

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION

In re:	§ Chapter 11
	§
BRIGGS & STRATTON CORPORATION, <i>et al.</i> ,	§ Case No. 20-43597-399
	§
Debtors.	§ (Jointly Administered)
	§
	§ Hearing Date: October 7, 2021
	§ Hearing Time: 1:00 p.m. (Central Time)
	§ Hearing Location: Courtroom 5 North
	§ 111 S. 10th St., St. Louis, MO 63102

**NOTICE OF THE PLAN ADMINISTRATOR’S
TWENTY-THIRD OMNIBUS OBJECTION TO CLAIMS
ON GROUNDS OF NO LIABILITY (COVERED ASBESTOS CLAIMS)**

THIS IS AN OBJECTION TO YOUR CLAIM. THE OBJECTING PARTY IS ASKING THE COURT TO DISALLOW THE CLAIM THAT YOU FILED IN THIS BANKRUPTCY CASE.

IF YOU CHOOSE TO RESPOND, A WRITTEN RESPONSE MUST BE FILED WITH THE CLERK OF COURT, U.S. BANKRUPTCY COURT, 111 SOUTH TENTH STREET, 4TH FLOOR, ST. LOUIS, MISSOURI 63102, AND A COPY SERVED UPON COUNSEL TO THE PLAN ADMINISTRATOR, (A) HALPERIN BATTAGLIA BENZIJA LLP, 40 WALL STREET, 37TH FLOOR, NEW YORK, NEW YORK 10005 (ATTN: JULIE DYAS GOLDBERG, ESQ. AND MATTHEW MURRAY, ESQ.) AND (B) CARMODY MACDONALD P.C., 120 S. CENTRAL AVENUE, SUITE 1800, ST. LOUIS, MISSOURI 63105 (ATTN: DORMIE KO, ESQ.), SO THAT THE RESPONSE IS RECEIVED NO LATER THAN 11:59 P.M. (PREVAILING CENTRAL TIME) ON SEPTEMBER 30, 2021.

FAILURE TO FILE A TIMELY RESPONSE MAY RESULT IN THE COURT GRANTING THE RELIEF REQUESTED PRIOR TO THE HEARING DATE. YOU SHOULD READ THIS NOTICE AND THE ACCOMPANYING MOTION CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE.

Important Information Regarding the Objection

1. Grounds for the Objection. By this Objection, the Plan Administrator, on behalf of the Wind-Down Estates of the Debtors, is seeking to **disallow** your claim(s) on the grounds that each represents a claim that the Plan Administrator believes is a No Liability Claim.¹

¹ Capitalized terms used but not defined herein have the meanings ascribed to them in the Debtors’ Second Amended Joint Plan (the “Plan”).



The claim(s) subject to the Objection is/are listed in the table attached to the Objection as **Exhibit A**.

Resolving the Objection

2. Parties Required to File a Response. If you disagree with the Objection filed with respect to any of your claims, you may file a response (each, a “**Response**”) with the Court in accordance with the procedures described below and appear at the Hearing (as defined herein).

3. Response Contents. Each Response should contain the following (at a minimum):

- a. a caption stating the name of the Court, the name of the Debtors, the case number, and the Objection and claim or claims within the Objection to which the Response is directed;
- b. a concise statement setting forth the reasons why the Court should not grant the objection with respect to such claim(s), including the factual and legal bases upon which you rely in opposing the Objection;
- c. copies of documentation or other evidence of your claim (not previously filed with proof of such claim) on which your Response is based (excluding confidential, proprietary, or other protected information, copies of which must be provided to the counsel to the Plan Administrator, subject to appropriate confidentiality constraints, if any); and
- d. the following contact information:
 - (i) your name, address, telephone number, and email address or the name, address, telephone number, and email address of your attorney or designated representative to whom the attorneys for the Plan Administrator should serve a reply to the Response, if any; or
 - (ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the objection on your behalf (to the extent different from the information detailed in paragraph 3(d)(i) above).

4. Response Deadline. Your Response must be filed with the Court and served so as to be *actually received* by **11:59 p.m. (Central Time) on September 30, 2021** (the “**Response Deadline**”).

5. Failure to Respond. A Response that is not filed and served in accordance with the procedures set forth herein may not be considered by the Court at the Hearing. **Absent**

an agreement with the Plan Administrator resolving the Objection to a claim, failure to timely file and serve a Response as set forth herein and appear at the Hearing may result in the Court granting the Objection without further notice or hearing. Upon entry of an order, you will be served with a notice of entry, and a copy, of the order.

Hearing on the Objection

6. **Date, Time, and Location.** If necessary, a hearing (the “**Hearing**”) on the Objection will be held on **October 7, 2021 at 1:00 p.m. (Central Time) in the United States Bankruptcy Court for the Eastern District of Missouri, 5th Floor, North Courtroom, Thomas F. Eagleton United States Courthouse, 111 South Tenth Street, St. Louis, Missouri.** Such Hearing may be adjourned from time to time in these chapter 11 cases in the Plan Administrator’s sole discretion. **You must attend the Hearing if you disagree with the Objection and have filed a Response.** If you file a Response in accordance with the response procedures herein, but such Response is not resolved prior to the Hearing, and you appear at the Hearing, the Objection may be heard at the Hearing or adjourned to a subsequent hearing in the Plan Administrator’s sole discretion. If a subsequent hearing is determined to be necessary, the Plan Administrator will file with the Court and serve you with a notice of the subsequent hearing (the date of which will be determined in consultation with the affected claimant(s)).

