

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION

In re:	§ Chapter 11
	§
	§ Case No. 20-43597-399
BRIGGS & STRATTON CORPORATION, <i>et al.</i> ,	§
	§ (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

**NOTICE OF THE PLAN ADMINISTRATOR’S
TWENTY-FOURTH OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY)**

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 CARRIE E. ESSENFELD, 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,¹ the Plan Administrator, on behalf of the Wind-Down Estates of the Debtors, is seeking to **disallow** the claims identified on **Exhibit A** attached to the Objection.

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



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 31, 2021
St. Louis, Missouri

CARMODY MACDONALD P.C.

/s/ Robert E. Eggmann

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Christopher J. Lawhorn, #45713MO
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Local Counsel to the Plan Administrator

-and-

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Counsel to the Plan Administrator

EXHIBIT A

Schedule of Claims

Exhibit A
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
1) B & S 1712 3PI Uwc Carson Ca - Universal Warehouse Co 2850 E Del Amo Blvd Compton, CA 90221-6007	20-43597	Briggs & Stratton Corporation	1174	9/23/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$37,977.24 Total: \$37,977.24	This claim is amended and superseded by claim #2595 filed on July 14, 2021. For the avoidance of doubt, the Debtors are not objecting to claim #2595 as part of this claims objection.
2) Barbara Nelson Hinds 642 Hedwig Road Houston, TX 77024	20-43597	Briggs & Stratton Corporation	2593	6/28/2021	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	This is a claim for lost value of equity. The Debtors have no liability for such interests, which were cancelled under the confirmed plan of liquidation.
3) Brandon, Gerald (Estate Of) Richard H. Offutt, Jr. c/o Hoffman, Comfort, Offutt, Scott & Halstad, LLP 24 North Court Street Westminster, MD 21157	20-43597	Briggs & Stratton Corporation	1709	9/28/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$1,250,000.00 Total: \$1,250,000.00	Proof of claim alleges damages in the amount of \$1.25 million for personal injury/wrongful death but attaches no information in support of the claim or how one or more of the Debtors has been proven to be liable for these damages.
4) Chianti Butler 703 Ailey Lothair Rd Mount Vernon, GA 30445	20-43597	Briggs & Stratton Corporation	734	9/23/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$10,000.00 Total: \$10,000.00	Proof of claim of an employee who alleges damages in the amount of \$10,000 for wrongful termination. Claim attaches no EEOC complaint or other information in support of the claim.
5) Darrin And Sheila Begley Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1029	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00	Proof of claim alleges damages in the amount of \$50,000 for wrongful death but attaches no information in support of the claim or how one or more of the Debtors has been proven to be liable for these damages.
6) David R. Cloutier 8 Brentwood Circle Saco, ME 04072	20-43597	Briggs & Stratton Corporation	2010	10/1/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$36,015.37 Total: \$36,015.37	This is a claim for lost value of equity. The Debtors have no liability for such interests, which were cancelled under the confirmed plan of liquidation.
7) Dewayne Pogue 242 Old 280 Hwy Camp Hill, AL 36850	20-43597	Briggs & Stratton Corporation	641	9/14/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	The Proof of Claim alleges damages of \$0 and does not reference this as being an unliquidated amount; however out of an abundance of caution, the Plan Administrator objects in order to confirm creditor asserts \$0 against the estates. Claimant has not provided information in support of how one or more of the Debtors has been proven to be liable for damages of any kind.
8) Eric T. Chack Eric Chack W340N4811 Township Rd O Nashotah, WI 53058	20-43597	Briggs & Stratton Corporation	531	9/8/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$1,665,277.00 Total: \$1,665,277.00	This is a claim in part for lost value of equity, which equity was cancelled under the confirmed plan of liquidation. The balance of the claim asserts damages for alleged misrepresentations to Claimant by the Debtors, which are wholly unproven.
9) Jerry D Waid 3595 E Elswood Idaho Falls, ID 83402	20-43597	Briggs & Stratton Corporation	1842	9/29/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$1,934.60 Total: \$1,934.60	This is a claim for lost value of equity. The Debtors have no liability for such interests, which were cancelled under the confirmed plan of liquidation.
10) John B. Leonard Weitz & Luxenberg P.C. 700 Broadway New York, NY 10003	20-43597	Briggs & Stratton Corporation	1430	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Proof of claim asserts asbestos related personal injury in an unliquidated amount but attaches no information in support of the claim or how one or more of the Debtors has been proven to be liable for these damages.

