

**Equity IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF KANSAS (KANSAS CITY)**

IN RE:)	
)	Case No: 12-22602
DICKINSON THEATRES, INC., a Kansas)	
Corporation,)	Chapter 11
)	
Debtor.)	

RESPONSE TO DEBTOR’S OBJECTION TO CLAIM NO. 82
FILED EQUITY BANK f/k/a FIRST COMMUNITY BANK

COMES NOW M-III KCEB LLC, transferee of Claim No. 82 filed by Equity Bank f/k/a First Community Bank (Claimant), and in response to Debtor’s Objection to Claim states and alleges as follows:

1. That Equity Bank, formerly doing business as First Community Bank filed Claim No. 82 in the amount of \$2,223,887.81 on November 16, 2012. The claim is secured by real property in the State of Kansas.

2. That the Debtor herein filed an objection to Claim No. 82 on February 28, 2013, which provides the following basis for the objection:

“The nature or amount of the claim is disputed by the Debtor”.

The Debtor inexplicably proposes the expungement of the claim.

3. That Claim No. 82 as well as the underlying loan were transferred for value to M-III KCEB LLC.

4. That given the broad and nebulous basis for the objection to the claim, it is difficult for Claimant to respond with particularity. The claim was filed based upon the outstanding balance of the loan at the time of the filing and by valuing the subject real property serving as collateral utilizing the most recent appraisal of the property.

5. That Claimant demands a hearing on the objection to its claim and further requests that the Court require the Debtor to state with particularity the basis for its objection.

WHEREFORE, for the reasons set forth above, M-III KCEB LLC prays an order of this Court allowing the claim in full as filed, and for such further relief as the Court may deem just.

MERRICK, BAKER & STRAUSS, P.C.

By: /s/ bruce e. strauss

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing was electronically filed with the court using the CM/ECF system, which sent notification to all parties of interest participating in the CM/ECF system on March 21, 2013..

/s/ bruce e. strauss

BRUCE E. STRAUSS