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CLERK
US BANKRUPTCY COURT
DISTRICT OF DELAWARE

LONGS PEAK POST NO. 2601 P.O. Box 1181 Longmont, Colorado 80502 Phone: 720-841-2815

29 April 2020

Interim Letter Disputing our Claims Numbered 7154 and 7155 being changed from Secured Status to General Unsecured Status

In the process of trying to find a Bankruptcy Attorney to represent our side.

To: The US Bankruptcy Court for the District of Delaware 824 Market Street, 3rd Floor

Wilmington, Delaware 19801

PACHKULSKI STANG ZIEHL & JONES LLP 919 North Market Street, 17th Floor P. O. Box 8705 Wilmington, Delaware 19899 (Courier 19801)

Fare 202 CE2 4400

Fax: 302-652-4400

Dear Sirs:

We, VFW Post 2601, are responding to your Notice of Twenty-Fourth (24th) Omnibus (Non- Substantive) Objection to Claims Pursuant to Section 502 of the Bankruptcy Code, Bankruptcy Rule 3007, and <u>Local Rules 3007-1 and 3007-2</u>. This is shown as Case No. 17-12560-BLS, Document No. 4408; 4408-1; 4408-2, 4408-3 & Exhibit A, dated and Administered/Filed 04/16/2020.

Let it be known that we, VFW Post 2601, regarding our Class A Shares on Claim Numbers 5154 and 7155, Secured Filed Status as of this date, *vehemently oppose modifying these claims to a General Unsecured Status*. We did not and could afford to retain an attorney at the beginning of these Bankruptcy Proceedings due to the fact that the \$600,000 we invested in the Woodbridge Company in good faith was the majority of our Capital Reserves. We planned to invest these monies short term until we recruited into our Post enough of the younger Veterans who could build into a new post what they seen as their future needs and priorities. Because of this Bankruptcy we have not been able to shop for a new Post 2601 Home, have had to rely on community organizations for meeting space, have lost many of our older veterans due to our not having a Post Home and are having great difficulty recruiting the younger veterans because they have no substantial vision of a home to call their own. Our membership has fallen from 400+ to just over 300 also during this time, due mainly to the loss of our building funds.

Due to the short turnaround time we were given to respond to this correspondence, we received it in our PO Box on Friday, 24 April 2020, and due to the shutdown of most businesses due to the COVID-19 Virus, we have not had any luck finding a Bankruptcy Attorney who would represent our side in responding to this correspondence. Therefore, we, VFW Post 2601, are doing the best we can to get to get to you by April 30, our objection to being reclassified from a Secured Status to an Unsecured Status. We have appreciated the payments towards our, in limbo, investment we have received and strongly feel this reclassification would greatly affect our reimbursement of lost funds to Woodbridge in the future.

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Also, please let it be known that through the selfishness and dishonest business practices of the Woodbridge Company, our Mission, "To foster camaraderie among United States veterans of overseas Conflicts. To serve our Veterans, the military, and our communities. To advocate on behalf of all veterans," has been hampered and our direct abilities to provide supports to our veterans, their families, and to the citizens of Longmont, Co., has suffered greatly.

Please accept this letter as our sincere effort to respond to your correspondence dated and filed on 04/26/2020. As VFW Post 2601 Adjutant I have been authorized by our Commander to submit this response to the above correspondence.

Sincerely,

Leon F. Bartholomay

VFW Post 2601

Adjutant