

UNITED STATES BANKRUPTCY COURT - DISTRICT OF KANSAS		PROOF OF CLAIM
Name of Debtor: John Q. Hammons Hotels Management, LLC		Case Number: 16-21153
NOTE: This form should not be used to make a claim for an administrative expense arising after the commencement of the case. A request for payment of an administrative expense may be filed pursuant to 11 U.S.C. § 503.		
Name of Creditor (the person or other entity to whom the debtor owes money or property): Matthew Anthony		<input type="checkbox"/> Check this box to indicate that this claim amends a previously filed claim. Court Claim Number: _____ <i>(If known)</i> Filed on: _____
Name and address where notices should be sent: Matthew Anthony (Plaintiff) c/o Bailey & Glasser LLP - Attn: Jonathan Marshall, Esq. 209 Capitol Street, Charleston, West Virginia 25301 Telephone number: (304) 345-6555		
Name and address where payment should be sent (if different from above): <div style="text-align: right;">Clerk U.S. Bankruptcy Court</div> Telephone number:		<input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars. <input type="checkbox"/> Check this box if you are the debtor or trustee in this case.
1. Amount of Claim as of Date Case Filed: <u>\$ Not determined</u> If all or part of your claim is secured, complete item 4 below; however, if all of your claim is unsecured, do not complete item 4. If all or part of your claim is entitled to priority, complete item 5. <input type="checkbox"/> Check this box if claim includes interest or other charges in addition to the principal amount of claim. Attach itemized statement of interest or charges.		
2. Basis for Claim: <u>See Attachment A</u> (See instruction #2 on reverse side.)		5. Amount of Claim Entitled to Priority under 11 U.S.C. §507(a). If any portion of your claim falls in one of the following categories, check the box and state the amount. Specify the priority of the claim. <input type="checkbox"/> Domestic support obligations under 11 U.S.C. §507(a)(1)(A) or (a)(1)(B). <input type="checkbox"/> Wages, salaries, or commissions (up to \$11,725*) earned within 180 days before filing of the bankruptcy petition or cessation of the debtor's business, whichever is earlier - 11 U.S.C. §507 (a)(4). <input type="checkbox"/> Contributions to an employee benefit plan - 11 U.S.C. §507 (a)(5). <input type="checkbox"/> Up to \$2,600* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use - 11 U.S.C. §507 (a)(7). <input type="checkbox"/> Taxes or penalties owed to governmental units - 11 U.S.C. §507 (a)(8). <input type="checkbox"/> Other - Specify applicable paragraph of 11 U.S.C. §507 (a)(). Amount entitled to priority: \$ _____ *Amounts are subject to adjustment on 4/1/13 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment.
3. Last four digits of any number by which creditor identifies debtor: _____ 3a. Debtor may have scheduled account as: _____ (See instruction #3a on reverse side.)		
4. Secured Claim (See instruction #4 on reverse side.) Check the appropriate box if your claim is secured by a lien on property or a right of setoff and provide the requested information. Nature of property or right of setoff: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other Describe: Value of Property: \$ _____ Annual Interest Rate _____ % Amount of arrearage and other charges as of time case filed included in secured claim, if any: \$ _____ Basis for perfection: _____ Amount of Secured Claim: \$ _____ Amount Unsecured: \$ _____		
6. Credits: The amount of all payments on this claim has been credited for the purpose of making this proof of claim.		
7. Documents: Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. You may also attach a summary. Attach redacted copies of documents providing evidence of perfection of a security interest. You may also attach a summary. (See instruction 7 and definition of "redacted" on reverse side.) DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING. If the documents are not available, please explain:		
Date:	Signature: The person filing this claim must sign it. Sign and print name and title, if any, of the creditor or other person authorized to file this claim and state address and telephone number if different from the notice address above. Attach copy of power of attorney, if any.	
		FOR COURT USE ONLY

Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571.

JQH Ctl ID

 00163

INSTRUCTIONS FOR PROOF OF CLAIM FORM

The instructions and definitions below are general explanations of the law. In certain circumstances, such as bankruptcy cases not filed voluntarily by the debtor, there may be exceptions to these general rules.

Items to be completed in Proof of Claim form**Court, Name of Debtor, and Case Number:**

Fill in the federal judicial district where the bankruptcy case was filed (for example, Central District of California), the bankruptcy debtor's name, and the bankruptcy case number. If the creditor received a notice of the case from the bankruptcy court, all of this information is located at the top of the notice.

Creditor's Name and Address:

Fill in the name of the person or entity asserting a claim and the name and address of the person who should receive notices issued during the bankruptcy case. A separate space is provided for the payment address if it differs from the notice address. The creditor has a continuing obligation to keep the court informed of its current address. See Federal Rule of Bankruptcy Procedure (FRBP) 2002(g).

1. Amount of Claim as of Date Case Filed:

State the total amount owed to the creditor on the date of the Bankruptcy filing. Follow the instructions concerning whether to complete items 4 and 5. Check the box if interest or other charges are included in the claim.

2. Basis for Claim:

State the type of debt or how it was incurred. Examples include goods sold, money loaned, services performed, personal injury/wrongful death, car loan, mortgage note, and credit card. If the claim is based on the delivery of health care goods or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information. You may be required to provide additional disclosure if the trustee or another party in interest files an objection to your claim.

3. Last Four Digits of Any Number by Which Creditor Identifies Debtor:

State only the last four digits of the debtor's account or other number used by the creditor to identify the debtor.

3a. Debtor May Have Scheduled Account As:

Use this space to report a change in the creditor's name, a transferred claim, or any other information that clarifies a difference between this proof of claim and the claim as scheduled by the debtor.

4. Secured Claim:

Check the appropriate box and provide the requested information if the claim is fully or partially secured. Skip this section if the claim is entirely unsecured. (See DEFINITIONS, below.) State the type and the value of property that secures the claim, attach copies of lien documentation, and state annual interest rate and the amount past due on the claim as of the date of the bankruptcy filing.

5. Amount of Claim Entitled to Priority Under 11 U.S.C. §507(a).

If any portion of your claim falls in one or more of the listed categories, check the appropriate box(es) and state the amount entitled to priority. (See DEFINITIONS, below.) A claim may be partly priority and partly non-priority. For example, in some of the categories, the law limits the amount entitled to priority.

