

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
DISTRICT OF KANSAS
KANSAS CITY DIVISION

IN THE MATTER OF:

CASE NO. 16-21171

JQH - San Marcos Development, LLC

DEBTOR

CHAPTER 11

CLAIM FOR ADMINISTRATIVE EXPENSE

1. The undersigned is the attorney for The County of Hays, Texas and is authorized to make this proof of claim on behalf of claimant.
2. The Debtor is, as of the time of the filing of this claim, indebted to this claimant for administrative expenses in the sum of \$262,668.54. If taxes for the current tax year are not reflected in the attached tax exhibit, claimant further asserts an unliquidated administrative expense for the current tax year, as well as for each ensuing year in which this debtor or this bankruptcy estate holds the subject property.
3. This claim consists of the following sub-total amounts, and should be distributed as follows:

The County of Hays, Texas	\$262,668.54
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This secured claim is entitled to statutory interest at the rate of 12% per annum pursuant to 11 U.S.C. §506(b) and §511, and Texas Property Tax Code §33.01(c).
4. The basis for this claim is property taxes for which liability arose on January 1 of each tax year with penalty and interest, if any, as of the date of this claim.
5. No note or other negotiable instrument has been received for this debt or any part thereof. No judgment has been rendered on the claim. This claim is not subject to any setoff or counterclaim.
6. The amount of all payments of this claim have been credited and deducted for the purpose of making this proof of claim.
7. This claim is secured with a security interest that is superior to that of any other secured claim pursuant to the Texas Constitution, Article VIII, Section 15, and the Texas Property Tax Code, Section 32.01 and Section 32.05(b). *Stanford v. Butler*, 826 F.2d 353 (5th Cir. 1987).

Dated: June 7, 2017

Respectfully submitted,

MCCREARY, VESELKA, BRAGG & ALLEN, P.C.
Attorneys for Claimant, The County of Hays, Texas

/s/Lee Gordon
Lee Gordon
State Bar Number 08212500
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Round Rock, Texas 78680
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SCHEDULE OF AD VALOREM TAX CLAIMS

THE COUNTY OF HAYS, TEXAS

Account Number: R126535

Assessed Name: JQH-SAN MARCOS DEVELOPMENT LLC

Legal Description: EMBASSY SUITES & CITY OF SAN MARCOS CONFERENCE CENTER SUBD BLOCK A LOT 2 ACRES
8.831 & BUSINESS PERSONAL PROPERTY

Year		Base Tax	Penalty & Interest	Additional Penalty	Attorney Fees	Total Due
2017*	Hays County	110,404.62	0.00			110,404.62
	San Marcos, City	140,645.17	0.00			140,645.17
	Special Road District	11,618.75	0.00			11,618.75
Year Total		\$262,668.54	\$0.00	\$0.00	\$0.00	\$262,668.54
Total Due		\$262,668.54	\$0.00	\$0.00	\$0.00	\$262,668.54

* Estimated Tax Amount

Total Amount of Claim		\$262,668.54	\$0.00	\$0.00	\$0.00	\$262,668.54
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District of Kansas Claims Register

16-21171 JQH - San Marcos Development, LLC

Judge: Robert D. Berger

Chapter: 11

Office: Kansas City

Last Date to file claims:

Trustee:

Last Date to file (Govt):

Creditor: (8743906)

Claim No: 1

Status:

Hays County, Texas

Original Filed

Filed by: CR

c/o Lee Gordon

Date: 06/07/2017

Entered by: Lee Gordon

P.O. Box 1269

Original Entered

Modified:

Round Rock, Texas 78680

Date: 06/07/2017

Amount claimed: \$262668.54

Secured claimed: \$262668.54

History:

[Details](#) [1-1](#) 06/07/2017 Claim #1 filed by Hays County, Texas, Amount claimed: \$262668.54 (Gordon, Lee)

Description:

Remarks:

Claims Register Summary

Case Name: JQH - San Marcos Development, LLC

Case Number: 16-21171

Chapter: 11

Date Filed: 06/26/2016

Total Number Of Claims: 1

Total Amount Claimed*	\$262668.54
Total Amount Allowed*	

*Includes general unsecured claims

The values are reflective of the data entered. Always refer to claim documents for actual amounts.

	Claimed	Allowed
Secured	\$262668.54	
Priority		
Administrative		

District of Kansas Claims Register

[16-21142 John Q. Hammons Fall 2006, LLC](#)

Judge: Robert D. Berger

Chapter: 11

Office: Kansas City

Last Date to file claims:

Trustee:

Last Date to file (Govt):

Creditor: (8699614)

Claim No: 790

Status:

Hays County, Texas

Original Filed

Filed by: CR

c/o Lee Gordon

Date: 06/13/2017

Entered by: Terri Marshall

P.O. Box 1269

Original Entered

Modified:

Round Rock, Texas 78680

Date: 06/13/2017

Amount claimed: \$262668.54

Secured claimed: \$262668.54

History:

[Details](#) [790-1](#) 06/13/2017 Claim #790 filed by Hays County, Texas, Amount claimed: \$262668.54 (Marshall, Terri)

Description: (790-1) Ad Valorem Taxes; Claim for Administrative Expense

Remarks: (790-1) Claim was originally filed as claim number 1 in case 16-21171 on 6/7/17; ECF by Claims Agent 6/13/2017

Claims Register Summary

Case Name: John Q. Hammons Fall 2006, LLC

Case Number: 16-21142

Chapter: 11

Date Filed: 06/26/2016

Total Number Of Claims: 1

Total Amount Claimed*	\$262668.54
Total Amount Allowed*	

*Includes general unsecured claims

The values are reflective of the data entered. Always refer to claim documents for actual amounts.

	Claimed	Allowed
Secured	\$262668.54	
Priority		
Administrative		