

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

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U.S. BANKRUPTCY COURT  
MIDDLE DISTRICT OF TN

In re ) Chapter 11  
)  
ORECK CORPORATION, et al., ) Case No. 13-04006  
) Judge Lundin  
Debtors. ) (Jointly Administered)

**OBJECTION TO PROPOSED CURE AMOUNT**

PSJ, Inc., by and through its attorneys, Sanchez Daniels & Hoffman, LLP, hereby submits this cure objection in response to the Debtors' Notice of (i) Debtors' Intent to Assume and Assign Certain Executory Contracts, Unexpired Leases of Personal Property, And Unexpired Leases of Non-residential Real Property and (ii) Cure Amounts Related Thereto, dated June 20, 2103 (the "Notice"), and the proposed cure amount for the non-residential real property lease listed on Exhibit 1 to the Notice and respectfully states as follows:

1. On May 6, 2013, Oreck Corporation ("Oreck") and certain of its subsidiaries (collectively, the "Debtors") filed voluntary petitions for relief under Chapter 11 of Title 11 of the United States Bankruptcy Code in this Court.

2. On May 16, 2013, the Debtors filed a motion seeking this Court's approval of the sale of substantially all the Debtors' assets, free and clear of liens, claims, encumbrances, and interests (the "363 Transaction") and the assumption and approval of assignment of certain executor contacts and unexpired leases in connection with the 363 Transaction and scheduling a final hearing for approval of the 363 Transaction.

3. On June 20, 2013, this Court entered an Order, among other things, (i) approving certain procedures to govern the sale process and provide for the submission of any competing bids for substantially all of the Debtors' assets; (ii) scheduling the Sale Hearing; (iii) establishing

procedures for the assumption and assignment of certain contracts and leases by the Debtors; and  
(iv) setting a deadline for the filing of objections, if any, to the relief requested in the Motion.

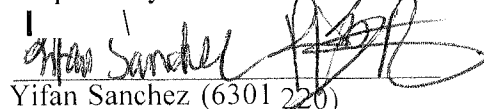
4. On June 25, 2013, counsel for Objector PSJ, Inc. received Exhibit 1 to the Notice listing the contacts and leases that the Debtors may potentially assume and assign. Exhibit 1 also contains the proposed cure amounts in connection with the assumption and assignment of the contracts and leases. Line Number 899 on Exhibit 1 is the commercial lease between Objector PSJ, Inc. and Oreck HomeCare, LLC for Store No. 117 located at Woodfield Corners, 110 East Golf Road, Schaumburg, IL 60173 (the "Woodfield Corners Lease"). The proposed cure amount for the Woodfield Corners Lease is \$0 ("the Cure Amount").

5. The Woodfield Corners Lease expires on January 31, 2014. Objector PSJ, Inc. respectfully objects to the Cure Amount. On the date of the filing of the Petition, Debtor Oreck HomeCare, LLC was indebted to Objector PSJ, Inc. in the total amount of \$9,962.32, representing rent, tax, insurance, and common area estimate under the Woodfield Corners Lease for the months of April and May 2013.

WHEREFORE, Objector PSJ, Inc. respectfully requests that the Court enter an order requiring that the Debtors pay no less than \$9,962.32 to Objector PSJ, Inc. with respect to the unpaid amounts due under the Lease.

Date: July 1, 2013

Respectfully submitted



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