

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

	X	
	:	
In re:	:	Chapter 11
	:	
Velti Inc., <i>et al.</i> , <sup>1</sup>	:	Case No. 13-12878 (PJW)
	:	
	:	(Jointly Administered)
Debtors.	:	
	:	Hearing Date: 5/29/14 at 9:30 a.m. (EDT)
	:	Objection Deadline: 5/22/14 at 4:00 p.m. (EDT)
	X	

**NOTICE OF OBJECTION**

TO: (A) THE CLAIMANTS LIST ON EXHIBIT B TO THE OBJECTION; (B) THE UNITED STATES TRUSTEE FOR THE DISTRICT OF DELAWARE AND (C) THOSE PARTIES REQUESTING NOTICE PURSUANT TO BANKRUPTCY RULE 2002.

**PLEASE TAKE NOTICE** that on April 28, 2014, Velti Inc. and certain of its affiliates (collectively, the “Debtors”), filed the **First Omnibus (Non-Substantive) Objection to Claims** (the “Objection”) with the United States Bankruptcy Court for the District of Delaware.

**PLEASE TAKE FURTHER NOTICE** that responses to the Objection, if any, must be filed on or before **May 22, 2013 at 4:00 p.m.** (the “**Objection Deadline**”) with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801; and served upon the undersigned counsel to the Debtors so that the response is received on or before the Objection Deadline.

---

<sup>1</sup> The Debtors are the following six entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): Velti Inc. (4475), Air2Web, Inc. (5572), Air2Web Interactive, Inc. (2364), Velti North America, Inc. (8900), Velti North America Holdings, Inc. (3953) and Velti US Holdings, Inc. (8299). The mailing address of each of the Debtors, solely for purposes of notices and communications, is 201 California Street, 14<sup>th</sup> Floor, San Francisco, California 94111.

**PLEASE TAKE FURTHER NOTICE** that responses to the Objection **MUST**, at a minimum, contain the following:

- a. a caption setting forth the name of the Bankruptcy Court, the above-referenced case number and the title of the Objection to which the Response is directed; the name of the claimant and description of the basis for the amount of the claim;
- b. a concise statement setting forth the reasons why a particular claim should not be disallowed for the reasons set forth in the Objection, including, but not limited to, the specific factual and legal bases upon which the claimant will rely in opposing the Objection at the Hearing;
- c. 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 the Objection at the Hearing;
- d. 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
- e. 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 Debtors should serve any reply to the Response.

**PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE OBJECTION WILL BE HELD ON MAY 29, 2013 AT 9:30 A.M., BEFORE THE HONORABLE PETER J. WALSH, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, SIXTH FLOOR, COURTROOM NO. 2, WILMINGTON, DELAWARE 19801.**

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

**PLEASE TAKE FURTHER NOTICE THAT, IF YOU ARE A CLAIMANT, READ THE OBJECTION CAREFULLY. YOUR CLAIMS MAY BE REDUCED, MODIFIED, OR DISALLOWED AS A RESULT OF THE OBJECTION. IF YOU 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 DEBTORS WILL PRESENT TO THE COURT, WITHOUT FURTHER NOTICE TO YOU, AN APPROPRIATE ORDER SUSTAINING THE OBJECTION.**

Dated: April 28, 2014  
Wilmington, Delaware

Respectfully submitted,

/s/ Stuart M. Brown  
Stuart M. Brown (DE 4050)  
DLA PIPER LLP (US)  
1201 North Market Street, Suite 2100  
Wilmington, Delaware 19801  
Telephone: (302) 468-5700  
Facsimile: (302) 394-2341  
Email: stuart.brown@dlapiper.com

-and-

Richard A. Chesley (IL 6240877)  
Matthew M. Murphy (IL 6257958)  
Chun I. Jang (DE 4790)  
DLA PIPER LLP (US)  
203 N. LaSalle Street, Suite 1900  
Chicago, Illinois 60601  
Telephone: (312) 368-4000  
Facsimile: (312) 236-7516  
Email: richard.chesley@dlapiper.com  
matt.murphy@dlapiper.com  
chun.jang@dlapiper.com

ATTORNEYS FOR DEBTORS AND DEBTORS IN  
POSSESSION