

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION  
[www.flmb.uscourts.gov](http://www.flmb.uscourts.gov)

In re:

TAYLOR BEAN & WHITAKER  
MORTGAGE CORP.,

Case No. 3:09-bk-07047-JAF  
Chapter 11 Case

Debtor.

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**EIGHTEENTH OMNIBUS OBJECTION TO CLAIMS**  
(Non TBW Employees)

**IMPORTANT NOTICE TO CREDITORS:  
THIS IS AN OBJECTION TO YOUR CLAIM**

**This objection seeks to disallow certain claims. Please read this objection carefully to identify which claim is objected to and what disposition of your claim is recommended.**

**If you disagree with the objection or the recommended treatment, you must file a written response WITHIN 30 DAYS from the date of service stated in this objection, explaining why your claim should be allowed as filed, and you must mail a copy to the undersigned attorneys OR YOUR CLAIM MAY BE DISPOSED OF IN ACCORDANCE WITH THE RECOMMENDATION IN THIS OBJECTION.**

**Any written response must contain the case name, case number, and must be filed with the Clerk of the United States Bankruptcy Court, Bryan Simpson United States Courthouse, 300 North Hogan Street, Suite 3-350, Jacksonville, FL 32202 with a copy to Debi Evans Galler, Esq., Berger Singerman, P.A., 200 South Biscayne Blvd., Suite 1000, Miami, FL 33131.**

The Official Committee of Unsecured Creditors (the “Committee”), for and on behalf of the estate of Taylor, Bean & Whitaker Mortgage Corp. (the “Debtor” or “TBW”) (the Committee, together with the Debtor or TBW, will be referred to as the “Movant”), pursuant to the *Order Granting Motion for the Official Committee of Unsecured Creditors for Derivative Standing to Prosecute Litigation in the Name of the Debtor* [D.E. # 1020] and the *Notice of Sixth Amendment to the Colorable Actions List filed Pursuant to the Order Granting Motion of the Official Committee of*

*Unsecured Creditors for Derivative Standing to Prosecute Certain Actions in the Name of the Debtor, Adding Claims Against Certain Entities and Individuals* [D.E. # 3272]<sup>1</sup>, along with and pursuant to Federal Rule of Bankruptcy Procedure 3007 and Local Rule 3007-1, hereby files this objection (the “Objection”) to the claims listed on the attached **Exhibit “A”** as follows:

**Exhibit “A”:** The Movant objects to each claim set forth on Exhibit “A” on the basis that the claims are being made by non TBW employees, including but not limited to former employees of TBW that were terminated by TBW prior to August 5, 2009 in the ordinary course of business, persons for which TBW has no corresponding record of employment, and persons employed by non-TBW affiliates who were terminated and are not covered by the WARN Act Settlement. Accordingly, these claims are not due and owing by TBW and the Movant seeks to disallow each claim on Exhibit A in its entirety.

The Exhibit attached hereto lists the claims being objected to by the Movant, with the specific grounds and reasons for the Movant’s objection, and the requested disposition of such claims, as set forth above.

**All claimants that have received this Objection should locate their names and claims on the attached Exhibit, which names are listed alphabetically.**

The Movant reserves the right to amend any objection to any claim set forth on Exhibits “A”, to object on additional grounds not set forth in Exhibit “A”, and/or to object to any further claims not presently set forth on this Exhibit. By filing this Objection, the Movant does not waive the right to file further objections or to pursue avoidance actions or other causes of action. To discuss this Objection further, you may contact us by telephone at **954-712-5181**.

**WHEREFORE**, the Movant respectfully request that the Court (1) dispose of the claims set forth on the Exhibit “A”, as recommended by the Movant, on the grounds set forth in this Objection

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<sup>1</sup> On the Effective Date of the *Third Amended and Restated Joint Plan of Liquidation of the Debtors and the Official Committee of Unsecured Creditors* (the “Plan”), as that term is defined in the Plan, the post-confirmation plan trust (“Plan Trust”) defined by and provided for in the Plan shall be deemed substituted as the moving party in this Objection (as defined herein) pursuant to Article 6(F) of the Plan. The Court entered an Order confirming the Plan on July 21, 2011

and on the attached Exhibit, without prejudice to the rights of the Movant or other interested parties to file further objections or to pursue avoidance actions or other causes of action, and (2) grant such other and further relief as is just and appropriate.

**I HEREBY CERTIFY** that I am admitted to the Bar of the United States District Court for the Middle District of Florida and I am in compliance with the additional qualifications to practice in this court set forth in Local Rule 2090-1(a).