6. Credits:

An authorized signature on this proof of claim serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

7. Documents:

Attach to this proof of claim form redacted copies documenting the existence of the debt and of any lien securing the debt. You may also attach a summary. You must also attach copies of documents that evidence perfection of any security interest. You may also attach a summary. FRBP 3001(c) and (d). If the claim is based on the delivery of health care goods or services, see instruction 2. Do not send original documents, as attachments may be destroyed after scanning.

Date and Signature:

The person filing this proof of claim must sign and date it. FRBP 9011. If the claim is filed electronically, FRBP 5005(a)(2), authorizes courts to establish local rules specifying what constitutes a signature. Print the name and title, if any, of the creditor or other person authorized to file this claim. State the filer's address and telephone number if it differs from the address given on the top of the form for purposes of receiving notices. Attach a complete copy of any power of attorney. Criminal penalties apply for making a false statement on a proof of claim.

DEFINITIONS**Debtor**

A debtor is the person, corporation, or other entity that has filed a bankruptcy case.

Creditor

A creditor is a person, corporation, or other entity owed a debt by the debtor that arose on or before the date of the bankruptcy filing. See 11 U.S.C. §101 (10)

Claim

A claim is the creditor's right to receive payment on a debt owed by the debtor that arose on the date of the bankruptcy filing. See 11 U.S.C. §101 (5). A claim may be secured or unsecured.

Proof of Claim

A proof of claim is a form used by the creditor to indicate the amount of the debt owed by the debtor on the date of the bankruptcy filing. The creditor must file the form with the clerk of the same bankruptcy court in which the bankruptcy case was filed.

Secured Claim Under 11 U.S.C. §506(a)

A secured claim is one backed by a lien on property of the debtor. The claim is secured so long as the creditor has the right to be paid from the property prior to other creditors. The amount of the secured claim cannot exceed the value of the property. Any amount owed to the creditor in excess of the value of the property is an unsecured claim. Examples of liens on property include a mortgage on real estate or a security interest in a car.

A lien may be voluntarily granted by a debtor or may be obtained through a court proceeding. In some states, a court judgment is a lien. A claim also may be secured if the creditor owes the debtor money (has a right to setoff).

Unsecured Claim

An unsecured claim is one that does not meet the requirements of a secured claim. A claim may be partly unsecured if the amount of the claim exceeds the value of the property on which the creditor has a lien.

Claim Entitled to Priority Under 11 U.S.C. §507(a)

Priority claims are certain categories of unsecured claims that are paid from the available money or property in a bankruptcy case before other unsecured claims.

Redacted

A document has been redacted when the person filing it has masked, edited out, or otherwise deleted, certain information. A creditor should redact and use only the last four digits of any social-security, individual's tax-identification, or financial-account number, all but the initials of a minor's name and only the year of any person's date of birth.

Evidence of Perfection

Evidence of perfection may include a mortgage, lien, certificate of title, financing statement, or other document showing that the lien has been filed or recorded.

INFORMATION**Acknowledgment of Filing of Claim**

To receive acknowledgment of your filing, you may either enclose a stamped self-addressed envelope and a copy of this proof of claim or you may access the court's PACER system (www.pacer.psc.uscourts.gov) for a small fee to view your filed proof of claim.

Offers to Purchase a Claim

Certain entities are in the business of purchasing claims for an amount less than the face value of the claims. One or more of these entities may contact the creditor and offer to purchase the claim. Some of the written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court or the debtor. The creditor has no obligation to sell its claim. However, if the creditor decides to sell its claim, any transfer of such claim is subject to FRBP 3001(c), any applicable provisions of the Bankruptcy Code (11 U.S.C. § 101 *et seq.*), and any applicable orders of the bankruptcy court.

Exhibit A

UNITED STATES BANKRUPTCY COURT
DISTRICT OF KANSAS

-----X
In re

:
: Chapter 11
:

JOHN Q. HAMMONS HOTELS
MANAGEMENT, LLC:

:
Case No. 16-21153
:

Debtor.
:
:
:
-----X

**PROOF OF CLAIM
ATTACHMENT A**

The foregoing Claimant reserves its rights (a) to amend this Proof of Claim at any time and from time to time in any respect whatsoever, (b) to assert new or additional claims under the laws, rules, regulations, orders, decrees, or agreements applicable to the Debtor, (c) to assert and prove an actual or estimated amount with respect to its contingent claims, and (d) to withdraw this Proof of Claim.

Neither this Proof of Claim, nor the Claimant's filing thereof, nor any other appearance, pleading, claim, or suit by the Claimant, shall constitute or be deemed as (a) a submission or consent to the jurisdiction of the Bankruptcy Court to hear and determine any matter, including, without limitation, any matter relating to the existence or extent of the Claimant's rights, claims, actions, or causes of action against the Debtor, whether now existing or hereafter arising or (b) a waiver of (i) the right to assert that this Court may not hear, determine, and enter final judgment with respect to any matter, (ii) the right to have final orders in non-core matters entered only after *de novo* review by a judge of the United States District Court, (iii) the right to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction of this Court for any purpose, (v) an election of remedy, or (vi) any other rights, claims, actions, defenses, setoffs, or recoupments, in law, in equity, or under any agreements, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Exhibit B

SUMMONS

IN THE CIRCUIT COURT OF KANAWHA COUNTY, WEST VIRGINIA

MATTHEW ANTHONY, Individually
and on behalf of those similarly situated,

Plaintiff,

v.

CIVIL ACTION NO.: 15-C-1075
JUDGE King

JOHN Q. HAMMONS HOTELS MANAGEMENT, LLC,

Defendant.

TO: John Q. Hammons Hotels Management, LLC
c/o CT Corporation Service Company
209 West Washington Street
Charleston, WV 25313

To the above-named Defendant:

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby summoned and required to serve upon Todd S. Bailess, 120 Capitol Street, Charleston, WV 25301 Plaintiff's attorney, an answer to the complaint filed against you in the above styled civil action, a true copy of which is herewith delivered to you. You may assert in your answer any claim you may have against the plaintiff which is related to the subject matter of the complaint. You are required to serve your answer within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint and you will be thereafter barred for asserting in another action any claim you may have which must be asserted by counterclaim in the above styled civil action.

