders of the Disputed Claims; and (c) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Plan Administrator submits that, in light of the nature of the relief requested, no other or further notice need be given.

WHEREFORE the Plan Administrator respectfully requests entry of the Proposed Order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and such other relief as the Court deems appropriate under the circumstances.

Dated: February 25, 2025
Wilmington, Delaware

/s/ Timothy R. Powell
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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
CASA PROPERTIES LLC,[1]	Case No. 24-10697 (KBO)
Debtor.	**Hearing Date:** **March 27, 2025 at 1:00 p.m. (ET)**
	Objection Deadline: **March 18, 2025 at 4:00 p.m. (ET)**

NOTICE OF PLAN ADMINISTRATOR'S SIXTH OMNIBUS OBJECTION TO CLAIMS (SUBSTANTIVE)

PARTIES RECEIVING THIS NOTICE SHOULD LOCATE THEIR NAMES AND THEIR DISPUTED CLAIMS IDENTIFIED ON THE SCHEDULE ATTACHED TO THE PROPOSED ORDER.

PLEASE TAKE NOTICE that the Plan Administrator for the above-captioned Debtor (the "Debtor," and collectively with certain of its affiliates prior to the Effective Date (as defined in the Objection), the "Debtors") has filed the attached *Plan Administrator's Sixth Omnibus Objection to Claims (Substantive)* (the "Objection").[2]

PLEASE TAKE FURTHER NOTICE that any responses (each, a "Response") to the relief requested in the Objection must be filed on or before **March 18, 2025 at 4:00 p.m. (prevailing Eastern Time)** (the "Response Deadline") with the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801 and served upon the undersigned counsel to the Plan Administrator.

PLEASE TAKE FURTHER NOTICE that any Response must contain, at a minimum, the following:

a. a caption setting forth the name of the Court, the above-referenced case number, and the title of the Objection to which the Response is directed;

b. the name of the claimant submitting the response (the "Respondent") and a description of the basis for the amount and classification asserted in the disputed claim, if applicable;

[1] The Debtor in this chapter 11 case, together with the last four digits of the Debtor's federal tax identification number, is Casa Properties LLC (6767). The Debtor's service address is Corporation Trust Center, 1209 Orange St., Wilmington, DE 19801.

[2] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Objection.

c. a concise statement setting forth the reasons why the particular disputed claim should not be disallowed, reclassified, or otherwise modified for the reasons set forth in the Objection, including, but not limited to, the specific factual and legal bases upon which the Respondent will rely in opposing the Objection at any hearing thereon;

d. all documentation or other evidence of the particular disputed claim or asserted amount and classification thereof, to the extent not already included with the proof of claim previously filed, upon which the Respondent will rely in opposing the Objection at any hearing thereon; and

e. the name, address, telephone number, and email address of the person(s) (who may be the Respondent or a legal representative thereof) (i) possessing ultimate authority to reconcile, settle or otherwise resolve the disputed claim on behalf of the Respondent, and (ii) to whom the Plan Administrator should serve any reply to the Response.

PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE OBJECTION WILL BE HELD ON **MARCH 27, 2025 AT 1:00 P.M. (ET)** BEFORE THE HONORABLE KAREN B. OWENS IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 6TH FLOOR, COURTROOM NO. 3, WILMINGTON, DELAWARE 19801.

PLEASE TAKE FURTHER NOTICE THAT IF YOU ARE A CLAIMANT AND FAIL TO TIMELY FILE AND SERVE A RESPONSE IN ACCORDANCE WITH THE ABOVE REQUIREMENTS, YOU WILL BE DEEMED TO HAVE CONCURRED WITH AND CONSENTED TO THE OBJECTION AND THE RELIEF REQUESTED THEREIN, AND THE COUNSEL TO THE PLAN ADMINISTRATOR WILL PRESENT TO THE COURT, WITHOUT FURTHER NOTICE TO YOU, THE PROPOSED ORDER SUSTAINING THE OBJECTION.

