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

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

**RESPONSE OF PFF MAIN STREET CHICAGO LLC TO
TRUST ADMINISTRATOR’S SECOND (SUBSTANTIVE) OMNIBUS OBJECTION**

PFF Main Street Chicago LLC , a creditor herein, by and through its attorney, Mark J. Rose, responds to *Trust Administrator’s Second (Substantive) Omnibus Objection to Certain (A) Overstated Claims; (B) No Liability Claims; and (C) Rejection Damage’s Claims* (“Objection”), as follows:

1. On October 7, 2010, PFF Main Street Chicago LLC filed its Proof of Claim herein in the amount of \$140,431.46. A stamped-filed copy of PFF Main Street Chicago LLC’s Proof of Claim is attached hereto as Exhibit “1.”

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.

2. PFF Main Street Chicago LLC is the current owner of certain real property commonly known as the Main Street Square Shopping Center located at 2920 through 2966 Finley Road, Downers Grove, Illinois.

3. On or about December 8, 2000, PFF Main Street Chicago LLC's predecessor in interest, Richmarc Partners Phase VI Limited Partnership, as lessor, entered into a *Lease Agreement* with Jennifer Convertibles, Inc., as tenant, for the premises commonly known as 2960 Finley Road, Downers Grove, Illinois. The term of the *Lease Agreement* was for ten (10) years.

4. Jennifer Convertibles, Inc. defaulted under the *Lease Agreement* by failing to pay PFF Main Street Chicago LLC any amounts for the period covering April 1, 2010 through the present.

5. The Objection filed herein by the Trust Administrator objects to PFF Main Street Chicago LLC's Proof of Claim on the grounds that the claim is excess of the statutory cap imposed by 11 U.S.C. §502(b)(6). 11 U.S.C. §502(b)(6) limits PFF Main Street Chicago LLC's claim herein to the amount of rent reserved by the *Lease Agreement*, without acceleration, for the greater of one year, or fifteen percent (15%), not to exceed three years, of the remaining term of such lease, following the earlier of the date of the filing of the petition; and the date on which such the lessor repossessed, or the lessee surrendered, the leased property.

6. The Trust Administrator's Objection contends that PFF Main Street Chicago LLC only is entitled to a claim of \$101,580.00. Since the Objection fails to indicate how the Trust Administrator arrived at this calculation, however, the Objection is legally insufficient to enable PFF Main Street Chicago LLC to respond.

7. The name, address, email address, telephone number and facsimile number of PFF Main Street Chicago LLC's attorney herein with whom counsel for the Trust Administrator

should communicate with respect to this matter and who possesses authority to reconcile, settle or otherwise resolve the objection to the disputed claim is as follows: Mark J. Rose, Esq., 200 W. Adams St., Suite 2850, Chicago, Illinois 60606, MJRoseEsq@aol.com, 312.704.1446 (telephone), 312.704.8233 (facsimile).

WHEREFORE, PFF Main Street Chicago LLC prays for the entry of an Order allowing its Proof of Claim (Exhibit "1") as filed with the Court on October 7, 2010; and such further relief as to the Court shall seem just and proper.

Dated: Chicago, Illinois
November 9, 2011

PFF Main Street Chicago LLC

By: /s/ Mark J. Rose
Its Attorney

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