Dated: 6/1/15

Cathy S. Gatson, Clerk

CLERK

Dymsteward Deputy Clerk

IN THE CIRCUIT COURT OF KANAWHA COUNTY, WEST VIRGINIA

ms cpy
2015 JUN -1 PM 1:00

**MATTHEW ANTHONY, Individually
and on behalf of those similarly situated,**

CATHY S. ...
KANAWHA COUNTY CIRCUIT COURT

Plaintiff,

v.

CIVIL ACTION NO.: 15-C-1075
JUDGE King

JOHN Q. HAMMONS HOTELS MANAGEMENT, LLC,

Defendant.

COMPLAINT

1. This is an action against John Q. Hammons Hotels Management, LLC arising from its breach of duty owed to Plaintiff and its other former employees under the West Virginia Wage Payment and Collection Act ("WPCA"), W. Va. Code § 21-5-1, *et seq.* Specifically, Defendant has violated the WPCA by failing to pay its former discharged employees within the time periods required by the WPCA. To enforce West Virginia law and to stop this practice, the Plaintiff brings this action on his own behalf and on behalf of other employees of Defendant who were discharged and not paid their wages within the period of time required by law.

PARTIES

2. Plaintiff was at all times relevant herein, a resident of West Virginia and employed with Defendant.

3. Defendant, John Q. Hammons Hotels Management, LLC is a Missouri corporation and at all times relevant herein, conducted business in Kanawha County, West Virginia.

FACTS

4. Defendant is, and has always been, obligated to pay its employees working in West Virginia pursuant to the requirements of the WPCA.

5. Defendant, however, failed to pay discharged employees all wages due within the time periods mandated by the WPCA.

6. Plaintiff worked for Defendant until Defendant terminated his employment on October 28, 2013.

7. Consistent with the Defendant's pay practices, Defendant failed to pay Plaintiff all his employment wages due within the time period mandated by the WPCA.

8. Specifically, Defendant did not pay all owed wages to Plaintiff until on or after November 26, 2013.

CLASS ALLEGATIONS

9. This paragraph incorporates by reference all of the preceding paragraphs as if they were set forth fully herein.

10. Plaintiff seeks relief pursuant to Rule 23 of the West Virginia Rules of Civil Procedure on behalf of the following proposed class:

All persons formerly employed by the Defendant in West Virginia who were discharged and not paid all wages within 72 hours if discharged prior to July 12, 2013, or within four business days or the next regular payday, whichever comes first, if discharged on or after July 12, 2013, at any time five years prior to the filing of this Complaint through class certification.

11. Plaintiff reserves the right to refine the class definition in light of discovery and additional investigation.

12. The putative class is so numerous that joinder of all members is impractical.

13. There are questions of law and fact common to the putative class, which predominate over any questions affecting only individual class members.

14. Plaintiff's claim is typical of those of the putative class and said claims are based on the same legal and factual theories.

15. Plaintiff will fairly and adequately protect the interests of the class.

16. A class action is a superior method for the fair and efficient adjudication of this particular claim and controversy.

17. The interest of putative class members in individually controlling and maintaining the prosecution of separate claims against Defendant is small given the fact that they are unlikely to be aware of their legal rights and the amount of actual damages they are entitled to receive.

18. The management of this class claim is likely to present no particular difficulties.

**Count I – Violation of Wage Payment and
Collection Act – failure to pay wages timely
(Individual claim and class claim)**

19. This paragraph incorporates by reference all of the preceding paragraphs as if they were set forth fully herein.

20. Defendant failed to pay Plaintiff and other similarly-situated class members their employment wages in full within the time periods mandated by the WPCA for discharged employees.

21. Defendant's actions violated the WPCA, entitling Plaintiff and other similarly-situated class members to treble damages and to attorneys' fees and costs pursuant to W. Va. Code § 21-5-1, *et seq.*

STIPULATION

22. Plaintiff stipulates that, with respect to his individual claim, he seeks a recovery of not more than \$75,000, exclusive of costs and interest.

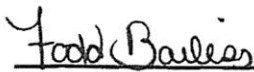
23. Plaintiff agrees to be bound by this stipulation throughout the pendency of this action.

WHEREFORE, Plaintiff prays for the following relief for himself and on behalf of a class of similarly situated individuals:

1. That the Court enter judgment against the Defendant on all counts alleged in this Complaint;
2. That the Court award Plaintiff and each member of the Class the damages set forth in this Complaint, including all remedies afforded under the West Virginia Wage Payment and Collection Act in an amount to be determined by a jury;
3. That the Court award Plaintiff and each member of the class pre- and post-judgment interest as provided by law;
4. That the Court award Plaintiff and each member of the class attorneys' fees and costs;
5. Injunctive relief; and
6. Such further relief as this court may deem just and equitable.

PLAINTIFF DEMANDS A JURY TRIAL

Matthew Anthony,
By Counsel


Todd S. Bailess (WVSB #10482)
Joy B. Mcga (WVSB #9960)
Bailess Law, PLLC
120 Capitol Street
Charleston, West Virginia 25301
Telephone: (304) 342-0550
Facsimile: (304) 344-5529

Rodney A. Smith (WVSB #9750)
Jonathan R. Marshall (WVSB #10580)
Tony L. Clackler II (WVSB #12527)
Bailey & Glasser, LLP
209 Capitol Street
Charleston, West Virginia 25301
Telephone: (304) 345-6555
Facsimile: (304) 342-1110

IN THE CIRCUIT COURT OF KANAWHA COUNTY, WEST VIRGINIA

MATTHEW ANTHONY, Individually
and on behalf of those similarly situated,

Plaintiff,

v.

CIVIL ACTION NO.: 15-C-1075
JUDGE King

JOHN Q. HAMMONS HOTELS MANAGEMENT, LLC,

Defendant.

BINDING STIPULATION

Plaintiff and his counsel stipulate by their signatures below that they are not seeking and will not in any event seek a recovery in excess of \$75,000, exclusive of costs and interest with respect to Plaintiff's individual claims.


