

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION

IN RE:)	Chapter 7
)	
CLARKESVILLE LIQUIDATION INC.,)	
f/k/a Scovill Fasteners Inc., <i>et al.</i> ,)	Case No. 11-21650-reb
)	
Debtors.)	Jointly Administered
)	

**MOTION FOR ORDER ESTABLISHING
A DEADLINE AND PROCEDURES FOR FILING REQUESTS
FOR ALLOWANCE OF CHAPTER 11 ADMINISTRATIVE EXPENSES AND
APPROVING THE FORM AND MANNER OF NOTICE THEREOF**

COMES NOW, S. Gregory Hays, as Chapter 7 Trustee (the “Trustee”) for Debtors Clarkesville Liquidation Inc. f/k/a Scovill Fasteners Inc., *et al.* (collectively, the “Debtors”), and hereby moves this Court for entry of an Order fixing the last date and time for the filing of chapter 11 administrative expense claims (“Chapter 11 Administrative Claims”) against the Debtors’ estates as November 15, 2011 and approving the forms of notice and procedures related thereto, and in support thereof respectfully states as follows:

BACKGROUND

1. On April 19, 2011 (the “Petition Date”), the Debtors filed their voluntary petitions for relief under Chapter 11 of the Bankruptcy Code (the “Code”). On July 12, 2011, these cases were converted to cases under Chapter 7 of the Code and S. Gregory Hays was appointed as Chapter 7 Trustee.

2. Several other deadlines for filing different categories of claims in this case have previously been set. The Court established May 25, 2011 as the deadline for filing section 503(b)(9) claims [Docket No. 68]. The Court established September 30, 2011 as the deadline for

¹ The Debtors include Scovill Fasteners Inc., Rau Fastener Company, L.L.C., Scomex, Inc., PCI Group, Inc., and Scovill, Inc.

filing claims relating to damages from the rejection of all retiree benefits contracts, if such damages were incurred from the period of April 19, 2011 through July 26, 2011 [Docket No. 259]. The Clerk of the Court set a general claims bar date for November 30, 2011 and a governmental claims bar date of November 30, 2011 [Docket No. 264].

JURISDICTION AND VENUE

3. This Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This matter is core pursuant to 28 U.S.C. § 157(b)(2)(A) and (O). Venue is proper in this Court pursuant to 28 U.S.C. § 1408.

REQUESTED RELIEF

4. The Trustee requests that each person or entity (including, without limitation, each individual, partnership, joint venture, corporation, estate, trust and governmental unit) that asserts a chapter 11 administrative claim or expense against the Debtors that arose on or after April 19, 2011 but before July 12, 2011 be required to file an original, written administrative expense request, which substantially conforms to the form attached as Exhibit "A" hereto (the "**Request Form**").

5. The Trustee further requests that the Court enter an order (a) setting November 15, 2011 as the date by which all parties in interest must file requests for Chapter 11 Administrative Claims under section 503(a) of the Code (the "**Chapter 11 Administrative Bar Date**") with the Court (as defined below); and (b) approving the proposed Bar Date Notice (as defined below) and claims form. These deadlines shall not apply to any claim for which a separate deadline has been or will be fixed by this Court.

A. The Chapter 11 Administrative Bar Date

6. The Chapter 11 Administrative Bar Date allows parties in interest ample time to file requests for Chapter 11 Administrative Claims arising during the course of the Debtors' chapter 11 cases. Based on the notice procedures set forth below, the setting of this deadline will give all creditors and governmental units ample opportunity to prepare and file Chapter 11 Administrative Claims.

B. Proposed Claims Procedures

7. The claims procedures embodied in the Bar Date Order (described below) are fair and equitable and in compliance with the Bankruptcy Code.

8. Pursuant to the proposed order annexed hereto as Exhibit "C" (the "**Bar Date Order**"), each person or entity (including, without limitation, each individual, partnership, joint venture, corporation, estate, trust and governmental unit) that asserts a Chapter 11 Administrative Claim under section 503 of the Code must file an administrative expense request by November 15, 2011.