Additional Information

7. **Questions or Information.** Copies of the pleadings (collectively, the “**Pleadings**”) filed in these chapter 11 cases are available at no cost at the Debtors’ case website <http://www.kccllc.net/Briggs>. You may also obtain copies of any of the Pleadings filed in these chapter 11 cases for a fee at the Court’s website at <https://pcl.uscourts.gov/pcl/>. A login identification and password to the Court’s Public Access to Court Electronic Records (“**PACER**”) are required to access this information and can be obtained through the PACER Service Center at <http://www.pacer.psc.uscourts.gov>.

Reservation of Rights

NOTHING IN ANY OMNIBUS OBJECTION OR OBJECTION NOTICE IS INTENDED OR SHALL BE DEEMED TO CONSTITUTE (I) AN ADMISSION AS TO THE VALIDITY OF ANY PREPETITION CLAIM AGAINST A DEBTOR; (II) A WAIVER OF ANY PARTY’S RIGHT TO DISPUTE ANY PREPETITION CLAIM ON ANY GROUNDS; (III) A PROMISE OR REQUIREMENT TO PAY ANY PREPETITION CLAIM; (IV) AN IMPLICATION OR ADMISSION THAT ANY PARTICULAR CLAIM IS OF A TYPE SPECIFIED OR DEFINED IN THE MOTION OR ANY ORDER GRANTING THE RELIEF REQUESTED BY THE MOTION; (V) A REQUEST OR AUTHORIZATION TO ASSUME ANY PREPETITION AGREEMENT, CONTRACT, OR LEASE PURSUANT TO SECTION 365 OF THE BANKRUPTCY CODE; OR (VI) A WAIVER OF THE PLAN ADMINISTRATOR’S RIGHTS UNDER THE BANKRUPTCY CODE OR ANY OTHER APPLICABLE LAW.

Dated: August 16, 2021
St. Louis, Missouri

CARMODY MACDONALD P.C.

/s/ Robert E. Eggmann

Robert E. Eggmann, #37374MO
Christopher J. Lawhorn, #45713MO
Thomas H. Riske, #61838MO
120 S. Central Avenue, Suite 1800
St. Louis, Missouri 63105
Telephone: (314) 854-8600
Facsimile: (314) 854-8660
Email: ree@carmodymacdonald.com
cjl@carmodymacdonald.com
thr@carmodymacdonald.com

Local Counsel to the Plan Administrator

-and-

HALPERIN BATTAGLIA BENZIJA LLP
Julie Dyas Goldberg
Matthew Murray
40 Wall Street, 37th Floor
New York, New York 10005
Telephone: (212) 765-9100
Email: jgoldberg@halperinlaw.net
mmurray@halperinlaw.net

Counsel to the Plan Administrator

EXHIBIT A

Schedule of No Liability Claims

Exhibit A - No Liability Claims
Briggs & Stratton Corp., et al.

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Basis for Proposed Modification
					Claim Amount	Priority	
1) Aaron Rider For Wesley Rider, Deceased SWMW Law, LLC 701 Market Street, Suite 1000 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1655	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
2) Alice Deloris, James Feyaert, and Karel A. Feyaerts Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1446	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
3) Ashley Elizabeth Billick, Estate Rep. For Robert R. Billick Weitz & Luxenberg P.C. 700 Broadway New York, NY 10003	20-43597	Briggs & Stratton Corporation	1421	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
4) Beaudoin, Albert & Ellen v. 84 Lumber Company, et al. Early, Lucarelli, Sweeney & Meisenkothen, LLC Christopher Meisenkothen One Century Tower, 11th Floor 265 Church Street, PO Box 1866 New Haven, CT 06508-1866	20-43597	Briggs & Stratton Corporation	1975	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$60,000.00 Total: \$60,000.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
5) Buddy G. Campbell Weitz & Luxenberg P.C. 700 Broadway New York, NY 10003	20-43597	Briggs & Stratton Corporation	1434	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
6) Carron Lewallen, on Behalf of William Lewallen c/o Sara Salger The Gori Law Firm 156 N. Main Street Edwardsville, IL 62025	20-43597	Briggs & Stratton Corporation	1374	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
7) Charles S. Kellen, Executor for the Estate Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1632	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
8) Christian D. Arditto, Administrator of the Estate Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street Ste 1200 St Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1614	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.

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Briggs & Stratton Corp., et al.

