

PLEASE CAREFULLY REVIEW THIS OBJECTION AND THE ATTACHMENTS HERETO TO DETERMINE WHETHER THIS OBJECTION AFFECTS YOUR CLAIM.

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

-----X
:

In re : Chapter 11

:

UBI Liquidating Corp., : Case No. 10-13005 (KJC)

:

Debtor. : **Hearing Date: July 25, 2013 at 2:00 p.m. (EDT)**

: **Response Deadline: June 11, 2013 at 4:00 p.m. (EDT)**

-----X

**NOTICE OF LIQUIDATING TRUSTEE'S TENTH
OMNIBUS OBJECTION TO CLAIMS (SUBSTANTIVE)**

PLEASE TAKE NOTICE that, on May 28, 2013, Stephen Feldman, in his capacity as trustee (the "Liquidating Trustee") of the UBI Liquidating Trust, as the successor to UBI Liquidating Corp. and its affiliated debtors, and the Liquidating Trust Committee (the "Committee"), by and through their attorneys, Richards, Layton & Finger, P.A. and Cooley LLP, filed the *Tenth Omnibus Objection of the Liquidating Trustee to Certain Overstated Claims, Redundant Claims, and Improperly Classified Claims (Substantive)* (the "Objection"), which seeks to alter the rights of certain claimants by disallowing, reducing or reclassifying their claims.

THE OBJECTION SEEKS TO ALTER YOUR RIGHTS. THEREFORE, YOU SHOULD READ THE OBJECTION AND THE EXHIBITS THERETO CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE. **EXHIBITS A - C ATTACHED TO THE PROPOSED ORDER TO THE OBJECTION LISTS ALL CLAIMS THAT ARE THE SUBJECT OF THE OBJECTION.**

PLEASE TAKE FURTHER NOTICE that a hearing on the Objection will be held before The Honorable Kevin J. Carey, United States Bankruptcy Court for the District of

Delaware, 824 Market Street, 5th Floor, Courtroom No. 5, Wilmington, DE 19801 (the "Bankruptcy Court") on **July 25, 2013 at 2:00 p.m. (Eastern Daylight Time)**.

PLEASE TAKE FURTHER NOTICE that if the holder of a claim that is the subject of the Objection wishes to respond to the Objection, the holder must file and serve a written response so that it is actually *received* no later than **June 11, 2013 at 4:00 p.m. (Eastern Daylight Time)** by the undersigned counsel to the Liquidating Trustee and the Committee. **The undersigned counsel to the Liquidating Trustee and the Committee encourage any claimant wishing to respond to the Objection to contact such counsel prior to filing a response to the Objection to determine whether a mutually agreeable resolution can be reached.**

PLEASE TAKE FURTHER NOTICE that responses to the Objection must contain, at minimum, the following: (i) a caption setting forth the name of the Bankruptcy Court, the case number and the title of the Objection; (ii) the name of the claimant and description of the basis for the amount of the claimant's claim(s); (iii) a concise statement setting forth the reasons why such claim(s) should not be disallowed for the reasons set forth in the Objection, including but not limited to the specific factual and legal bases upon which the claimant will rely in opposing the Objection; (iv) all documentation or other evidence of the claim(s), to the extent not included with the proof of claim previously filed with the Bankruptcy Court, upon which the claimant will rely in opposing the Objection at the hearing; (v) the addresses to which any reply to a response should be directed; and (vi) the name, address, and telephone number of the person (which may be the claimant or his/her/its legal representative) possessing final authority to reconcile, settle, or otherwise resolve the claim on behalf of the claimant.

IF NO RESPONSES TO THE OBJECTION ARE TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED IN THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: May 28, 2013
Wilmington, Delaware

/s/ Andrew C. Irgens

Mark D. Collins (No. 2981)
Paul N. Heath (No. 3704)
L. Katherine Good (No. 5101)
Andrew C. Irgens (No. 5193)
RICHARDS, LAYTON & FINGER, P.A.
One Rodney Square
920 North King Street
Wilmington, Delaware 19801
Telephone: 302-651-7700
Facsimile: 302-651-7701

Counsel to the Liquidating Trustee

- and -

Lawrence C. Gottlieb (*pro hac vice*)
Michael Klein (*pro hac vice*)
COOLEY LLP
1114 Avenue of the Americas
New York, NY 10036
Telephone: 212-479-6000
Facsimile: 212-479-6575

Counsel to the Liquidating Trust Committee