## UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF COLUMBIA

In re: : Chapter 11

GREATER SOUTHEAST COMMUNITY HOSPITAL CORP., I, et al.,

Jointly Administered Case No. 02-2250 Judge S. Martin Teel, Jr.

Debtors.

THE DCHC LIQUIDATING TRUST'S SUPPLEMENT TO ITS TWENTIETH OMNIBUS OBJECTION TO CLAIMS PURSUANT TO 11 U.S.C. § 502 AND FED. R. BANKR. P. 3007: SUPERSEDED AND INSUFFICIENT DOCUMENTATION CLAIMS

## TO THE HONORABLE S. MARTIN TEEL, JR. UNITED STATES BANKRUPTCY JUDGE:

The DCHC Liquidating Trust (the "<u>Trust</u>"), by and through its undersigned counsel, and pursuant to the Court's "Order to Supplement Twentieth Omnibus Objection to Claims" (the "<u>Order to Supplement</u>") entered on September 9, 2008, hereby files a Supplement to the Trust's Twentieth Omnibus Objection, originally filed on August 19, 2008 (D.E. 3420), and states as follows:

- 1. The Order to Supplement requires the Trust to (1) clarify footnote (B) to Exhibit A to the Twentieth Omnibus Objection and (2) submit to the Court the proofs of claims that are listed in Exhibit B to the Twentieth Omnibus Objection.
- 2. Regarding the first issue, footnote (B) should not have been included in <u>Exhibit A</u>. Specifically, with respect to claimant George Danial Do ("<u>Danial Do</u>"), <u>Exhibit A</u> to the Twentieth Omnibus Objection seeks to expunge Claim No. 1102 because it has been superseded by Danial Do's Claim No. 1632. Exhibit A includes a footnote (B), which states that Claim No.

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1632 was to be reduced from \$107,190.00 to \$48,865.00 pursuant to the Trust's Nineteenth Omnibus Objection. This was a mistake. Exhibit A to the Twentieth Omnibus Objection should have stated that Danial Do's Claim No. 1102 for \$40,275.00 has been superseded by his Claim No. 1632 for \$107,190.00 (as opposed to \$40,865.00).

3. Regarding the second issue, the Trust hand delivered a copy of the proofs of claims that are listed on Exhibit B to the Twentieth Omnibus Objection to the Court today, September 10, 2008.

Dated: September 10, 2008 Respectfully submitted,

## WHITE & CASELLP

By: /s/ Jeffrey E. Schmitt
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<sup>&</sup>lt;sup>1</sup> However, footnote (B) does not affect the relief sought in the Twentieth Omnibus Objection because it only seeks to expunge Danial Do's Claim No. 1102, not Claim No. 1632.

I certify that on September 10, 2008, a copy of the foregoing pleading was sent by First

Class Mail to the parties listed below.

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/s/ Josh M. Hantman Josh M. Hantman