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Basis for Proposed Modification
					Claim Amount and Priority		
9) Christopher J. Gillling and Lynn E. Gillling Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1447	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
10) Connie Vinson And Thomas Vinson, Deceased SWMW Law, LLC 701 Market Street, Suite 1000 St Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1653	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
11) Dale T. Faulds Jr. Weitz & Luxenberg P.C. 700 Broadway New York, NY 10003	20-43597	Briggs & Stratton Corporation	1433	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
12) Debra Lack, Ind. & Rep. of the Est. of Bruce Lack Jamie L. Edmonson, Esq. Robinson & Cole LLP 1201 N. Market Street, Suite 1406 Wilmington, DE 19801	20-43597	Briggs & Stratton Corporation	813	9/28/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
13) Gary Gresch c/o Sara Salger The Gori Law Firm 156 N Main Street Edwardsville, IL 62025	20-43597	Briggs & Stratton Corporation	1371	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
14) Gene A. Green, Personal Representative for Estate Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1630	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
15) George Sweetman Weitz & Luxenberg P.C. 700 Broadway New York, NY 10003	20-43597	Briggs & Stratton Corporation	1432	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
16) Gregory Lee Richards & Donna Richards, His Wife Simmons Hanly Conroy 1 Court St Alton, IL 62002	20-43597	Briggs & Stratton Corporation	2128	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.

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Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Basis for Proposed Modification
					Claim Amount and Priority		
17) Jack C. And Gretchen Smith c/o Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1531	10/6/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
18) James H. Burks c/o Sara Salger The Gori Law Firm 156 N Main Street Edwardsville, IL 62025	20-43597	Briggs & Stratton Corporation	1368	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
19) James Troy And Elaine Troy c/o Jamie L. Edmonson, Esq. Robinson & Cole LLP 1201 N. Market Street, Suite 1406 Wilmington, DE 19801	20-43597	Briggs & Stratton Corporation	812	9/28/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
20) Jeffrey P. Dunker And Carol L. Dunker Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1444	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
21) Johanna L. Falsetta, Estate Rep. for Henry R. Bettke Weitz & Luxenberg P.C. 700 Broadway New York, NY 10003	20-43597	Briggs & Stratton Corporation	1431	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
22) John Crandall Stuart Purdy c/o Simon Greenstone Panatier, P.C. 3780 Kilroy Airport Way, Suite 540 Long Beach, CA 90806	20-43597	Briggs & Stratton Corporation	1944	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
23) Jonathan Plumitallo, Estate Rep. for Thomas Plumitallo Weitz & Luxenberg P.C. 700 Broadway New York, NY 10003	20-43597	Briggs & Stratton Corporation	1416	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
24) Joyce Suter, Estate Representative for John W. Suter Weitz & Luxenberg P.C. 700 Broadway New York, NY 10003	20-43597	Briggs & Stratton Corporation	1428	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.

Exhibit A - No Liability Claims
Briggs & Stratton Corp., et al.

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted Claim Amount and Priority		Basis for Proposed Modification
25) Kenneth Jones c/o Sara Salger The Gori Law Firm 156 N Main St Edwardsville, IL 62025	20-43597	Briggs & Stratton Corporation	1372	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
26) Leslie L. And Susan M. Olson Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1450	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
27) Lisa Payne, Special Administrator for the Estate Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1633	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
28) Maldonado, Donald and Maria, His Wife SWMW Law, LLC 701 Market Street, Suite 1000 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1654	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
29) Maurice W. Donnell, as Special Administrator Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1626	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
30) Michael A. Runyon Weitz & Luxenberg P.C. 700 Broadway New York, NY 10003	20-43597	Briggs & Stratton Corporation	1424	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
31) Michael E. Lynn c/o Sara Salger The Gori Law Firm 156 N Main Street Edwardsville, IL 62025	20-43597	Briggs & Stratton Corporation	1376	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
32) Michael Savianeso Weitz & Luxenberg P.C. 700 Broadway New York, NY 10003	20-43597	Briggs & Stratton Corporation	1422	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.

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Briggs & Stratton Corp., et al.

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Basis for Proposed Modification
					Claim Amount	Priority	
33) Paula Wilson, Special Administrator for the Estate Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street Ste 1200 St Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1638	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
34) Philip Hazelberg, Special Administrator for estate Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1631	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
35) Prescott, Bryan Brian Early c/o The Early Law Firm, LLC 360 Lexington Avenue, 20th Floor New York, NY 10003	20-43597	Briggs & Stratton Corporation	1963	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$500,000.00 Total: \$500,000.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
36) Robert H. Kincaid, Jr. and Janet E. Kincaid Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1449	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
37) Ruth F. Himes, Executor for the Estate Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1634	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
38) Ruthanna Taylor For James Taylor, Deceased SWMW Law, LLC 701 Market Street, Suite 1000 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1657	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
39) Sandra Brezonick 220 S Ashland Ave Chicago, IL 60607	20-43597	Briggs & Stratton Corporation	538	9/14/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$150,000.00 Total: \$150,000.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
40) Sapp, Robert and Jane, his wife SWMW Law LLC 701 Market Street, Suite 1000 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1650	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.

Exhibit A - No Liability Claims
Briggs & Stratton Corp., et al.