Respectfully Submitted,
By Counsel,

Todd Bailess

Todd S. Bailess (WVSB #10482)
Joy B. Mega (WVSB #9960)
Bailess Law, PLLC
120 Capitol Street
Charleston, West Virginia 25301
Telephone: (304) 342-0550
Facsimile: (304) 344-5529

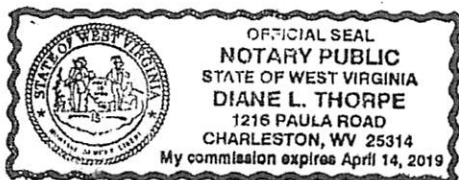
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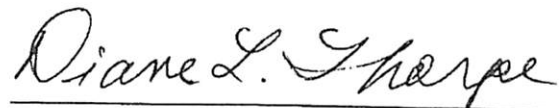
Stipulated as stated above:


Plaintiff Matthew Anthony

Taken, subscribed and sworn to before the undersigned authority, this 27 day of
March, 2015.

My commission expires: April 14, 2019




Notary Public

SUMMONS

IN THE CIRCUIT COURT OF KANAWHA COUNTY, WEST VIRGINIA

MATTHEW ANTHONY, Individually
and on behalf of those similarly situated,

Plaintiff,

v.

CIVIL ACTION NO.: 15-C-1075
JUDGE King

JOHN Q. HAMMONS HOTELS MANAGEMENT, LLC,

Defendant.

TO: John Q. Hammons Hotels Management, LLC
c/o CT Corporation Service Company
209 West Washington Street
Charleston, WV 25313

To the above-named Defendant:

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby summoned and required to serve upon Todd S. Bailess, 120 Capitol Street, Charleston, WV 25301 Plaintiff's attorney, an answer to the complaint filed against you in the above styled civil action, a true copy of which is herewith delivered to you. You may assert in your answer any claim you may have against the plaintiff which is related to the subject matter of the complaint. You are required to serve your answer within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint and you will be thereafter barred for asserting in another action any claim you may have which must be asserted by counterclaim in the above styled civil action.

Dated: 6/1/15

Cathy S. Gatson, Clerk

CLERK

Dymostean Deputy Clerk

IN THE CIRCUIT COURT OF KANAWHA COUNTY, WEST VIRGINIA

MATTHEW ANTHONY, Individually
and on behalf of those similarly situated,

Plaintiff,

v.

CIVIL ACTION NO.: 15-C-1075
JUDGE King

JOHN Q. HAMMONS HOTELS MANAGEMENT, LLC,

Defendant.

Plaintiff's Motion for Class Certification

Plaintiff Matthew Anthony respectfully requests that the Court certify the following class of similarly situated persons:

All persons formerly employed by the Defendant in West Virginia who were discharged and not paid all wages within 72 hours if discharged prior to July 12, 2013, or within four business days or the next regular payday, whichever comes first, if discharged on or after July 12, 2013, at any time five years prior to the filing of this Complaint through class certification.

The Plaintiff requests that the Court appoint Matthew Anthony as class representative, and Bailey & Glasser, LLP and Bailess Law, PLLC, as class counsel.

The Plaintiff further asks the Court to set a briefing schedule on this motion that will allow Plaintiff time to conduct discovery on class certification issues and to file a supplemental memorandum in support of class certification. See *Love v. Georgia-Pacific Corp.*, 590 S.E.2d 677, 681 (W. Va. 2003) ("Where a party seeks to proceed as a class representative under Rule 23 . . . reasonable discovery related to class certification issues is appropriate, particularly where the pleadings and record do not sufficiently indicate the presence or absence of the requisite facts to warrant an initial determination of class action status.").

In further support of this motion, the Plaintiff states:

1. This case arises from Defendant's failure to pay discharged employees their wages within the period of time required by the West Virginia Wage Payment and Collection Act, W. VA. CODE § 21-5-1 *et seq.* ("WPCA").
2. The Defendant discharged Plaintiff and other similarly-situated individuals and failed to pay them within the period of time required by the WPCA. *See* W. VA. CODE § 21-5-4.
3. All requirements of Rule 23 of the West Virginia Rules of Civil Procedure are met in this case.
4. Numerosity. The Plaintiff's claims are based on Defendant's policy of not paying its employees within the time period required by the WPCA. As a result of Defendant's pay policies, a WPCA violation is believed to have occurred every time Defendant terminated an employee. Therefore, the class is believed to be so numerous that joinder of all members is impracticable. W. VA. R. CIV. P. 23(a)(1).
5. Common Questions Predominate. This case involves allegations that Defendant's policy for paying terminated employees violates West Virginia law. The legal and factual questions at issue in this case are common to all class members. W. VA. R. CIV. P. 23(a)(2) & 23(b)(3).
6. Typicality. The Plaintiff's claims are typical of the other class members. Like other members of the class, Defendant terminated Plaintiff's employment and Plaintiff was not paid all wages in the period of time required by the WPCA. The Plaintiff and other class members' claims are all based on a substantially identical set of facts and circumstances. W. VA. R. CIV. P. 23(a)(3).

7. Adequacy. Plaintiff and counsel will fairly and adequately represent the members of the class in this case. W. VA. R. CIV. P. 23(a)(4). The Plaintiff's interests in this litigation are aligned with those of the class, and Plaintiff's attorneys are experienced in class action and wage and hour litigation.

8. Superiority. A class action is necessary to determine that Defendant's conduct violates the WPCA and to redress class members' statutory damages. The class mechanism is superior to individual actions in this case. W. VA. R. CIV. P. 23(b)(3).

Because the prerequisites of West Virginia Rule of Civil Procedure 23 are satisfied, the Court should certify the class. The Plaintiff respectfully requests that the Court set a briefing schedule on this motion that will permit them to conduct discovery on class certification issues and to file a supplemental memorandum in support of class certification. *See Love*, 590 S.E.2d at 681.

WHEREFORE, Plaintiff respectfully requests that the Court certify the class described above, appoint Matthew Anthony as class representative, and appoint Bailey & Glasser, LLP and Bailess Law, PLLC, as class counsel.

