

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

IN THE MATTER OF:

CASE NO. 16-21142

JOHN Q. HAMMONS FALL 2006, 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 \$551,369.23. 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	\$551,369.23
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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: January 12, 2018

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

<b>Year</b>		<b>Base Tax</b>	<b>Penalty &amp; Interest</b>	<b>Additional Penalty</b>	<b>Attorney Fees</b>	<b>Total Due</b>
2017	Hays County	101,904.80	0.00			101,904.80
	San Marcos, City	155,930.60	0.00			155,930.60
	Special Road District	11,125.20	0.00			11,125.20
<b>Year Total</b>		<b>\$268,960.60</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$268,960.60</b>
2018*	Hays County	107,000.04	0.00			107,000.04
	San Marcos, City	163,727.13	0.00			163,727.13
	Special Road District	11,681.46	0.00			11,681.46
<b>Year Total</b>		<b>\$282,408.63</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$282,408.63</b>
<b>Total Due</b>		<b>\$551,369.23</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$551,369.23</b>
* Estimated Tax Amount						
<b>Total Amount of Claim</b>		<b>\$551,369.23</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$551,369.23</b>

# 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:** 799

*Status:*

Hays County, Texas

*Original Filed*

*Filed by:* CR

c/o Lee Gordon

*Date:* 01/12/2018

*Entered by:* Lee Gordon

P.O. Box 1269

*Original Entered*

*Modified:*

Round Rock, Texas 78680

*Date:* 01/12/2018

Amount claimed: \$551369.23

Secured claimed: \$551369.23

*History:*

[Details](#) [799-1](#) 01/12/2018 Claim #799 filed by Hays County, Texas, Amount claimed: \$551369.23 (Gordon, Lee )

*Description:*

*Remarks:*

## 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

<b>Total Amount Claimed*</b>	\$551369.23
<b>Total Amount Allowed*</b>	

\*Includes general unsecured claims

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

	Claimed	Allowed
<b>Secured</b>	\$551369.23	
<b>Priority</b>		
<b>Administrative</b>		