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Basis for Proposed Modification
					Claim Amount and Priority		
41) Terry Harris Weitz & Luxenberg P.C. 700 Broadway New York, NY 10003	20-43597	Briggs & Stratton Corporation	1420	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
42) Thomas Ewing, on Behalf of Mary Ewing, Deceased c/o Sara Salger The Gori Law Firm 156 N Main Street Edwardsville, IL 62025-6202	20-43597	Briggs & Stratton Corporation	1369	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
43) Thomas Turner c/o Brookman, Rosenberg, Brown, & Sandler 30 S. 15th Street, 17th Floor Philadelphia, PA 19102	20-43597	Briggs & Stratton Corporation	1575	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
44) William Treat c/o Sara Salger The Gori Law Firm 156 N Main St Edwardsville, IL 62025	20-43597	Briggs & Stratton Corporation	1378	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION

In re: § Chapter 11
BRIGGS & STRATTON §
CORPORATION, *et al.*, § Case No. 20-43597-399
§ (Jointly Administered)
Debtors. § Hearing Date: October 7, 2021
§ Hearing Time: 1:00 p.m. (Central Time)
§ Hearing Location: Courtroom 5 North
§ 111 S. 10th St., St. Louis, MO 63102

THE PLAN ADMINISTRATOR'S TWENTY-THIRD OMNIBUS OBJECTION TO CLAIMS ON GROUNDS OF NO LIABILITY (COVERED ASBESTOS CLAIMS)

THIS IS AN OBJECTION TO YOUR CLAIM. THE OBJECTING PARTY IS ASKING THE COURT TO DISALLOW THE CLAIM THAT YOU FILED IN THIS BANKRUPTCY CASE.

IF YOU CHOOSE TO RESPOND, A WRITTEN RESPONSE MUST BE FILED WITH THE CLERK OF COURT, U.S. BANKRUPTCY COURT, 111 SOUTH TENTH STREET, 4TH FLOOR, ST. LOUIS, MISSOURI 63102, AND A COPY SERVED UPON COUNSEL TO THE PLAN ADMINISTRATOR, (A) HALPERIN BATTAGLIA BENZIJA LLP, 40 WALL STREET, 37TH FLOOR, NEW YORK, NEW YORK 10005 (ATTN: JULIE DYAS GOLDBERG, ESQ. AND MATTHEW MURRAY, ESQ.) AND (B) CARMODY MACDONALD P.C., 120 S. CENTRAL AVENUE, SUITE 1800, ST. LOUIS, MISSOURI 63105 (ATTN: DORMIE KO, ESQ.), SO THAT THE RESPONSE IS RECEIVED NO LATER THAN 11:59 P.M. (PREVAILING CENTRAL TIME) ON SEPTEMBER 30, 2021.

FAILURE TO FILE A TIMELY RESPONSE MAY RESULT IN THE COURT GRANTING THE RELIEF REQUESTED PRIOR TO THE HEARING DATE. YOU SHOULD READ THIS NOTICE AND THE ACCOMPANYING MOTION CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE.

Alan D. Halperin as Plan Administrator (the “**Plan Administrator**”) under the *Amended Joint Chapter 11 Plan of Briggs & Stratton Corporation and its Affiliated Debtors*, dated November 9, 2020 [Docket No. 1226] (the “**Plan**”),¹ respectfully represents as follows in support of this omnibus objection to claims (the “**Objection**”) that are asserted to be no liability claims

¹ Capitalized terms used but not defined herein have the meanings ascribed to them in the Plan.

(the “**No Liability Claims**”). The Plan Administrator submits that the Wind-Down Estates (the “**Wind-Down Estates**”) of Briggs & Stratton Corporation and its affiliated Debtors (the “**Debtors**”) have no liability because each of these claims is based on one or more of multiple asbestos lawsuits that, in the event the Wind-Down Estates are determined to be liable to the claimants, the resulting damages would be paid by various insurance carriers pursuant to “all sums” policies under which the Debtors were insured.² Thus, any claims arising under such relevant coverage periods will be fully satisfied by insurance to the extent liability is proven. For the avoidance of doubt, these insurance policies, in each case, cover the entirety of the asserted claims such that there is no possibility that the Wind-Down Estates would have any liability if and when such claims are proven. Accordingly, payment would be fully covered by the applicable insurers and would not be the responsibility of the Wind-Down Estates. Attached hereto as **Exhibit A** is the list of claimants and their claims that the Plan Administrator asserts should be disallowed on the basis that each is a No Liability Claim for the reasons stated herein. In further support of the Objection, attached hereto as **Exhibit B** is the *Declaration of Alan D. Halperin in Support of the Plan Administrator’s Twenty-Third Omnibus Objection to Claims on Grounds of No Liability (Covered Asbestos Claims)* (the “**Halperin Claims Declaration**”).

Background

1. On July 20, 2020 (the “**Petition Date**”), the Debtors each commenced with this Court a voluntary case under title 11 of the United States Code (the “**Bankruptcy Code**”).

² All of the claims that are subject to this Objection are related to alleged injuries with a date of first exposure during or prior to December 31, 1977. All of the Debtors’ relevant insurance policies for the period of December 31, 1977 or prior are, upon information and belief, “all sums” policies. The Plan Administrator believes that all claimants have actual knowledge of the policy or policies associated with their claims but to the extent claimants require further information on the policies, the Plan Administrator will provide such information to parties-in-interest upon request.