Plaintiff,
By Counsel

Todd Bailess

Todd S. Bailess (WVSB #10482)
Joy B. Mega (WVSB #9960)
Bailess Law, PLLC
120 Capitol Street
Charleston, West Virginia 25301
Telephone: (304) 342-0550
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Bailey & Glasser, LLP

209 Capitol Street
Charleston, West Virginia 25301
Telephone: (304) 345-6555
Facsimile: (304) 342-1110

IN THE CIRCUIT COURT OF KANAWHA COUNTY, WEST VIRGINIA

MATTHEW ANTHONY, Individually
and on behalf of those similarly situated,

Plaintiff,

v.

CIVIL ACTION NO.: 15-C-1075
JUDGE KING

JOHN Q. HAMMONS HOTELS MANAGEMENT, LLC

Defendant.

**PLAINTIFF'S FIRST SET OF INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS TO
DEFENDANT JOHN Q. HAMMONS HOTELS MANAGEMENT, LLC**

Pursuant to Rules 26, 33, and 34 of the West Virginia Rules of Civil Procedure, Plaintiff, through counsel, request that Defendant John Q. Hammons Hotels Management, LLC ("Defendant") respond to Plaintiff's request for discovery made herein under oath within forty-five (45) days from the date of service and to produce documents and/or tangible items to all Plaintiff's counsel on or before the expiration of the above-referenced time period.

For the purposes of these requests, the following definitions apply in the absence of contrary indications of text:

1. "Defendant" means John Q. Hammons Hotels Management, LLC;
2. "Identify," "identity," or "identification" as applied to a person including persons living or dead, means to state the following:

- a. Full name;
- b. Relationship of the person to the Defendant including job title;
- c. Job description;
- d. Present business and home address;

- e. The name of the person's immediate supervisor; and
- f. The telephone number(s) where that person may be reached.

3. "Identify," "identity," or "identification" as applied to any writing or documents means to state the following:

- a. Its date or date on which it was executed;
- b. The identity of its author;
- c. The identity of its sender, if applicable;
- d. The identity of its recipient, if applicable;
- e. Its title and format;
- f. A complete summary of its contents;
- g. The identity of persons known or believed to have possession, custody, or

access to the writing;

- h. Its location; and,

i. In lieu of subparagraphs a, e and f above, and to obviate a request to produce said writing or document(s), the Defendant may attach a true and accurate copy thereof to answers to these requests.

4. "Identify," "identity," or "identification" as applied to a company, limited liability company, association, partnership, or any legal entity other than a natural person, means to state the following:

- a. Full name and type of organization or entity;
- b. Address of principal place of business; and
- c. Jurisdiction and date of incorporation of limited liability company, corporation or organization, if known.

5. "Document" or "documents" are used in their broadest possible sense and means the original and any nonidentical copy(s) of any drafts of any written, printed, recorded, graphic or photographic matter of reproduction, however produced or reproduced, including but not limited to: correspondence, time cards, written communications, drawings, plans, specifications, estimates, time sheets, vouchers, permits, regulations, rules, procedures, contracts, agreements, orders, charts, graphs, photographs, calendars, date books, diaries, logs, notes, memoranda, treatises, manuals, source expense reports, slides, analyses, projections, official forms, minutes, e-mails, text messages, electronic communications, actuarial and/or valuation data, delivery schedules, work papers, work schedules, computer printouts, computer disks, tapes, tape recordings, and other data compilations from which information can be obtained that was prepared or received by, or in the possession, custody, or control of any whose identity, existence, or location is known or ascertainable by the person, as defined above, answering these requests.

6. With respect to any document which is withheld on a claim of privilege or immunity, provide a statement signed by Defendant's attorney setting forth as to each such document;

- a. The name of the sender(s) of the document;
- b. The name of the author(s) of the document;
- c. The name of the person(s) to whom copies were sent or otherwise made available;
- d. The job title of every person named in (a), (b) and (c) above;
- e. The date of the document;
- f. The date on which the document was received by each addressee

or other recipient;

- g. A brief description of the nature and subject matter of the document;
 - h. The statute, rule or decision which is claimed to give rise to the privilege;
- and
- i. The detailed factual basis for the claim of privilege.

7. Regarding the terms "wages," Plaintiff adopts the definition as set forth in W. Va. Code § 21-5-1.

8. If you maintain that any document or record which refers to or relates to anything about which these interrogatories or responses ask has been destroyed, set forth the content of said document, the date of such destruction and the name of the person who ordered or authorized such destruction.

9. Where the answer or response to any of the following interrogatories or requests may be derived or ascertained from any records of said Defendant or from an examination, audit or inspection of such records, or from a compilation, abstract or summary based thereon, specify the records from which the answer may be derived or ascertained.

10. If Defendant objects to any Interrogatory or Request, Defendant should answer that portion of the Interrogatory or Request that is not objectionable.

11. These requests are to be considered continuing in nature; you are requested to provide, by way of supplementary answers, such additional information as you or any person acting on your behalf may obtain which will augment or modify your initial answers, as required by Rule 26 of the West Virginia Rules of Civil Procedure.

INTERROGATORIES

1. Please provide a list of all Defendant's employees employed in West Virginia from five years prior to the filing of this Complaint through the present, who were discharged by Defendant, and for each provide: (1) the last day worked by the employee; (2) the date the employee was informed that his/her employment was terminated; (3) the official termination date; (4) the gross amount of wages paid upon termination of his/her employment; (5) an itemized description of the wages paid (i.e. hourly, salary, vacation, sick, PTO, bonuses, commissions, etc.); (6) the date the wages were paid; and (7) the manner in which the wages were paid (i.e. direct deposit, hand-delivery, United States mail, debit card, etc.).

ANSWER:

2. Please identify by name, telephone number, address, and title/position all persons furnishing information in response to these discovery requests.

ANSWER:

3. Please identify each and every insurance agreement under which an insurer may be liable to satisfy part or all of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgment. In connection therewith, please state the following:

- a. The name of the insurer;
- b. The identification number of the policy;
- c. The amount of coverage under such policy;
- d. Whether notice of this claim has been provided to the insurer;
- e. Whether a defense of this claim is being provided by the insurer; and

f. Whether there has been a declination of any coverage or reservation of rights by the insurer.

ANSWER:

4. Please identify any person(s) who is likely to have discoverable information related to the facts and allegations in Plaintiff's Complaint and/ or Defendant's Answer. Please include the phone number and addresses of the person(s); his or her position with Defendant, if he or she is an employee; and the allegation and/or defenses concerning which the person(s) have knowledge.

