

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

In re:	x	Chapter 11
URBAN BRANDS, LLC, <i>et al.</i> ,	:	Case No 10-13005 (KJC)
Debtors.	:	(Jointly Administered)
	:	
	x	

**JACKSON METROCENTER MALL LTD’S LIMITED OBJECTION
TO CURE CLAIM AMOUNT (DOCKET NOS. 34 and 143)**

Jackson Metrocenter Mall, LTD, successor-in-interest to Coyote Mississippi Malls, LCC, (the “Landlord”), respectfully submits this limited objection (the “Objection”) to the assumption of a certain lease (the “Lease”) between the Landlord and Large Apparel of Mississippi, Inc., one of the Debtors. In support of its limited Objection, Landlord states as follows:

1. Urban Brands and its affiliated debtors (collectively, the “Debtors”) filed a motion seeking, *inter alia*, approval of certain notice procedures for determining cure amounts for executory contracts and leases to be assigned (the “Motion”) (Docket No. 34).

2. On October 4, 2010, this Court entered an order approving the Motion and setting October 19, 2010, as the deadline to object to the proposed cure amount for the Lease (the “Order”) (Docket No. 143). A copy of the relevant portion of the cure schedule from the Order (the “Cure Schedule”) is attached hereto as **Exhibit A**.

3. The Cure Schedule identifies the cure amount due to the Landlord as \$5,453.89.

4. As of the date of this Objection, the Landlord has not received post-petition rent due under the Lease.

5. The Landlord objects to the cure amount set forth in the Cure Schedule and states that approximately \$12,918.43 is the proper cure amount, which must be paid if the Lease is to be assumed. This amount is comprised of: (i) an administrative priority claim pursuant to

11 U.S.C. §§ 365 (d)(3), 503(b)(1) and 507(a)(2) in the approximate amount of \$3,486.36¹ for unpaid rent due October 1, 2010; and (ii) \$9,450.07 in rent due as of September 21, 2010 (the “Petition Date”). Attached hereto as **Exhibit B** is an accounting for the unpaid rent owed to the Landlord.

6. The Landlord does not contest the Debtors’ right to assume and assign the Lease. However, if the Lease is going to be assumed, the cure amounts proposed by the Debtors are insufficient to cure all defaults as required under 11 U.S.C. § 365(b)(1)(A).

7. Therefore, the Landlord objects to the assumption and assignment of the Lease in the absence of payment of all amounts owed under the Lease. The current balance of these amounts owed is \$12,918.43, which exceeds the \$5,453.89 cure amount proposed by the Debtors by \$7,464.54.

8. The Landlord reserves the right to amend this Objection to the extent that the Landlord determines that any additional amount is due under the Lease, including but not limited to additional post-petition rent.

¹ The October rent is calculated as \$807.20 in a base cost, plus a percent rent related to the Debtors’ September sales.

WHEREFORE, the Landlord respectfully requests that this Court enter an order: (i) finding that the Debtors' cure obligation pursuant to 11 U.S.C. § 365(b)(1)(A) is \$12,918.43; (ii) conditioning the Debtors' assumption of the Lease upon the payment of all amounts due under 11 U.S.C. § 365(b)(1)(A); and (iii) granting such further relief as this Court deems just.

Dated: October 15, 2010

JACKSON METROCENTER MALL, LTD.

By: /s/ Zane L. Zielinski
One of its attorneys

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CERTIFICATE OF SERVICE

I, Zane L. Zielinski, an attorney, state that on **October 15, 2010**, a copy of the foregoing **Jackson Metrocenter Mall, LTD's Limited Objection to Cure Claim Amount (Docket Nos. 34 and 143)** was filed electronically. Notice of this filing will be sent to all parties listed on the attached Electronic Mail Notice List by operation of the Court's CM/ECF system. In addition, copies were served via facsimile and U.S. mail upon the parties listed on the attached Service List:

By: / s/ Zane L. Zielinski

SERVICE LIST – CURE OBJECTION NOTICE PARTIES

In re Urban Brands, LLC, et al.

Case No. 10-13005 (KJC)

**VIA FACSIMILE, U.S. MAIL
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Mailing Information for Case 10-13005-KJC

Electronic Mail Notice List

The following is the list of **parties** who are currently on the list to receive e-mail notice/service for this case.

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