The Debtors are authorized to continue to operate their business and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. On August 5, 2020, the United States Trustee appointed an official committee of unsecured creditors (the “**Creditors’ Committee**”) in these chapter 11 cases pursuant to section 1102 of the Bankruptcy Code. No trustee or examiner has been appointed in these chapter 11 cases. The Debtors’ chapter 11 cases are being jointly administered for procedural purposes only pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) and Rule 1015(b) of the Local Rules of Bankruptcy Procedure for the Eastern District of Missouri (the “**Local Rules**”).

3. On September 15, 2020, the Court entered an order authorizing the Debtors to sell substantially all of their assets³ to Bucephalus Buyer, LLC (the “**Purchaser**”) and on September 21, 2020, the Debtors closed the Sale Transaction.⁴ On December 16, 2020, the Debtors filed the Plan, which was confirmed by the *Findings of Fact, Conclusions of Law, and Order Confirming the Plan* on December 18, 2020 [Docket No. 1485] (the “**Confirmation Order**”).

4. The Effective Date of the Plan occurred on January 6, 2021 and the *Notice of Entry of Order Confirming the Plan and Occurrence of the Effective Date* [Docket No. 1538] was filed, at which time the Creditors’ Committee was relieved of its duties and the Plan Administrator took over the administration of the Wind-Down Estates in accordance with the Plan. The Wind-Down Estates continue to honor their post-closing sale obligations, wind down the estates, and otherwise work on concluding these chapter 11 cases.

³ *Order (I) Authorizing the Sale of the Assets and Equity Interests to the Purchaser Free and Clear of Liens, Claims, Interests, and Encumbrances; (II) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (III) Granting Related Relief* [Docket No. 898].

⁴ *See Notice of (I) Filing of Amendment to Stock and Asset Purchase Agreement, And (II) the Occurrence of Closing of the Sale Transaction* [Docket No. 964].

5. On February 12, 2021, the Bankruptcy Court entered that certain Order Approving Claims Objection Procedures, Claims Hearing Procedures and Granting Related Relief [Docket No. 1614] (the “**Omnibus Procedures Order**”), which, among other things, increased the number of claims authorized to be filed in an omnibus claim objection such as this Objection to three hundred fifty (350) Claims.

Jurisdiction

6. The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

Relief Requested

7. Pursuant to section 502(b) of the Bankruptcy Code, Bankruptcy Rule 3007, and Local Rule 3007(C), the Plan Administrator respectfully requests entry of an order (the “**Proposed Order**”),⁵ disallowing the No Liability Claims listed on **Exhibit A**.

Claims Reconciliation

8. On August 23, 2020, the Debtors filed their schedules of assets, liabilities, current income, expenditures, executory contracts, and unexpired leases and statements of financial affairs, as required by section 521 of the Bankruptcy Code [Docket Nos. 555–559] (collectively, the “**Schedules**”).

9. On August 24, 2020, the Court entered an order [Docket No. 564] (the “**Bar Date Order**”), which, among other things, established (a) October 7, 2020 as the deadline for all non-governmental entities holding or wishing to assert a “claim” (as defined in section 101(5) of the Bankruptcy Code) against any of the Debtors that arose before the Petition Date to file a proof

⁵ Copies of the Proposed Order will be made available on the Debtors’ case information website at <http://www.kccllc.net/Briggs>.

of such claim in writing (the “**General Bar Date**”), and (b) January 19, 2021 as the deadline for all governmental entities holding or wishing to assert a “claim” against any of the Debtors that arose before the Petition Date to file a proof of such claim in writing.

10. As of the date hereof, approximately 2,950 proofs of claim (the “**Proofs of Claim**”) have been filed against the Debtors. The Plan Administrator and his advisors have been working diligently to review these Proofs of Claim, including any supporting documentation filed therewith. For the reasons set forth below, and based on their review to date, the Plan Administrator has determined that the claims objected to herein should be disallowed.

11. As set forth in the Halperin Claims Declaration, the Plan Administrator and his professionals have examined each No Liability Claim, all documentation provided by the claimant with respect to each No Liability Claim, and the Debtors’ respective books and records, and have determined in each case that the No Liability Claims are claims that should be disallowed. Each No Liability Claim is a claim that payment in satisfaction thereof would not, in any way, be the responsibility of the Wind-Down Estates. The Wind-Down Estates do not have any potential responsibility for satisfaction of these No Liability Claims because the Debtors, at all times relevant to the No Liability Claims at issue, held “all sums” insurance policies that would cover the prospective liabilities in their entirety (if and when proven) that form the basis of each of these No Liability Claims. Accordingly, each such corresponding Proof of Claim should be disallowed, as described on **Exhibit A** annexed hereto.