ANSWER:

5. Aside from the instant action, please identify and describe in detail each legal action brought against you in West Virginia pursuant to the West Virginia Wage Payment and Collection Act during the five (5) years immediately preceding the events which have given rise to this cause of action, including the names and addresses of all parties; both the plaintiff(s) and the defendant(s); the date of the filing of the action; the jurisdiction in which the action was filed; the substance of the facts, as set out in the pleadings; the jurisdiction in which the action came to trial if different from the jurisdiction in which the action was filed; whether the action has been settled, adjudicated or is pending; the nature or result of any disposition of the action and the name and address of the attorney representing the plaintiff(s) in said action.

ANSWER:

6. Please "identify" the person(s) responsible for implementing and ensuring compliance with the West Virginia Wage Payment and Collection Act on behalf of Defendant from 2010 to the present.

ANSWER:

7. Please identify and describe, with specificity and detail, the factual basis for each affirmative defense Defendant asserted in Defendant's Answer, and identify or produce each document or information that supports such affirmative defense.

ANSWER:

8. Please identify the name, address, and telephone number, title and place of employment of each person, other than expert witnesses, whom you intend to call as witnesses at the trial of this case and state the substance of each person's anticipated testimony.

ANSWER:

9. Please list and describe each exhibit and demonstrative aid Defendant's intend to attempt to introduce into evidence at the trial of this case. You may attach copies of exhibits listed in your answer in lieu of describing the exhibits.

ANSWER:

10. Please identify each expert witness you intend on calling at trial and state the following:

- a. The name, address, occupation, and area of specialty of each such expert;
- b. The subject matter on which the expert is expected to testify;
- c. The facts and opinions to which the expert is expected to testify; and
- d. The grounds for each such opinion to be rendered by each.

ANSWER:

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Produce all documents relating to Plaintiff's employment with Defendant. This Request includes, but is not limited to, the following: employment applications, e-mails sent and/or received by you regarding Plaintiff, performance evaluations, medical file, attendance

records, investigation notes or summaries, disciplinary actions, pay stubs, time records, W-2s, awards, and compensation records. This request is not limited to those documents contained in Plaintiff's "personnel file" or other such named employee file, but encompasses all responsive documents regardless of where such information is filed, kept and/or maintained. This request is not seeking any documents that would be protected by the attorney client privilege.

RESPONSE:

2. Regarding the discharge for each individual identified in Interrogatory No. 1 above, produce copies of all discharge letters, memoranda regarding the employees' discharge, notices, write-ups, e-mails, memoranda regarding the employees' final paychecks, letters regarding final paychecks, and any other documents evidencing the date of discharge, the amount of wages owed upon termination, the manner in which the final paychecks were delivered, and/or the reason for discharge.

RESPONSE:

3. Produce the last known home address and telephone numbers for all employees identified in Interrogatory No. 1.

RESPONSE:

4. For 2010 through the present, produce all document retention policies concerning the retention of employment and payroll records.

RESPONSE:

5. For 2010 through the present, produce documents concerning the manner in which Defendant's payroll practices were modified, designed, or updated to comply or attempt to comply with West Virginia wage payment and collection law, and the date of such changes and all documents and communications regarding Defendant's efforts.

RESPONSE:

6. For 2010 through the present, produce all internal communications, documents, and electronic information concerning Defendant's pay practices in West Virginia, including final pay upon termination of an employee.

RESPONSE:

7. For 2010 through the present, produce documents concerning the operation and management of the payroll software and systems Defendant uses to manage its payroll in West Virginia.

RESPONSE:

8. Produce any posters, signs, or other documents that Defendant posted at any of its West Virginia locations and/or made available to its West Virginia employees regarding the payment of employment wages to West Virginia employees for the time period of 2010 through the present, as required by W.Va. Code § 21-5-9.

RESPONSE:

9. Produce all liability insurance policies to which you referred in Interrogatory No. 3, which you contend provide coverage for the matters set forth in Plaintiff's Complaint.

RESPONSE:

10. For 2010 through the present, produce Defendant's policy manual, employee handbook, and employee guidelines for its West Virginia employees, including but not limited to, any document that addresses the payment of wages to its West Virginia employees.

RESPONSE:

11. Produce all documents or tangible things that identify, constitute, relate to, refer to, or pertain to oral or written communication that Defendant had with other individuals (including Defendant's officers, employees, or representatives) about:

- a. The subject matter of this civil action;
- b. The payment of wages to Defendant's West Virginia employees who have been discharged; and
- c. The West Virginia Wage Payment and Collection Act.

This request specifically includes any and all e-mail correspondence referencing in any manner the subject of this civil action.

RESPONSE:

12. If any proposed expert witnesses have rendered a written report, produce a copy of each and every such report – including drafts and revisions. Also, please produce all correspondence, memoranda, e-mails, or similar “communications” between you (and/or your counsel) and the proposed expert witness.

RESPONSE:

13. To the extent not previously produced, produce all documents, demonstrative aids, or other tangible things that Defendant intends to, or may introduce as exhibits at the trial of this case.

RESPONSE:

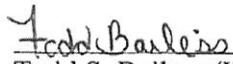
14. To the extent not previously produced, produce all documents or other tangible things that support any defenses raised by Defendant in this case.

RESPONSE:

15. Produce any and all documents consulted or relied upon in responding to these discovery requests.

RESPONSE:

PLAINTIFF,
By Counsel.



Todd S. Bailess (WVSB# 10482)
Joy B. Mega (WVSB# 9960)
Bailess Law, PLLC
120 Capitol Street
Charleston, West Virginia 25301
Telephone: (304) 342-0550
Facsimile: (304) 344-5529

Rodney A. Smith (WVSB #9750)
Jonathan R. Marshall (WVSB #10580)
Bailey & Glasser, LLP
209 Capitol Street
Charleston, West Virginia 25301
Telephone: (304) 345-6555
Facsimile: (304) 342-1110

IN THE CIRCUIT COURT OF KANAWHA COUNTY, WEST VIRGINIA

**MATTHEW ANTHONY, Individually
and on behalf of those similarly situated,**

Plaintiff,

v.