9. The Trustee requests that the Court order that each person or entity who believes they are entitled to a Chapter 11 Administrative Claim must file a Request Form so as to be received on or before the Bar Date by the Clerk of the Court (as defined below). The original Request Form should be sent or hand-delivered to the Clerk of the Court.

10. The Trustee requests that the Court order that all Chapter 11 Administrative Claims be deemed timely filed only if actually received by the Clerk of the Court on or before the Bar Date. The Trustee further requests that the Bar Date apply to all known and unknown creditors.

11. The Trustee also requests that the following persons or entities **not** be required to file a Request Form on or before the Bar Date:

- a. any holder of a Chapter 11 Administrative Claim that has heretofore been allowed by order of this Court;
- b. any person or entity whose claim has already been paid by the Debtors or the Trustee;
- c. any professional who has previously had its fees and expenses allowed by this Court.

12. The Trustee respectfully submits that these procedures provide a fair and equitable opportunity for creditors, governmental units and other interested parties to assert Chapter 11 Administrative Claims against the Debtors. Further, these procedures are designed to preserve the value of the Debtors' estates, and ensure that the Trustee can maximize the processing of claims for the ultimate benefit of creditors. Accordingly, the Bar Date Order, and the procedures set forth therein, should be approved.

C. Request Form

13. The Trustee has prepared the Request Form tailored for use in this case by parties asserting Chapter 11 Administrative Claims, and requests that the Court approve same for use in these cases. In accordance with the proposed Bar Date Order, each Chapter 11 Administrative Expense Claim submitted must (i) be written in the English language; (ii) be denominated in lawful currency of the United States as of the Petition Date; (iii) conform substantially with the sample Request Form; (iv) indicate the Debtor against which the creditor is asserting a claim (and if a creditor asserts a claim against more than one Debtor or has claims against more than one Debtor, a separate proof of claim must be filed with respect to each Debtor); (v) include supporting documentation (if voluminous, the creditor must attach a summary) or an explanation

as to why such documentation is not available; and (vi) be executed by the individual to whom service of any papers relating to such claim shall be directed.

D. Failure to File

14. The Trustee proposes that, in accordance with Bankruptcy Rule 3003(c)(2), any holder of a Chapter 11 Administrative Claim against the Debtors who is required, but fails, to file a Request Form in accordance with the Bar Date Order on or before the Bar Date shall be forever barred, estopped, and enjoined from asserting such claim against the Debtors (or filing a proof of claim with respect thereto), and the Debtors' estates shall be forever discharged from any and all indebtedness or liability with respect to such claim, and such holder shall not be treated as a creditor with respect to such claim for purposes of voting and distribution and shall not receive further notices regarding such claim.

E. Notice of the Bar Date

15. Pursuant to Bankruptcy Rule 2002(a)(7), the Trustee proposes to provide notice of the Bar Date to the notice parties substantially in the form attached hereto as Exhibit "B" (the "Bar Date Notice").

16. The Bar Date Notice (together with a copy of the Request Form) will be sent to:

- a) the Office of the United States Trustee for the Northern District of Georgia;
- b) all persons or entities that have requested notice of the proceedings in these cases;
- c) all creditors and other known holders of claims as of the date of entry of the Bar Date Order, including all persons or entities listed on the Schedules at the addresses stated therein;
- d) all parties to executory contracts and unexpired leases of the Debtors;
- e) any other required governmental units;
- f) all persons and entities listed on the Debtors' Master Service List as of the date of the entry of the Bar Date Order; and

g) such additional persons and entities as deemed appropriate by the Court and Debtors.

17. The proposed Bar Date Notice notifies the parties of the Bar Date and contains information regarding who must file a Chapter 11 Administrative Claim, the procedure for filing a Chapter 11 Administrative Claim and the consequences of failure to timely file Chapter 11 Administrative Claim. The Trustee requests that the Court approve the proposed form of the Bar Date Notice and the Debtors' use thereof.

18. Therefore, the Trustee respectfully requests that the Court find that the Trustee's proposed procedures regarding the Bar Date Notice shall be deemed good, adequate and sufficient notice.