Relief Requested Should Be Granted

12. Pursuant to section 502 of the Bankruptcy Code, “[a] claim or interest, proof of which is filed under section 501 of [the Bankruptcy Code], is deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a). Bankruptcy Rule 3001(f) provides that a properly executed and filed proof of claim constitutes *prima facie* evidence of the validity and amount of

the claim under section 502(a) of the Bankruptcy Code. FED. R. BANKR. P. 3001(f). The act of filing an objection alone “does not deprive the proof of claim of presumptive validity unless the objection is supported by substantial evidence.” *In re Austin*, 538 B.R. 543, 545 (Bankr. E.D. Mo. 2015) (citing *In re McDaniel*, 264 B.R. 531, 533 (B.A.P. 8th Cir. 2001)). If the objection presents evidence “rebutting the claim,” then “the claimant must produce additional evidence to prove the validity of the claim by a preponderance of the evidence.” *In re Austin*, 538 B.R. at 545 (citing *In re Gran*, 964 F.2d 822, 827 (8th Cir. 1992); see also *In re Peabody Energy Corp.*, Case No. 16-42529 (BSS), 2017 WL 4570700, at *7 (Bankr. E.D. Mo. Oct. 12, 2017); *In re Seagraves*, Case No. 12-49433 (BSS), 2015 WL 2026707, at *2 (Bankr. E.D. Mo. Apr. 30, 2015); *Dove-Nation v. eCast Settlement Corp. (In re Dove-Nation)*, 318 B.R. 147, 152 (B.A.P. 8th Cir. 2004) (citing *In re Innovative Software Designs, Inc.*, 253 B.R. 40, 44 (B.A.P. 8th Cir. 2000)).

13. The claims in the attached **Exhibit A** have all been identified as claims for which the Debtors have no liability because of various insurance policies that will cover any potential liability for the Debtors in full. Accordingly, the Plan Administrator (a) objects to the No Liability Claims listed on **Exhibit A** hereto, and (b) seeks entry of an order disallowing the No Liability Claims in their entirety.

Reservation of Rights

14. Nothing contained herein is intended to be or shall be deemed as (i) an admission as to the validity of any claim against the Debtors or the Wind-Down Estates, (ii) a waiver or limitation of rights to dispute the amount of, basis for, or validity of any claim, (iii) a waiver of rights under the Bankruptcy Code or any other applicable nonbankruptcy law, (iv) an agreement or obligation to pay any claims, (v) a waiver of any claims or causes of action which may exist against any creditor or interest holder, or (vi) an approval, assumption, adoption, or

rejection of any agreement, contract, lease, program, or policy under section 365 of the Bankruptcy Code.

Notice

15. Notice of this Objection will be provided to (i) the Office of the United States Trustee for the Eastern District of Missouri (Attn: Sirena Wilson, Esq.); (ii) the claimant; (iii) any other party that has requested notice pursuant to Bankruptcy Rule 2002; (iv) the various insurance carriers that issued the policies that would be responsible for payment of all amounts that may be due from the Debtors if the claimants are able to establish liability; and (v) any other party entitled to notice pursuant to the Omnibus Procedures Order (collectively, the “**Notice Parties**”).

No Previous Request

16. No previous request for the relief sought herein has been made by the Debtors or the Plan Administrator to this or any other court.

[Remainder of Page Intentionally Left Blank]

WHEREFORE, the Plan Administrator respectfully requests entry of the Proposed Order granting the relief requested herein and such other and further relief as the Court may deem just and appropriate.

Dated: August 16, 2021
St. Louis, Missouri

Respectfully submitted,

CARMODY MACDONALD P.C.

/s/ Robert E. Eggmann

Robert E. Eggmann, #37374MO
Christopher J. Lawhorn, #45713MO
Thomas H. Riske, #61838MO
120 S. Central Avenue, Suite 1800
St. Louis, Missouri 63105
Telephone: (314) 854-8600
Facsimile: (314) 854-8660
Email: ree@carmodymacdonald.com
cjl@carmodymacdonald.com
thr@carmodymacdonald.com

Local Counsel to the Plan Administrator

-and-

HALPERIN BATTAGLIA BENZIJA LLP
Julie Dyas Goldberg
Matthew Murray
40 Wall Street, 37th Floor
New York, New York 10005
Telephone: (212) 765-9100
Email: jgoldberg@halperinlaw.net
mmurray@halperinlaw.net

Counsel to the Plan Administrator

EXHIBIT A

Schedule of No Liability Claims

Exhibit A - No Liability Claims
Briggs & Stratton Corp., et al.

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Basis for Proposed Modification
					Claim Amount and Priority		
1) Aaron Rider For Wesley Rider, Deceased SWMW Law, LLC 701 Market Street, Suite 1000 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1655	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
2) Alice Deloris, James Feyaert, and Karel A. Feyaerts Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1446	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
3) Ashley Elizabeth Billick, Estate Rep. For Robert R. Billick Weitz & Luxenberg P.C. 700 Broadway New York, NY 10003	20-43597	Briggs & Stratton Corporation	1421	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
4) Beaudoin, Albert & Ellen v. 84 Lumber Company, et al. Early, Lucarelli, Sweeney & Meisenkothen, LLC Christopher Meisenkothen One Century Tower, 11th Floor 265 Church Street, PO Box 1866 New Haven, CT 06508-1866	20-43597	Briggs & Stratton Corporation	1975	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$60,000.00 Total: \$60,000.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
5) Buddy G. Campbell Weitz & Luxenberg P.C. 700 Broadway New York, NY 10003	20-43597	Briggs & Stratton Corporation	1434	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
6) Carron Lewallen, on Behalf of William Lewallen c/o Sara Salger The Gori Law Firm 156 N. Main Street Edwardsville, IL 62025	20-43597	Briggs & Stratton Corporation	1374	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
7) Charles S. Kellen, Executor for the Estate Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1632	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
8) Christian D. Arditto, Administrator of the Estate Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street Ste 1200 St Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1614	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.