**CIVIL ACTION NO.: 15-C-1075
JUDGE KING**

JOHN Q. HAMMONS HOTELS MANAGEMENT, LLC

Defendant.

CERTIFICATE OF SERVICE

Counsel for Plaintiff certifies that the foregoing **"Plaintiff's First Set of Interrogatories and Requests for Production of Documents to Defendant John Q. Hammons Hotels Management, LLC** was served this 23rd day of June 2015, by sending a true exact copy via U.S. mail, postage pre-paid, to the following:

John Q. Hammons Hotels Management, LLC
c/o CT Corporation Services Company
209 West Washington Street
Charleston, WV 25313

Todd S. Bailess
Todd S. Bailess (WVSB# 10482)
Joy B. Mega (WVSB# 9960)
Bailess Law, PLLC
120 Capitol Street
Charleston, West Virginia 25301
Telephone: (304) 342-0550
Facsimile: (304) 344-5529

IN THE CIRCUIT COURT OF KANAWHA COUNTY, WEST VIRGINIA

MATTHEW ANTHONY, Etc.

PLAINTIFF,

vs.

Civil Action No. 15-C-1075 (King)

JOHN Q. HAMMONS HOTELS
MANAGEMENT, LLC,

DEFENDANT.

ANSWER OF DEFENDANT

Defendant John Q. Hammons Hotels Management, LLC answers the Complaint against it as follows:

FIRST DEFENSE

The Complaint fails to state a claim against this Defendant upon which relief may be granted.

SECOND DEFENSE

1. For answer to paragraph 1 of the Complaint, this Defendant denies the same and demands strict proof thereof.
2. For answer to paragraph 2 of the Complaint, this Defendant admits the same upon information and belief.
3. For answer to paragraph 3 of the Complaints, this Defendant admits the same except to deny that it is a Missouri corporation and, instead, states affirmatively that it is a Missouri limited liability company.

{H0987094.2 }

4. For answer to paragraph 4 of the Complaint, this Defendant states that the allegations therein are ones of law and not of fact and therefore this Defendant is not required to either admit or deny the same.
5. For answer to paragraph 5 of the Complaint, this Defendant is without information at this time sufficient to form a belief as to the truth of the matters alleged therein and, accordingly, denies the same and demands strict proof thereof.
6. For answer to the paragraph 6 of the Complaint, this Defendant admits the same.
7. For answer to paragraph 7 of the Complaint, this Defendant admits it failed to pay Plaintiff all his employment “wages” (as that term is defined by the WPCA) due him within the time period mandated by the WPCA, denies that failing to pay within the time period mandated by the WPCA is “consistent with the Defendant’s pay practices,” and states affirmatively that, the final wages Defendant had inadvertently failed to pay Plaintiff within the time period mandated by the WPCA was his accumulated paid time off totaling \$117.75, because it had difficulty getting the same to him as Plaintiff had not provided Defendant with working telephone numbers by which to reach him.
8. For answer to paragraph 8 of the Complaint, this Defendant admits it did not pay all “wages” (as that terms is defined by the WPCA) due Plaintiff until on or after November 26, 2013, but states affirmatively that all wages due Plaintiff have in fact been paid him.
9. For answer to paragraph 9 of the Complaint, this Defendant incorporates by reference its answers to paragraphs 1-8 of the Complaint as if fully rewritten here.
10. For answer to paragraph 10 of the Complaint, this Defendant denies the same and demands strict proof thereof.

11. For answer to paragraph 11 of the Complaint, this Defendant denies the same and demands strict proof thereof.
12. For answer to paragraph 12 of the Complaint, this Defendant denies the same and demands strict proof thereof.
13. For answer to paragraph 13 of the Complaint, this Defendant denies the same and demands strict proof thereof.
14. For answer to paragraph 14 of the Complaint, this Defendant denies the same and demands strict proof thereof.
15. For answer to paragraph 15 of the Complaint, this Defendant denies the same and demands strict proof thereof.
16. For answer to paragraph 16 of the Complaint, this Defendant denies the same and demands strict proof thereof.
17. For answer to paragraph 17 of the Complaint, this Defendant denies the same and demands strict proof thereof.
18. For answer to paragraph 18 of the Complaint, this Defendant denies the same and demands strict proof thereof.
19. For answer to paragraph 19 of the Complaint, this Defendant incorporates its answers to paragraphs 1-18 of the Complaint as if fully rewritten here.
20. For answer to paragraph 20 of the Complaint, this Defendant denies the same and demands strict proof thereof, except to admit that Plaintiff was not timely paid \$117.75 of accumulated paid time off due him.

21. For answer to paragraph 21 of the Complaint, this Defendant states that the allegations therein are of a legal conclusion and not allegations of fact and, accordingly, this Defendant is not required to either admit or deny.

22. For answer to paragraph 22 of the Complaint, this Defendant states that this paragraph is a stipulation of Plaintiff and not an allegation of fact and, accordingly, this Defendant is not required to either admit or deny.

23. For answer to paragraph 23 of the Complaint, this Defendant states that the allegation therein is a stipulation of Plaintiff and not an allegation of fact, and, accordingly, this Defendant is not required to either admit or deny.

24. Except as expressly admitted herein, this Defendant denies the allegations of the Complaint against it including, without limitation, the prayer or demand for relief and the motion for class status.

THIRD DEFENSE

Plaintiff has failed to allege facts sufficient to establish a putative class under Rule 23 of the West Virginia Rules of Civil Procedure as, *inter alia*, Plaintiff cannot meet the requirements of numerosity and typicality, as any other instances involving delayed payment of final wages are so atypical and infrequent as not to warrant certification of a class.

FOURTH DEFENSE

Plaintiff has been paid all wages due him under the West Virginia Wage Payment and Collection Act.

FIFTH DEFENSE

To the extent the same may prove applicable with respect to any of the allegations contained within the Complaint, Defendant asserts the affirmative defenses of waiver and/or estoppel and of laches and/or statute of limitations.

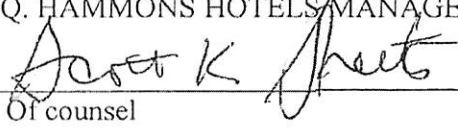
SIXTH DEFENSE

Defendant reserves the right to rely upon each and every affirmative defense which may prove applicable during the course of these proceedings.