NOTICE

19. Notice of this Motion has been served on: (a) the Office of the United States Trustee, and (b) those parties requesting notice pursuant to Bankruptcy Rule 2002 in these cases. In light of the nature of relief requested herein, the Trustee submits that no other or further notice is required.

CONCLUSION

WHEREFORE, based upon the foregoing, the Trustee respectfully requests the entry of an order substantially in the form attached hereto as Exhibit "C", authorizing the relief requested herein, and granting such other and further relief as is just.

Dated: September 21, 2011

GREENBERG TRAUIG, LLP

/s/ John D. Elrod

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Atlanta, Georgia 30327
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Counsel for S. Gregory Hays, Chapter 7 Trustee

EXHIBIT A

UNITED STATES BANKRUPTCY COURT, NORTHERN DISTRICT OF GEORGIA

**ADMINISTRATIVE
EXPENSE REQUEST**

**CHAPTER 11
ADMINISTRATIVE EXPENSE
BAR DATE: NOVEMBER 15,
2011 at 4:30 P.M. ET**

Name of Debtor	Case Number
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NOTE: Pursuant to an Order of the Bankruptcy Court in the above-referenced chapter 7 case (see dock. no. ____) (the "Bar Date Order"), to have claims allowed as chapter 11 administrative expense claims (other than as described in the Bar Date Order and on page 2 hereof) that arose or after April 19, 2011 to and including July 12, 2011 (the "Chapter 11 Administrative Expense Period"), this form must be filed with Clerk, United States Bankruptcy Court Northern District of Georgia, Federal Building, 121 Spring Street SE, Room 120, Gainesville, GA 30501 on or before 4:30 p.m. Eastern Time on the Administrative Expense Request Bar Date (November 15, 2011) in order to be deemed timely filed.

Name and address of Creditor (The person or other entity to whom the debtor owes money or property):	<input type="checkbox"/> Check box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars. <input type="checkbox"/> Check box if you have never received any notices from the bankruptcy court in this case. <input type="checkbox"/> Check box if the address differs from the address on the envelope sent to you by the court.
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THIS SPACE IS FOR COURT USE ONLY

Telephone No. of Creditor:

Creditor Tax ID #:	Account or other number by which Creditor identifies Debtor:	Check here if this claim <input type="checkbox"/> replaces a previously filed claim, dated: <input type="checkbox"/> amends
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1. Basis for Claim <input type="checkbox"/> Goods sold <input type="checkbox"/> Services performed <input type="checkbox"/> Money loaned <input type="checkbox"/> Personal injury/wrongful death <input type="checkbox"/> Taxes <input type="checkbox"/> Other _____	<input type="checkbox"/> Retiree benefits as defined in 11 U.S.C. § 1114(a) <input type="checkbox"/> Wages, salaries and compensation (fill out below) Last four digits of SS #: _____ Unpaid compensations for services performed from _____ to _____ (date) (date)
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2. Date debt was incurred:	3. If court judgment, date obtained:
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4. Total Amount of Claim at Time Case Filed: \$ _____ <input type="checkbox"/> Check this box if your claim includes interest or other charges in addition to the principal amount of the claim. Attach itemized statement of all interest or additional charges.

5. Brief Description of Claim (attach any additional information):

6. Offsets, Credits and Setoffs <input type="checkbox"/> All payments made on this claim by the Debtor have been credited and deducted from the amount claimed hereon <input type="checkbox"/> This claim is not subject to any setoff or counterclaim <input type="checkbox"/> This claim is subject to any setoff or counterclaim as follows:	7. Assignment: <input type="checkbox"/> If the claimant has obtained this claim by assignment, a copy is attached hereto.
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8. Supporting Documents: Attach copies of supporting documents. DO NOT SEND ORIGINAL DOCUMENTS. 9. Date-Stamped Copy: To receive an acknowledgment of the filing of your claim, enclose a stamped, self-addressed envelope and copy of this proof of claim.	THIS SPACE IS FOR COURT USE ONLY
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Date	Sign and print the name and title, if any, of the creditor or other person authorized to file this claim (attach copy of power of attorney, if any):
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Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571.