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Briggs & Stratton Corp., et al.

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Basis for Proposed Modification
					Claim Amount and Priority		
9) Christopher J. Gillling and Lynn E. Gillling Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1447	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
10) Connie Vinson And Thomas Vinson, Deceased SWMW Law, LLC 701 Market Street, Suite 1000 St Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1653	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
11) Dale T. Faulds Jr. Weitz & Luxenberg P.C. 700 Broadway New York, NY 10003	20-43597	Briggs & Stratton Corporation	1433	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
12) Debra Lack, Ind. & Rep. of the Est. of Bruce Lack Jamie L. Edmonson, Esq. Robinson & Cole LLP 1201 N. Market Street, Suite 1406 Wilmington, DE 19801	20-43597	Briggs & Stratton Corporation	813	9/28/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
13) Gary Gresch c/o Sara Salger The Gori Law Firm 156 N Main Street Edwardsville, IL 62025	20-43597	Briggs & Stratton Corporation	1371	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
14) Gene A. Green, Personal Representative for Estate Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1630	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
15) George Sweetman Weitz & Luxenberg P.C. 700 Broadway New York, NY 10003	20-43597	Briggs & Stratton Corporation	1432	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
16) Gregory Lee Richards & Donna Richards, His Wife Simmons Hanly Conroy 1 Court St Alton, IL 62002	20-43597	Briggs & Stratton Corporation	2128	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.

Exhibit A - No Liability Claims
Briggs & Stratton Corp., et al.

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Basis for Proposed Modification
					Claim Amount and Priority		
17) Jack C. And Gretchen Smith c/o Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1531	10/6/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
18) James H. Burks c/o Sara Salger The Gori Law Firm 156 N Main Street Edwardsville, IL 62025	20-43597	Briggs & Stratton Corporation	1368	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
19) James Troy And Elaine Troy c/o Jamie L. Edmonson, Esq. Robinson & Cole LLP 1201 N. Market Street, Suite 1406 Wilmington, DE 19801	20-43597	Briggs & Stratton Corporation	812	9/28/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
20) Jeffrey P. Dunker And Carol L. Dunker Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1444	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
21) Johanna L. Falsetta, Estate Rep. for Henry R. Bettke Weitz & Luxenberg P.C. 700 Broadway New York, NY 10003	20-43597	Briggs & Stratton Corporation	1431	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
22) John Crandall Stuart Purdy c/o Simon Greenstone Panatier, P.C. 3780 Kilroy Airport Way, Suite 540 Long Beach, CA 90806	20-43597	Briggs & Stratton Corporation	1944	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
23) Jonathan Plumitallo, Estate Rep. for Thomas Plumitallo Weitz & Luxenberg P.C. 700 Broadway New York, NY 10003	20-43597	Briggs & Stratton Corporation	1416	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
24) Joyce Suter, Estate Representative for John W. Suter Weitz & Luxenberg P.C. 700 Broadway New York, NY 10003	20-43597	Briggs & Stratton Corporation	1428	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.

Exhibit A - No Liability Claims
Briggs & Stratton Corp., et al.

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Basis for Proposed Modification
					Claim Amount	Priority	
25) Kenneth Jones c/o Sara Salger The Gori Law Firm 156 N Main St Edwardsville, IL 62025	20-43597	Briggs & Stratton Corporation	1372	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
26) Leslie L. And Susan M. Olson Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1450	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
27) Lisa Payne, Special Administrator for the Estate Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1633	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
28) Maldonado, Donald and Maria, His Wife SWMW Law, LLC 701 Market Street, Suite 1000 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1654	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
29) Maurice W. Donnell, as Special Administrator Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1626	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
30) Michael A. Runyon Weitz & Luxenberg P.C. 700 Broadway New York, NY 10003	20-43597	Briggs & Stratton Corporation	1424	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
31) Michael E. Lynn c/o Sara Salger The Gori Law Firm 156 N Main Street Edwardsville, IL 62025	20-43597	Briggs & Stratton Corporation	1376	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
32) Michael Savianeso Weitz & Luxenberg P.C. 700 Broadway New York, NY 10003	20-43597	Briggs & Stratton Corporation	1422	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.

Exhibit A - No Liability Claims
Briggs & Stratton Corp., et al.

