

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
)
HOMELIFE PCE,) Case No. 01-2412 (JWV)
) (Jointly Administered)
Post Confirmation Estate.)
) **Hearing Date: TBD (case is being assigned to a**
) **new judge)**
) **Response Due: October 6, 2003 at 4:00 p.m.**

DECLARATION OF PATRICK REGAN
IN SUPPORT OF HOMELIFE PCE'S
SIXTEENTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) TO CLAIMS

Patrick Regan hereby declares:

1. I am the Plan Administrator of the Homelife PCE (the "Estate")¹. I am authorized to make this Declaration in support of the Estate's Sixteenth Omnibus Objection to Claims (Non-Substantive) (the "Sixteenth Omnibus Objection").

2. I am responsible for overseeing the claims review and objection process in these cases. In that capacity, I have reviewed the Sixteenth Omnibus Objection, and am directly or through the Estate's personnel and attorneys, familiar with the information contained therein, and in the exhibits annexed thereto.

3. Upon information and belief, the Estate's books and records accurately reflect, among other things, the liabilities (including the amounts thereof) owed to its creditors.

4. Under my supervision, considerable resources and time have been expended to ensure a high level of diligence in reviewing and reconciling the proofs of claim filed in these cases. These claims were carefully reviewed and analyzed by appropriate personnel, and in

¹ Capitalized terms not defined herein are as defined in the Sixteenth Omnibus Objection.

some cases, the Estate's professional advisors, resulting in the identification of objectionable claims which are the subject of the Sixteenth Omnibus Objection.

THE DUPLICATE CLAIMS

5. To the best of my knowledge and belief, after thoroughly reviewing the Estate's books and records, and the applicable proofs of claim listed on Exhibit A to the Sixteenth Omnibus Objection, I have determined that the claims listed on Exhibit S where the "Basis for Objection" is designated as "Duplicate" are claims that are duplicates of a previously-filed claim. The Estate proposes that each Claim Number noted as a "Claim to be Expunged" on Exhibit A be replaced by the Surviving Claim Number, also listed on Exhibit A. The Estate requests that the Duplicate Claims be disallowed and expunged for all purposes.

THE LATE-FILED CLAIMS

6. To the best of my knowledge and belief, after thoroughly reviewing the Estate's books and records and the applicable proofs of claim listed on Exhibit B to the Sixteenth Omnibus Objection, I have determined that the Claims listed on Exhibit B where the "Basis for Objection" is designated as "Late Filed" are claims that were not filed before the Governmental Bar Date of January 14, 2002, or the non-Governmental Bar Date of January 28, 2002, as appropriate, despite timely receipt of the Bar Date notice. The Estate requests that the Late Filed Claims listed on Exhibit B be disallowed and expunged for all purposes.

THE AMENDED CLAIMS

7. To the best of my knowledge and belief, after thoroughly reviewing the Estate's books and records, and the applicable proofs of claim listed on Exhibit C to the Sixteenth Omnibus Objection, I have determined that the claims listed on Exhibit C assert claims that are replaced by amended claims. The Estate proposes that the Surviving Claims noted on Exhibit C

replace the initially-filed claims, and that the initially-filed claims be disallowed and expunged for all purposes.

(Remainder of this page intentionally left blank)

Dated: 9/5, 2003


Patrick Regan