INSTRUCTIONS FOR FILING ADMINISTRATIVE EXPENSE REQUEST FORM

The instructions and definitions below are general explanations of the law. In particular types of cases or circumstances there may be exceptions to the general rules.

Debtors:

Clarksville Liquidation Inc. f/k/a Scovill Fasteners Inc., Scovill, Inc., Scomex, Inc., PCI Group, Inc. and Rau Fastener Company, L.L.C.

Chapter 11 Administrative Expense Claim:

Administrative expense claims arising on or after April 19, 2011 to and including July 12, 2011 (the "Administrative Expense Period") other than (a) 503(b)(9) Claims; (b) those asserting claims for fees and expenses of Professionals arising or accruing after the Petition Date which have already been allowed by Order of the Court; (c) those who have already filed a motion with the Court seeking payment of an Administrative Expense Claim that accrued during the Administrative Expense Period; (d) those who have asserted an Administrative Expense Claim for the Administrative Expense Period against the Debtors and have already been paid; (e) fees payable to the Office of the United States Trustee pursuant to 28 U.S.C. §1930; (f) Administrative Expense Claims of governmental units that are subject to Bankruptcy Code section 503(b)(1)(D); and (g) Administrative Expense Claims arising after the Chapter 11 Administrative Expense Period..

Chapter 11 Administrative Expense Bar Date:

By Order of the United States Bankruptcy Court for the Northern District of Georgia, all Chapter 11 Administrative Expense Request Forms must be filed so as to be received at the address set forth below no later than November 15, 2011 at 4:30 p.m. Eastern Time.

503(b)(9) Claim:

503(b)(9) Claims shall mean claims arising under section 503(b)(9) of the Bankruptcy Code against a Debtor, which were to have been filed against the Debtors on or before the 503(b)(9) claim bar date, which has passed.

Please read this Administrative Expense Request Form carefully and fill it in completely and accurately.

Print legibly. Your claim may be disallowed if it cannot be read and understood.

You must specify which of the Debtors you are asserting a claim against and their appropriate case number.

This Administrative Expense Request Form must be completed in English. The amount of any Administrative Expense Request Form must be denominated in United States currency.

Attach additional pages if more space is required to complete this Administrative Expense Request Form.

This form should only be used by a claimant asserting a Chapter 11 Administrative Expense Claim, as defined above.

This Administrative Expense Request Form should be filed with the Clerk, United States Bankruptcy Court Northern District of Georgia, Federal Building, 121 Spring Street SE, Room 120, Gainesville, GA 30501 (the "Bankruptcy Court Clerk").

To be considered timely filed, this Administrative Expense Request Form must be filed before 4:30 p.m. prevailing Eastern Time on November 15, 2011 and must include appropriate documents/materials establishing the claimants entitlement to an allowed Administrative Expense Claim and the amount of the asserted claim.

EXHIBIT B

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION**

IN RE:)	Chapter 7
)	
CLARKESVILLE LIQUIDATION INC.,)	
<i>et al., f/d/b/a Scovill Fasteners Inc. et al.</i> ¹ ,)	Case No. 11-21650-reb
)	
Debtors.)	Jointly Administered
_____)	

**NOTICE OF DEADLINE REQUIRING FILING REQUESTS FOR
ALLOWANCE OF CHAPTER 11 ADMINISTRATIVE EXPENSES
ON OR BEFORE NOVEMBER 15, 2011**

**TO ALL PERSONS AND ENTITIES WITH CHAPTER 11 ADMINISTRATIVE CLAIMS
AGAINST ANY OF THE ABOVE- CAPTIONED DEBTOR ENTITIES:**

PLEASE TAKE NOTICE THAT on _____, 2011, the United States Bankruptcy Court for the Northern District of Georgia, Gainesville Division (the “**Bankruptcy Court**”) entered an order (the “**Bar Date Order**”) establishing **November 15, 2011** (the “**Bar Date**”), as the last date and time for each person or entity (including individuals, partnerships, corporation, joint ventures, trusts and governmental units) to file a chapter 11 administrative expense request against Clarkesville Liquidation Inc., *et al.*, f/d/b/a Scovill Fasteners Inc. *et al.* (the “**Debtors**”).