PLEASE TAKE FURTHER NOTICE THAT QUESTIONS CONCERNING THE OBJECTION SHOULD BE DIRECTED TO THE UNDERSIGNED COUNSEL FOR THE PLAN ADMINISTRATOR. CLAIMANTS SHOULD NOT CONTACT THE CLERK OF THE COURT TO DISCUSS THE MERITS OF THEIR DISPUTED CLAIMS OR THE OBJECTION.

[*Signature Page Follows*]

Dated: February 25, 2025
Wilmington, Delaware

/s/ Timothy R. Powell

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Counsel to the Plan Administrator

EXHIBIT A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
CASA PROPERTIES LLC,[1]	Case No. 24-10697 (KBO)
Debtor.	**Ref. Docket No. ___**

ORDER SUSTAINING PLAN ADMINISTRATOR'S SIXTH OMNIBUS OBJECTION TO CLAIMS (SUBSTANTIVE)

Upon the objection (the "Objection")[2] of the plan administrator (the "Plan Administrator") for the above-captioned debtor (the "Debtor," and collectively with certain of its affiliates prior to the Effective Date, the "Debtors") for entry of an order (this "Order") disallowing and expunging the Disputed Claims set forth on **Schedule 1** attached hereto, all as more fully set forth in the Objection; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of this proceeding and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and appropriate notice of and opportunity for a hearing on the Objection having been given; and the relief requested in the Objection being in the best interests of the Debtors' estates, their creditors, and other parties in interest; and this Court having reviewed the Objection and having heard the statements in support of the relief requested therein

[1] The Debtor in this chapter 11 case, together with the last four digits of the Debtor's federal tax identification number, is Casa Properties LLC (6767). The Debtor's service address is Corporation Trust Center, 1209 Orange St., Wilmington, DE 19801.

[2] Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Objection.

at a hearing before this Court, if any (the "Hearing"); and this Court having determined that the legal and factual bases set forth in the Objection and at the Hearing establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.

2. Any Response to the Objection not otherwise withdrawn, resolved, or adjourned is hereby overruled on its merits.

3. The No Liability Claims identified on **Schedule 1** are disallowed and expunged in their entirety.

4. This Order shall be deemed a separate order with respect to each of the Disputed Claims identified on **Schedule 1** attached hereto. Any stay of this Order pending appeal by any of the claimants whose Disputed Claim(s) are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

5. The Plan Administrator and Epiq are authorized to take all actions necessary and appropriate to give effect to this Order.

6. Epiq is authorized to modify the Claims Register to comport with the relief granted by this Order.

7. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Plan Administrator or the Debtors may have to enforce rights of setoff against the claimants.

8. Nothing in the Objection or this Order shall be deemed or construed: (a) as an admission as to the validity of any claim against the Debtors; (b) as a waiver of the Plan

Administrator's or the Debtors' rights to dispute or otherwise object to any claim on any grounds or basis; (c) to waive or release any right, claim, defense, or counterclaim of the Plan Administrator or the Debtors, or to estop the Plan Administrator or the Debtors from asserting any right, claim, defense, or counterclaim; (d) as an approval or assumption of any agreement, contract, or lease, pursuant to section 365 of the Bankruptcy Code; or (e) as an admission that any obligation is entitled to administrative expense priority or any such contract or agreement is executory or unexpired for purposes of section 365 of the Bankruptcy Code or otherwise.

9. The terms and conditions of this Order shall be immediately enforceable and effective upon its entry.

10. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

SCHEDULE 1

No Liability Claims

Casa Properties LLC - Case No. 24-10697 (KBO)
Schedule 1 - No Liability Claims

No.	Name of Claimant	Filed Date	Claim Number	Claim Type	Claim Amount	Reason for Modification
1.	Bank of America, N.A. 1270 Avenue of the Americas, 30th Floor New York, NY 10020	5/24/2024	10067	Secured	$ 724,525.97	The Debtors' Books and Records reflect that the underlying Letters of Credit have been exhausted, and therefore, no liability is owed. The Claim should be disallowed and expunged in its entirety.
2.	Charter Communications Operating, LLC 488 Madison Avenue New York, NY 10022	5/28/2024	10085	Unsecured	$ 15,800,000.00	The Debtors’ Books and Records reflect no liability owed. The Claim should be disallowed and expunged in its entirety.
3.	P4 sp. z o.o. ul. Wynalazek 1 Warszaw, Poland 02-677	7/5/2024	10099*	Unsecured	$ 210,000.00	The Debtors’ Books and Records reflect no liability owed. The Claim should be disallowed and expunged in its entirety.