Dated: August 9, 2011

Respectfully submitted,

BERGER SINGERMAN, P.A.  
*Counsel for the Official Committee of  
Unsecured Creditors*  
200 South Biscayne Blvd., Suite 1000  
Miami, FL 33131  
Telephone: (305) 755-9500  
Facsimile: (305) 714-4340

By: /s/ Alisa Paige Mason  
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Florida Bar No.985236  
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Florida Bar No. 084461  
[pmason@bergersingerman.com](mailto:pmason@bergersingerman.com)

**In re: Taylor, Bean & Whitaker Mortgage Corp., et al.**  
**Jointly Administered Under Case No. 3:09-bk-07047-JAF**  
**OMNIBUS 18: EXHIBIT A**

Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Reason For Proposed Handling
1 BASTIAN, TIFFANY JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	3213	\$9,600.00	(P)	TERMINATION DATE FROM TBW PRIOR TO AUGUST 5, 2009
2 BESS, TESIA C JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	2349	\$5,214.25	(P)	NOT IDENTIFIED AS TBW EMPLOYEE IN THE APPLICABLE PERIOD
3 BINKOWSKY, JAMIE JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	3154	\$8,975.34	(P)	NOT IDENTIFIED AS TBW EMPLOYEE IN THE APPLICABLE PERIOD
4 CAREY, NIC A JACK A RAISNER ESQ & RENE ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVENUE 29TH FLOOR NEW YORK, NY 10016	09-07047	3131	\$5,862.53	(P)	TERMINATION DATE FROM TBW PRIOR TO AUGUST 5, 2009
5 CHESHIRE, MATTHEW JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	1848	\$9,000.00	(P)	NOT IDENTIFIED AS TBW EMPLOYEE IN THE APPLICABLE PERIOD
6 COSTELLA, MARIE JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	3169	\$10,273.97	(P)	NOT IDENTIFIED AS TBW EMPLOYEE IN THE APPLICABLE PERIOD

\*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

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7 CZAJKOWSKI, THOMAS F JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	3215	\$8,100.00	(P)	TERMINATION DATE FROM TBW PRIOR TO AUGUST 5, 2009
8 DEJESUS, CARMEN IRIS JACK A RAISNER ESQ & RENE ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVENUE 29TH FLOOR NEW YORK, NY 10016	09-07047	3116	\$4,931.51	(P)	NOT IDENTIFIED AS TBW EMPLOYEE IN THE APPLICABLE PERIOD
9 DEMRON, JOSEPH JACK A RAISNER ESQ & RENE ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVENUE 29TH FLOOR NEW YORK, NY 10016	09-07047	3141	\$7,200.00	(P)	NOT IDENTIFIED AS TBW EMPLOYEE IN THE APPLICABLE PERIOD
10 DENNI, LORI JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	2717	\$10,950.00 \$1,800.00	(P) (U)	NOT IDENTIFIED AS TBW EMPLOYEE IN THE APPLICABLE PERIOD
11 DODSON, TRACIE JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	2329	\$4,726.03	(P)	NOT A TBW EMPLOYEE; WAS EMPLOYED BY AN AFFILIATE
12 DUNSWORTH, JANICE G JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	2947	\$4,931.51	(P)	TERMINATION DATE FROM TBW PRIOR TO AUGUST 5, 2009

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13 ELHARD, ERIM J JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	3196	\$7,910.96	(P)	NOT IDENTIFIED AS TBW EMPLOYEE IN THE APPLICABLE PERIOD
14 FINLEY, DIAINE J JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	2452	\$7,191.78	(P)	TERMINATION DATE FROM TBW PRIOR TO AUGUST 5, 2009
15 GANDY, BRAD JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	1852	\$9,300.00	(P)	NOT IDENTIFIED AS TBW EMPLOYEE IN THE APPLICABLE PERIOD
16 HEMELRICK, JAY H JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	2768	\$9,000.00	(P)	NOT A TBW EMPLOYEE; WAS EMPLOYED BY AN AFFILIATE
17 HOLT, JEANA E JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	3221	\$9,900.00	(P)	TERMINATION DATE FROM TBW PRIOR TO AUGUST 5, 2009
18 HUFF, ROBERT JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	2151	\$10,950.00 \$3,926.71	(P) (U)	NOT A TBW EMPLOYEE; WAS EMPLOYED BY AN AFFILIATE