PLEASE TAKE FURTHER NOTICE THAT the procedures set forth below for the filing of administrative expense requests apply to all claims against the Debtors that arose on or after to April 19, 2011 (the “**Petition Date**”), the date on which the Debtors commenced cases under chapter 11 the United States Bankruptcy Code (the “**Bankruptcy Code**”), but prior to the conversion of these cases to chapter 7 cases on July 12, 2011.

1. WHO MUST FILE AN ADMINISTRATIVE EXPENSE REQUEST

You should only file an administrative expense request if you have a claim against the Debtors that arose between April 19, 2011 and July 12, 2011 and your claim does not fall within one of the following categories:

- a. a Chapter 11 Administrative Claim that has heretofore been allowed by order of this Court;
- b. any person or entity whose claim has already been paid by the Debtors or the Trustee; or

¹ The Debtors include Scovill Fasteners Inc., Rau Fastener Company, L.L.C., Scomex, Inc., PCI Group, Inc., and Scovill, Inc.

c. any professional who has previously had its fees and expenses allowed by this Court.

2. WHAT TO FILE

All administrative expense requests must be signed by the individual to whom service of any papers relating to such claim shall be directed. It must be written in English and be denominated in lawful currency of the United States as of the Petition Date. You should attach to your completed administrative expense request any documents on which the claim is based.

3. WHEN AND WHERE TO FILE

Except as provided for herein, administrative expense requests must be filed so as to be received on or before **4:30 p.m. prevailing Eastern Time on November 15, 2011**, at the following address:

Clerk of the Court
United States Bankruptcy Court
Northern District of Georgia
Federal Building
121 Spring Street SE, Room 120
Gainesville, GA 30501

Please note that administrative expense requests will be deemed timely filed only if actually received by the Clerk of the Court on or before the Bar Date. Administrative expense requests may not be delivered by facsimile, telecopy or electronic mail.

4. CONSEQUENCES OF FAILURE TO FILE AN ADMINISTRATIVE EXPENSE REQUEST ON OR BEFORE THE BAR DATE

ANY HOLDER OF A CHAPTER 11 ADMINISTRATIVE EXPENSE CLAIM THAT FAILS TO TIMELY FILE AN ADMINISTRATIVE EXPENSE REQUEST IN THE APPROPRIATE FORM WILL BE BARRED FROM ASSERTING SUCH CLAIM AGAINST THE DEBTORS AND THEIR ESTATES, AND FROM PARTICIPATING IN ANY DISTRIBUTION IN THE DEBTORS' CASES ON ACCOUNT OF SUCH CLAIM.

A HOLDER OF A POSSIBLE CLAIM AGAINST THE DEBTORS OR THEIR ESTATES SHOULD CONSULT AN ATTORNEY REGARDING ANY MATTERS NOT COVERED BY THIS NOTICE, SUCH AS WHETHER THE HOLDER SHOULD FILE AN ADMINISTRATIVE EXPENSE REQUEST.

Dated: _____, 2011
Atlanta, Georgia

BY ORDER OF THE COURT

GREENBERG TRAUERIG, LLP

/s/ John D. Elrod
David B. Kurzweil, Ga. Bar No. 430492

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Counsel for S. Gregory Hays, Chapter 7 Trustee

EXHIBIT C

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION

IN RE:)	Chapter 7
)	
CLARKESVILLE LIQUIDATION INC.,)	
<i>et al.</i> , f/d/b/a Scovill Fasteners Inc. <i>et al.</i> , ²)	Case No. 11-21650-reb
)	
Debtors.)	Jointly Administered
_____)	