** Claim No. 10099 of P4 sp. z o.o. is also included on Schedule 1 attached to the Debtors' Fifth Omnibus Objection to Claims (Non-Substantive), which was filed contemporaneously herewith.*

EXHIBIT B

Broadbent Declaration

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
CASA PROPERTIES LLC,[1]	Case No. 24-10697 (KBO)
Debtor.	

DECLARATION OF GARY BROADBENT IN SUPPORT OF PLAN ADMINISTRATOR'S SIXTH OMNIBUS OBJECTION TO CLAIMS (NON-SUBSTANTIVE)

Pursuant to 28 U.S.C. § 1746, I, Gary Broadbent, hereby declare under penalty of perjury that the following is true and correct to the best of my knowledge and belief:

1. I am the President at Broadbent Advisors LLC. As a result of my position, I am familiar with the Debtors' day-to-day business operations and affairs, the Books and Records, and the Debtors' chapter 11 efforts.

2. I submit this declaration (this "Declaration") in support of the *Plan Administrator's Sixth Omnibus Objection to Claims (Non-Substantive)* (the "Objection").[2]

3. I have reviewed the Objection and am directly, or by and through other personnel or representatives of the Debtors, reasonably familiar with the information contained therein, the Proposed Order, and the schedule attached to the Proposed Order. I am executing this Declaration on behalf of the Debtors.

4. Considerable resources and time have been expanded in reviewing and reconciling the proofs of claim filed or pending against the Debtors and their estates in these chapter 11 cases.

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[1] The Debtor in this chapter 11 case, together with the last four digits of the Debtor's federal tax identification number, is Casa Properties LLC (6767). The Debtor's service address is Corporation Trust Center, 1209 Orange St., Wilmington, DE 19801.

[2] All capitalized terms used and not otherwise defined herein have the meanings ascribed to them in the Objection.

5. In preparing this Declaration, I reviewed the Claims Register maintained by Epiq, which contains the record of all parties that filed proofs of claim in connection with these chapter 11 cases. Additionally, I or other representatives of the Debtors (a) reviewed (i) the Claims Register, by which we identified Claims that should be disallowed and expunged, and (ii) the Books and Records with respect to the Claims described in the Objection, (b) conferred with the Debtors' representatives and outside counsel having knowledge relevant to understanding the validity of the Claims, (c) approved the inclusion of the Claims in the Objection, and (d) reviewed the Objection and the Proposed Order. Accordingly, I am familiar with the information contained therein and in Schedule 1 to the Proposed Order.

6. Except as otherwise indicated, all facts set forth in this Declaration are based on my personal knowledge of the Debtors' operations, finances, and Books and Records, my review of the proofs of claim and Claims Register, or information received from other members of the Debtors, or the Debtors' other advisors. If called upon to testify, I would testify competently to the facts set forth herein.

A. No Liability Claims

7. I, along with other representatives of the Debtors, have reviewed the Books and Records and determined that the Debtors and their estates are not liable on account of the No Liability Claims. Accordingly, to prevent the applicable claimants from potentially receiving an unwarranted recovery, to the detriment of creditors in these chapter 11 cases, I seek to disallow and expunge the No Liability Claims in their entirety for the reasons set forth on Schedule 1 to the Proposed Order.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on February 25, 2025

/s/ Gary Broadbent
Gary Broadbent
Broadbent Advisors LLC

Plan Administrator to the Debtors