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Hearing Date: February 28, 2012 at 10:00 a.m.
Objection Deadline: February 22, 2012 at 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., *et al.*¹) Case No. 10-13779 (ALG)
)
Debtors.) (Jointly Administered)
)
)
)

**NOTICE OF TRUST ADMINISTRATOR’S THIRD (NON-SUBSTANTIVE) OMNIBUS
OBJECTION TO CERTAIN (A) WRONG DEBTOR CLAIMS; (B) DUPLICATIVE
CLAIMS; (C) SATISFIED CLAIMS; (D) REORGANIZED DEBTORS’ LIABILITY
CLAIMS; AND (E) AMENDED AND SUPERSEDED CLAIMS**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 third (non-substantive) omnibus objection (the “Third Omnibus Objection”) to certain claims pursuant to section 502(b) of the Bankruptcy Code and Bankruptcy Rule 3007, seeking entry of an order disallowing, expunging or reclassifying such claims comprised of (a) wrong debtor claims; (b) duplicative claims; (c) satisfied claims; (d) Reorganized Debtors’ liability claims; and (e) amended and superseded claims. A copy of the Third Omnibus Objection is attached to this Notice. **Your proof(s) of claim may be disallowed, reclassified, reduced or otherwith affected as a result of the Third Omnibus Objection. Therefore, you should read this Notice and the attached Third 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 Third 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 Exhibit A through E to the Third Omnibus Objection. Therefore, your substantive rights may be affected.

PLEASE TAKE FURTHER NOTICE that on February 28, 2012 at 10:00 a.m. (eastern time), a hearing (the "Hearing") on the Third 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 Third Omnibus Objection.

PLEASE TAKE FURTHER NOTICE that if you disagree with the Third 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 Third 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 February 22, 2012 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 February 22, 2012 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 this Third 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 Third Omnibus Objection

and who possesses authority to reconcile, settle, or otherwise resolve the objection to the disputed claim on behalf of the claimant.

PLEASE TAKE FURTHER NOTICE that if you or your designated attorney do not timely file and serve a Response in accordance with the above procedures and attend the Hearing, the Bankruptcy Court may enter an order granting the relief requested in the Third Omnibus Objection. If you or your designated attorney file a Response and attend the hearing, the matter will be resolved at the Hearing. Only Responses made in accordance with the above procedures, and timely filed and received by the Bankruptcy Court and counsel for the Trust Administrator will be considered by the Bankruptcy Court at the Hearing.

PLEASE TAKE FURTHER NOTICE that if you fail to file a Response in accordance with this Notice, the Bankruptcy Court may grant the relief requested in the Third Omnibus Objection without further notice or hearing.

Dated: New York, New York
January 20, 2012

KELLEY DRYE & WARREN LLP

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