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Hearing Date: November 16, 2011 @ 10:00 a.m.
Objection Deadline: November 9, 2011 @ 4:00 p.m.

Counsel to The Trust Administrator For
The Jennifer Convertibles Litigation Trust

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:)	Chapter 11
JENNIFER CONVERTIBLES, INC., <i>et al.</i> ¹)	Case No. 10-13779 (ALG)
Debtors.)	(Jointly Administered)
)	
)	

**NOTICE OF TRUST ADMINISTRATOR'S SECOND (SUBSTANTIVE) OMNIBUS
OBJECTION TO CERTAIN (A) OVERSTATED CLAIMS; (B) NO LIABILITY
CLAIMS; AND (C) REJECTION DAMAGES CLAIMS**

**TO THE CLAIMANTS IDENTIFIED ON THE EXHIBITS TO THE
ATTACHED OBJECTION:**

PLEASE TAKE NOTICE that the Trust Administrator (the "Trust Administrator") for the Jennifer Convertibles Litigation Trust (the "Trust"), solely in its capacity as Trust Administrator of the above-captioned Debtors' estates (collectively, the "Debtors"), has filed its second (substantive) omnibus objection (the "Second Omnibus Objection") to certain claims pursuant to section 502(b) of the Bankruptcy Code and Bankruptcy Rule 3007, seeking entry of an order disallowing, modifying, expunging or reclassifying such claims comprised of (a) overstated claims; (b) no liability claims; and (c) rejection damages claims. **Your proof(s) of claim may be disallowed, reclassified, reduced or otherwise affected as a result of the Second Omnibus Objection. Therefore, you should read this Notice and the attached Second Omnibus Objection carefully.**

¹ The Debtors in these chapter 11 cases are: (i) Jennifer Convertibles, Inc.; (ii) Jennifer Convertibles Boylston MA, Inc.; (iii) Jennifer Chicago Ltd.; (iv) Elegant Living Management, Ltd.; (v) Hartsdale Convertibles, Inc.; (vi) Jennifer Management III Corp.; (vii) Jennifer Purchasing Corp.; (viii) Jennifer Management II Corp.; (ix) Jennifer Management V Ltd.; (x) Jennifer Convertibles Natick, Inc.; (xi) Nicole Convertibles, Inc.; and (xii) Washington Heights Convertibles, Inc.

The Second Omnibus Objection asks the United States Bankruptcy Court for the Southern District of New York to enter an order disallowing, reclassifying, modifying and expunging certain filed proofs of claim listed on Exhibits A through C to the Second Omnibus Objection. Therefore, your substantive rights may be affected.

PLEASE TAKE FURTHER NOTICE that on **November 16, 2011 at 10:00 a.m. (eastern time)**, a hearing (the “Hearing”) on the Second Omnibus Objection shall be held before the Honorable Allan L. Gropper, United States Bankruptcy Judge, in room 617 of the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004. You must attending the Hearing if you disagree with the relief requested in the Second Omnibus Objection.

PLEASE TAKE FURTHER NOTICE that if you disagree with the Second Omnibus Objection and do not want the Bankruptcy Court to disallow, reclassify, modify or expunge your proof(s) of claim, then you or your attorney must (a) file a written response (a “Response”) to the Second Omnibus Objection with the Clerk of the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004, by no later than **November 9, 2011 at 4:00 p.m. (eastern time)**; and (b) serve copies of the Response on counsel for the Trust Administrator: Kelley Drye & Warren LLP, 101 Park Avenue, New York, New York 10178, attention James S. Carr, Esq. and Jason R. Adams, Esq., so as to be received no later than **November 9, 2011 at 4:00 p.m. (eastern time)**.

PLEASE TAKE FURTHER NOTICE that your Response must contain, at a minimum, the following information:

- (a) a caption setting forth the name of the Bankruptcy Court, the name of the Debtors, the case number, and the title of objection to which the Response is directed;
- (b) the name of the claimant, his/her/its claim number, and a description of the basis for the amount of the claim;
- (c) the specific factual basis and supporting legal argument upon which the party will rely in opposing the Second Omnibus Objection;
- (d) any supporting documentation, to the extent it was not included with the proof of claim previously filed with the clerk or claims agent, upon which the party will rely to support the basis for and amounts asserted in the proof of claim; and
- (e) the name, address, telephone number, email address and fax number of the person(s) (which may be the claimant or the claimant’s legal representative) with whom counsel for the Trust Administrator should communicate with respect to the claim or the Second Omnibus Objection and who possesses authority to reconcile, settle, or otherwise resolve the objection to the disputed claim on behalf of the claimant.