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Basis for Proposed Modification
					Claim Amount	Priority	
33) Paula Wilson, Special Administrator for the Estate Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street Ste 1200 St Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1638	10/7/2020	Secured:	\$0.00	The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$50,000.00	
					Total:	\$50,000.00	
34) Philip Hazelberg, Special Administrator for estate Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1631	10/7/2020	Secured:	\$0.00	The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$50,000.00	
					Total:	\$50,000.00	
35) Prescott, Bryan Brian Early c/o The Early Law Firm, LLC 360 Lexington Avenue, 20th Floor New York, NY 10003	20-43597	Briggs & Stratton Corporation	1963	10/5/2020	Secured:	\$0.00	The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$500,000.00	
					Total:	\$500,000.00	
36) Robert H. Kincaid, Jr. and Janet E. Kincaid Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1449	10/5/2020	Secured:	\$0.00	The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$50,000.00	
					Total:	\$50,000.00	
37) Ruth F. Himes, Executor for the Estate Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1634	10/7/2020	Secured:	\$0.00	The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$50,000.00	
					Total:	\$50,000.00	
38) Ruthanna Taylor For James Taylor, Deceased SWMW Law, LLC 701 Market Street, Suite 1000 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1657	10/7/2020	Secured:	\$0.00	The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$0.00	
					Total:	\$0.00	
39) Sandra Brezonick 220 S Ashland Ave Chicago, IL 60607	20-43597	Briggs & Stratton Corporation	538	9/14/2020	Secured:	\$0.00	The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$150,000.00	
					Total:	\$150,000.00	
40) Sapp, Robert and Jane, his wife SWMW Law LLC 701 Market Street, Suite 1000 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1650	10/7/2020	Secured:	\$0.00	The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
					Administrative:	\$0.00	
					Priority:	\$0.00	
					Unsecured:	\$0.00	
					Total:	\$0.00	

Exhibit A - No Liability Claims
Briggs & Stratton Corp., et al.

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		Basis for Proposed Modification
					Claim Amount and Priority		
41) Terry Harris Weitz & Luxenberg P.C. 700 Broadway New York, NY 10003	20-43597	Briggs & Stratton Corporation	1420	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
42) Thomas Ewing, on Behalf of Mary Ewing, Deceased c/o Sara Salger The Gori Law Firm 156 N Main Street Edwardsville, IL 62025-6202	20-43597	Briggs & Stratton Corporation	1369	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
43) Thomas Turner c/o Brookman, Rosenberg, Brown, & Sandler 30 S. 15th Street, 17th Floor Philadelphia, PA 19102	20-43597	Briggs & Stratton Corporation	1575	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.
44) William Treat c/o Sara Salger The Gori Law Firm 156 N Main St Edwardsville, IL 62025	20-43597	Briggs & Stratton Corporation	1378	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Debtors' have no liability for this litigation-related claim. The Debtors' insurance policies in effect as of the date of the causes of action are "all sums" policies that fully cover the related liability, if any.

EXHIBIT B

Halperin Claims Declaration

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION

	§	Chapter 11
In re:	§	
	§	Case No. 20-43597-399
BRIGGS & STRATTON	§	
CORPORATION, et al.,	§	(Jointly Administered)
	§	
Debtors.	§	

**DECLARATION OF ALAN D. HALPERIN IN SUPPORT OF THE PLAN
ADMINISTRATOR’S TWENTY-THIRD OMNIBUS OBJECTION TO CLAIMS
ON GROUNDS OF NO LIABILITY (COVERED ASBESTOS CLAIMS)**

I, Alan D. Halperin, solely in my capacity as Plan Administrator in the above-referenced cases, make this declaration (the “**Declaration**”) under 28 U.S.C. § 1746:

1. I am the Plan Administrator of the Wind-Down Estates of Briggs & Stratton Corporation and its affiliated debtors (the “**Debtors**”).¹

2. Except as otherwise indicated, this Declaration is based upon my personal knowledge; my review of relevant documents (including the No Liability Claims, and the Objection); information provided to me by: (i) a former officer of the Debtors with whom the Wind-Down Estates have entered into a consulting agreement, (ii) former employees that were transferred to the Purchaser and who provide claims reconciliation services to the Debtors pursuant to a transition services agreement with the Purchaser, (iii) the Debtors’ legal and financial advisors, and/or (iv) my legal counsel and such professionals working directly with me or under my supervision, direction, or control; or my opinion, based upon my experience, knowledge, and information concerning the Debtors’ operations. If called upon to testify, I would testify competently to the facts set forth herein. I am authorized to submit this Declaration on behalf of

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Objection.

the Wind-Down Estates, in support of the *Plan Administrator's Twenty-Third Omnibus Objection to Claims on Grounds of No Liability (Covered Asbestos Claims)* (the “**Objection**”).

3. To the best of my knowledge, information, and belief, the assertions made in the Objection are accurate. I can confirm that the Debtors’ advisors have examined each No Liability Claim, all documentation provided by the claimant with respect to each No Liability Claim, the Debtors’ respective books and records, and the Schedules, and have determined that each No Liability Claim is a claim that should be disallowed. The basis for objection to each claim is that each of these claims is based on a cause of action that is fully covered by one or more of multiple “all sums” insurance policies held by the Debtors. Therefore, the Wind-Down Estates have no responsibility to satisfy any of the claims, or any portion of such claims. As such, the No Liability Claims should be disallowed.

4. I declare under penalty of perjury that, to the best of my knowledge and after reasonable inquiry, the foregoing is true and correct.

Dated: August 16, 2021

/s/ Alan D. Halperin
Alan D. Halperin
Solely in His Capacity as Plan Administrator