WHEREFORE, having fully answered the Complaint against it, Defendant John Q. Hammons Hotels Management, LLC prays that Plaintiff's Complaint be dismissed with prejudice, and that this Defendant be awarded its costs and attorneys' fees herein expended, and such other relief as to the Court seems just and proper.

JOHN Q. HAMMONS HOTELS MANAGEMENT, LLC

By


Of counsel

Scott K. Sheets, Esq. (WVSB #4344)
DINSMORE & SHOHL LLP
611 Third Avenue
Huntington, WV 25701
Tel: (304) 691-8418
Fax: (304) 522-4312
E-mail: scott.sheets@dinsmore.com

Counsel for Defendant, John Q. Hammons Hotels Management, LLC

IN THE CIRCUIT COURT OF KANAWHA COUNTY, WEST VIRGINIA

MATTHEW ANTHONY, Etc.

PLAINTIFF,

vs.

Civil Action No. 15-C-1075 (King)


JOHN Q. HAMMONS HOTELS
MANAGEMENT, LLC,

DEFENDANT.

CERTIFICATE OF SERVICE

The undersigned does hereby certify that the foregoing *Answer of Defendant* was served upon counsel of record by depositing a true and accurate copy of the same in the U. S. Mail, postage pre-paid, this 20th day of July, 2015, addressed as follows:

Todd S. Bailess
Joy B. Mega
Bailess Law, PLLC
120 Capitol Street
Charleston, WV 25301



Scott K. Sheets (WVSB #4344)
DINSMORE & SHOHL LLP
611 Third Avenue
Huntington, West Virginia 25701
Tel: (304) 691-8418
Fax: (304) 522-4312
E-mail: scott.sheets@dinsmore.com

*Counsel for Defendant,
John Q. Hammons Hotels Management, LLC*

{H0986579.1 }



Legal Counsel.

DINSMORE & SHOHL LLP
611 Third Avenue
Huntington, WV 25701
www.dinsmore.com

Scott K. Sheets, Esq.
Direct Dial: (304) 691-8418
Email: scott.sheets@dinsmore.com

July 20, 2015

Cathy S. Gatson
Kanawha County Judicial Building
P.O. Box 2351
111 Court Street
Charleston, WV 25301

Re: Matthew Anthony, Etc. v. John Q. Hammons Hotels Management, LLC
In the Circuit Court of Kanawha County, West Virginia
Civil Action No. 15-C-1075

Dear Ms. Gatson:

Please find enclosed for filing, *Answer of Defendant*, together with the *Certificate of Service* reflecting service of the same upon counsel of record.

Thank you for your assistance in this matter.

Sincerely,

Scott K. Sheets
SKS:lgj
Enclosure

cc: Todd Bailess/Joy B. Mega

{H0986581.1 }

PLAINTIFF: Matthew Anthony, etc.

DEFENDANT: John Q. Hammons Hotels Management, LLC

CASE NUMBER:

15-C-1075

II. TYPE OF CASE

- | | |
|--|---|
| <input checked="" type="checkbox"/> General Civil | <input type="checkbox"/> Adoption |
| <input type="checkbox"/> Mass Litigation
(as defined in T.C.R. Rule XIX(c)) | <input type="checkbox"/> Administrative Agency Appeal |
| <input type="checkbox"/> Asbestos | <input type="checkbox"/> Civil Appeal from Magistrate Court |
| <input type="checkbox"/> Carpal Tunnel Syndrome | <input type="checkbox"/> Miscellaneous Civil Petition |
| <input type="checkbox"/> Diet Drugs | <input type="checkbox"/> Mental Hygiene |
| <input type="checkbox"/> Environmental | <input type="checkbox"/> Guardianship |
| <input type="checkbox"/> Industrial Hearing Loss | <input type="checkbox"/> Medical Malpractice |
| <input type="checkbox"/> Silicone Implants | |
| <input type="checkbox"/> Other: _____ | |
| <input type="checkbox"/> Habeas corpus/Other Extraordinary Writ | |
| <input type="checkbox"/> Other - Employment Discrimination | |

III. JURY DEMAND: ☒ Yes ☐ No

CASE WILL BE READY FOR TRIAL BY (MONTH/YEAR): 7/2016

IV. DO YOU OR ANY OF YOUR CLIENTS OR WITNESSES IN THIS CASE REQUIRE SPECIAL ACCOMMODATIONS DUE TO A DISABILITY? ☐ YES ☒ NO

IF YES, PLEASE SPECIFY:

- ☐ Wheelchair accessible hearing room and other facilities
- ☐ Interpreter or other auxiliary aid for the hearing impaired
- ☐ Reader or other auxiliary aid for the visually impaired
- ☐ Spokesperson or other auxiliary aid for the speech impaired
- ☐ Other:

Attorney Name: Scott K. Sheets, Esq., (WVSB #4344)

Firm: Dinsmore & Shohl LLP

Address: 611 Third Ave., Huntington, WV 25701

Telephone: 304-529-6181

Dated: 7/20/15

Representing: John Q. Hammons
Hotels Management, LLC

☐ Plaintiff ☒ Defendants

☐ Cross-Complainant ☐ Cross-Defendant


Signature

Proceeding Without an Attorney

{H0980806.1 }

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: 12/23/2016

Trustee:

Last Date to file (Govt):

Creditor: (8597877) Matthew Anthony c/o Bailey & Glasser LLP Attn: Jonathan Marshall, Esq 209 Capitol Street Charleston, West Virginia 25301	Claim No: 204 <i>Original Filed</i> Date: 11/01/2016 <i>Original Entered</i> Date: 11/01/2016	Status: <i>Filed by:</i> CR <i>Entered by:</i> Terri Marshall <i>Modified:</i>
Amount claimed: \$0.00		

History:

Details	204-1	11/01/2016 Claim #204 filed by Matthew Anthony, Amount claimed: \$0.00 (Marshall, Terri)
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Description: (204-1) Civil Action

Remarks: (204-1) claim amount listed as "undetermined" KSB Filed 10/17/16; ECF by Claims Agent 11/1/16

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*	\$0.00
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		
Priority		
Administrative		