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19 JOHNSON, KERI JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	3216	\$8,400.00	(P)	TERMINATION DATE FROM TBW PRIOR TO AUGUST 5, 2009
20 KOWALCZIK, ASHLEY JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	2972	\$7,441.00	(P)	NOT IDENTIFIED AS TBW EMPLOYEE IN THE APPLICABLE PERIOD
21 KROGER, ANDREA JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	3194	\$7,530.82	(P)	NOT IDENTIFIED AS TBW EMPLOYEE IN THE APPLICABLE PERIOD
22 LORENE, CHRISTOPHER JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	2041	\$10,950.00 \$1,584.25	(P) (U)	NOT IDENTIFIED AS TBW EMPLOYEE IN THE APPLICABLE PERIOD
23 MACGREGOR, CAMERON JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	2810	\$10,950.00 \$390.00	(P) (U)	TERMINATION DATE FROM TBW PRIOR TO AUGUST 5, 2009
24 MALDONADO, PATRICIA JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	3212	\$9,900.00	(P)	TERMINATION DATE FROM TBW PRIOR TO AUGUST 5, 2009

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25 MATRRIST, AARON JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	2529	\$8,630.14	(P)	NOT IDENTIFIED AS TBW EMPLOYEE IN THE APPLICABLE PERIOD
	TAYLOR, BEAN & WHITAKER MORTGAGE CORP.				
26 MCDANIEL, CHRISTOPHER G JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	2250	\$10,950.00 \$40,008.90	(P) (U)	TERMINATION DATE FROM TBW PRIOR TO AUGUST 5, 2009
	TAYLOR, BEAN & WHITAKER MORTGAGE CORP.				
27 MEADOWS, ABIGAIL JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	2823	\$2,250.00	(P)	NOT A TBW EMPLOYEE; WAS EMPLOYED BY AN AFFILIATE
	TAYLOR, BEAN & WHITAKER MORTGAGE CORP.				
28 PAPP, DEBORA L JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	2099	\$10,950.00 \$2,817.12	(P) (U)	NOT IDENTIFIED AS TBW EMPLOYEE IN THE APPLICABLE PERIOD
	TAYLOR, BEAN & WHITAKER MORTGAGE CORP.				
29 PAQUETTE, MARLEEN J JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	1958	\$9,827.22	(P)	NOT IDENTIFIED AS TBW EMPLOYEE IN THE APPLICABLE PERIOD
	TAYLOR, BEAN & WHITAKER MORTGAGE CORP.				
30 PEARSON, TONYA JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	2491	\$7,910.96	(P)	NOT IDENTIFIED AS TBW EMPLOYEE IN THE APPLICABLE PERIOD
	TAYLOR, BEAN & WHITAKER MORTGAGE CORP.				

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31 SADDLER, RENEE JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	2872	\$9,000.00	(P)	NOT IDENTIFIED AS TBW EMPLOYEE IN THE APPLICABLE PERIOD
32 SANDIGO, JIAN J JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	2532	\$8,630.14	(P)	NOT A TBW EMPLOYEE; WAS EMPLOYED BY AN AFFILIATE
33 SIMONS, CRAIG JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	1992	\$10,684.93	(P)	NOT IDENTIFIED AS TBW EMPLOYEE IN THE APPLICABLE PERIOD
34 STREIBIG, ANGELA JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	2493	\$7,992.33	(P)	TERMINATION DATE FROM TBW PRIOR TO AUGUST 5, 2009
35 TRINIDAD, TONY JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	2204	\$10,950.00 \$7,543.15	(P) (U)	NOT IDENTIFIED AS TBW EMPLOYEE IN THE APPLICABLE PERIOD
36 TURNER, NOEL JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	2962	\$10,950.00 \$24,050.00	(P) (U)	NOT IDENTIFIED AS TBW EMPLOYEE IN THE APPLICABLE PERIOD

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37 WEISKI, ANDREW JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	3189	\$10,950.00 \$15,145.89	(P) (U)	NOT IDENTIFIED AS TBW EMPLOYEE IN THE APPLICABLE PERIOD
		TAYLOR, BEAN & WHITAKER MORTGAGE CORP.			
38 WINTERS, LISA JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	2980	\$7,500.00	(P)	NOT IDENTIFIED AS TBW EMPLOYEE IN THE APPLICABLE PERIOD
		TAYLOR, BEAN & WHITAKER MORTGAGE CORP.			
39 YORK, TERRY JACK A RAISNER ESQ & RENE S ROUPINIAN ESQ OUTTEN & GOLDEN LLP 3 PARK AVE 29TH FL NEW YORK, NY 10016	09-07047	2108	\$10,950.00 \$3,022.60	(P) (U)	NOT IDENTIFIED AS TBW EMPLOYEE IN THE APPLICABLE PERIOD
		TAYLOR, BEAN & WHITAKER MORTGAGE CORP.			
<b>Totals:</b>			\$337,315.42 \$100,288.62	(P) (U)	

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