

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF SOUTH CAROLINA

IN RE:) Chapter 11
) Case Number 12-01220-jw
CCHG Liquidation Co.,) Reply to Objection to Allowance
) of Claim Numbers 1207, 1208, 1209,
Debtor.) 1210, 1211, 1212, 1213, 1214, 1215 and
_____) 1216 filed by Freeman Gas

Freeman Gas, by and through its undersigned counsel hereby Replies to the Objection filed by the Debtor it's the proof of claims filed by Freeman Gas and as appear in the registry of the court as Proof of Claim Number 1207, 1208, 1209, 1210, 1211, 1212, 1213, 1214, 1215, and 1216.

The Debtor's objections has two grounds for it objection: (1) the proof of claims filed by Freeman Gas total an amount greater than the alleged books and records of the consolidated Debtors which suggest that the amount owed is \$46,086.08 and (2) the Debtors are entitled to an offset for money paid against these claims in the amount of \$7,879.33. As for the second grounds, Freeman Gas is in agreement that the Debtor is entitled to an offset in the amount of \$7,879.33 for the amount paid. However, Freeman Gas supported its claims with itemized statements providing the respective invoice number, the quantity delivered, the location delivered and the amount of the charge for each delivery that had not been paid. The Debtor's objection fails to contest any amount on even a single invoice and fails to contest even a single invoice. Without providing any indication of what the Debtor's records might actually be, the mere allegation that the Debtor's records provide for a different amount is an insufficient ground for objecting to a proof of claim.

Attached hereto is a copy of the Proof of Claims as filed by Freeman Gas. The total of these claims is as follows:

Claim Number:	Amount
1207	\$ 3,503.31
1208	\$ 30,842.56
1209	\$ 1,749.65
1210	\$ 196.80
1211	\$ 14,898.04
1212	\$ 189.16
1213	\$ 10,901.16
1214	\$ 3,285.49
1215	\$ 394.14
Total	\$ 65,960.31

Thus, with the offset of \$7,879.33, the total amount still due and owing is \$58,080.98.

Wherefore, Freeman Gas stands by its proof of claims, stands ready to submit each and every invoice into the record and stands ready to prove the amount of its claim against the Debtor. Therefore, Freeman Gas respectfully requests that the court overrule the objection of the Debtor, allow an offset to the amount of the claim and find the total amount of Freeman Gas's claims is deemed to be \$58,080.98.

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April 30, 2013