**ORDER ESTABLISHING
DEADLINE AND PROCEDURES FOR FILING REQUESTS
FOR ALLOWANCE OF CHAPTER 11 ADMINISTRATIVE EXPENSES AND
APPROVING THE FORM AND MANNER OF NOTICE THEREOF**

Upon consideration of the motion (the “**Motion**”) of S. Gregory Hays, as Chapter 7 Trustee (the “Trustee”) for Debtors Clarkesville Liquidation Inc., *et al.*, f/d/b/a Scovill Fasteners Inc. *et al.* (collectively, the “**Debtors**”) for entry of an order establishing the deadline and procedures for filing requests for allowance of Chapter 11 administrative expenses and approving the form and manner of notice thereof, all as more fully described in the Motion; and

² The Debtors include Scovill Fasteners Inc., Rau Fastener Company, L.L.C., Scomex, Inc., PCI Group, Inc., and Scovill, Inc.

the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. § 1334; and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided; and it appearing that no further notice need be provided; and the relief requested being in the best interest of the Debtors and their estates and creditors; and the Court having reviewed the Motion and considered all matters of record herein; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein;

IT IS HEREBY ORDERED that:

1. The Motion be, and hereby is, GRANTED.
2. Pursuant to Bankruptcy Rule 3003(c)(3), and except as otherwise provided herein, each person or entity (including, without limitation, each individual, partnership, joint venture, corporation, estate, trust and governmental unit) that asserts a chapter 11 administrative claim or expense against the Debtors that arose on or after April 19, 2011 but before July 12, 2011, shall file an original, written administrative expense form which substantially conforms to **Exhibit A** attached to the Motion (the “**Request Form**”), so as to be received on or before 4:30 p.m. prevailing Eastern Time on November 15, 2011 (the “**Bar Date**”).
3. The following procedures for the filing of Chapter 11 administrative expense requests shall apply:
 - a. Chapter 11 administrative expense requests must conform substantially with the Administrative Expense Form;
 - b. Chapter 11 administrative expense requests must be delivered to the Clerk of the Court

- c. Chapter 11 administrative expense requests will be deemed timely filed only if actually received by the Clerk of the Court on or before 4:30 p.m. on the Bar Date;
- d. Chapter 11 administrative expense requests must (i) be signed by the individual to whom service of any papers relating to such claim shall be directed; (ii) include supporting documentation (if voluminous, attach a summary) or an explanation as to why documentation is not available; (iii) be in the English language; and (iv) be denominated in lawful currency of the United States;
- e. the Clerk of the Court shall not accept Chapter 11 administrative expense requests sent by facsimile, telecopy or electronic mail; and
- f. Chapter 11 administrative expense requests must specify, by name, the Debtor against which the claim is filed; if the holder asserts a claim against more than one Debtor or has claims against different Debtors, a separate proof of claim must be filed with respect to each Debtor;

4. The following persons or entities are not required to file a Chapter 11 administrative expense requests on or before the Bar Date:

- a. any holder of a Chapter 11 Administrative Claim that has heretofore been allowed by order of this Court;
- b. any person or entity whose claim has already been paid by the Debtors or the Trustee;
- c. any professional who has previously had its fees and expenses allowed by this Court.

5. The Notice, as outlined in and attached to the Motion, constitutes proper, adequate, and sufficient notice of all proceedings and deadlines in connection therewith.

6. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, enforcement and/or interpretation of this Order.

*** END OF DOCUMENT ***

Prepared and presented by:

GREENBERG TRAURIG, LLP

/s/ John D. Elrod

David B. Kurzweil

Georgia Bar No. 430492

John D. Elrod

Georgia Bar No. 246604

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DISTRIBUTION LIST

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Atlanta, Georgia 30327

CERTIFICATE OF SERVICE

I certify that on this day I have served a copy of the foregoing document via notice of electronic filing or U.S. Mail on all parties receiving electronic notices in this case, as well as the parties on the Master Service List, including the following:

James Morawetz, Esq.
Office of the United States Trustee
Jim.H.Morawetz@usdoj.gov

This 21st day of September, 2011.

/s/ John D. Elrod
John D. Elrod, Ga Bar No. 246604