Exhibit A
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
11) John Ford N17 W26865 East Fieldhack Drive, Apt. C Pewaukee, WI 53072	20-43597	Briggs & Stratton Corporation	210	9/8/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$2,000,000.00 Total: \$2,000,000.00	Proof of claim alleges damages in the amount of \$2 million for discrimination based on age (48), race (Caucasian), sex (male) and disability (depression) but attaches no information in support of the claim or how one or more of the Debtors has been proven to be liable for these damages.
12) Joyce Franchett c/o Sara Salger The Gori Law Firm 156 N Main Street Edwardsville, IL 62025	20-43597	Briggs & Stratton Corporation	1370	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	The Proof of Claim alleges damages of \$0 and does not reference this as being an unliquidated amount; however out of an abundance of caution, the Plan Administrator objects in order to confirm creditor asserts \$0 against the estates. Claimant claim is believed to be associated with asbestos for which the date of first exposure would invoke an "all sums" insurance policy.
13) Keith And Carole Chirgwin 1810 30th Ave W Seattle, WA 98199	20-43597	Briggs & Stratton Corporation	2013	10/1/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$14,925.00 Total: \$14,925.00	This is a claim for lost value of equity. The Debtors have no liability for such interests, which were cancelled under the confirmed plan of liquidation.
14) Kurt L Martin 73 Woodridge Lane Murray, KY 42071	20-43597	Briggs & Stratton Corporation	1098	10/4/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$51,278.71 Total: \$64,928.71	This claim was filed on 10/4/20 and asserted a total claim of \$78,578.71 of which \$13,650 was asserted as priority. Later in the same day, claim 1098-2 was filed, acknowledging that the \$13,650 priority amount had already been paid and only the remaining \$64,928.71 general unsecured claim was outstanding. The Debtors assert no liability for claim no. 1098-1 in light of the amendment. For the avoidance of doubt, claim no. 1098-2 is not affected by this objection.
15) Larry G. Salsbury 19115 Thomson Drive #203 Brookfield, WI 53045-5188	20-43597	Briggs & Stratton Corporation	369	9/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Claim is filed by a beneficial bondholder and is therefore duplicative of a master Proof of Claim filed by the Indenture Trustee for such bondholder (claim 856 filed against Briggs & Stratton Corporation, case number 20-43597). To the extent that the proof of claim asserts a non-duplicative claim for unmaturred interest, that portion of the claim should be disallowed under section 502(b)(2) of the Bankruptcy Code.
16) Lewis Alexander c/o Jon C. Goldfarb Wiggins Childs Pantazis Fisher Goldfarb LLC 301 19 St N Birmingham, AL 35203	20-43597	Briggs & Stratton Corporation	448	9/1/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Claimant filed a complaint with the EEOC alleging discrimination. EEOC declined to pursue and released the cause of action to Claimant who brought a Federal action that has been dismissed. Claimants allegations do not satisfy burden of proof that Debtors are liable for these damages.
17) Lewis Alexander c/o Jon C. Goldfarb Wiggins Childs Pantazis Fisher Goldfarb LLC 301 19 St N Birmingham, AL 35203	20-43597	Briggs & Stratton Corporation	1233	9/18/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Claimant filed a complaint with the EEOC alleging discrimination. EEOC declined to pursue and released the cause of action to Claimant who brought a Federal action that has been dismissed. Claimants allegations do not satisfy burden of proof that Debtors are liable for these damages.
18) Linda R. George 2942 El Dorado Dr. Medford, OR 97504	20-43597	Briggs & Stratton Corporation	2009	10/1/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$15,223.50 Total: \$15,223.50	This is a claim for lost value of equity. The Debtors have no liability for such interests, which were cancelled under the confirmed plan of liquidation.
19) Marci Joy Ashton 10563 S Sandy Sage Way Sandy, UT 84070-1342	20-43597	Briggs & Stratton Corporation	2590	6/6/2021	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$15,000.00 Total: \$15,000.00	Claim is filed by a beneficial bondholder and is therefore duplicative of a master Proof of Claim filed by the Indenture Trustee for such bondholder (claim 856 filed against Briggs & Stratton Corporation, case number 20-43597). To the extent that the proof of claim asserts a non-duplicative claim for unmaturred interest, that portion of the claim should be disallowed under section 502(b)(2) of the Bankruptcy Code.
20) Michael Gayle Leonard Legal Group, LLC 165 Washington Street Morristown, NJ 07960-0796	20-43597	Briggs & Stratton Corporation	331	9/1/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$1,000,000.00 Total: \$1,000,000.00	Proof of claim alleges damages in the amount of \$1 million for personal injury but attaches no information in support of the claim or how one or more of the Debtors has been proven to be liable for these damages.

Exhibit A
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
21) Peter Barniak, Estate Representative For Theodore Barniak Weitz & Luxenberg P.C. 700 Broadway New York, NY 10003	20-43597	Briggs & Stratton Corporation	1419	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Proof of claim asserts asbestos related personal injury in an unliquidated amount but attaches no information in support of the claim or how one or more of the Debtors has been proven to be liable for these damages.
22) Randall M. Brogdon Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1031	10/2/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00	The Debtors were dismissed from the litigation underlying the claim, with no resulting liability for the Debtors.
23) Rex Astle 455 Dale Dr Idaho Falls, ID 83402	20-43597	Briggs & Stratton Corporation	1903	9/30/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$3,174.44 Total: \$3,174.44	This is a claim for lost value of equity. The Debtors have no liability for such interests, which were cancelled under the confirmed plan of liquidation.
24) Rosemary Jones, On Behalf Of Giacomo Grassi, Decd c/o Sara Salger The Gori Law Firm 156 N. Main Street Edwardsville, IL 62025	20-43597	Briggs & Stratton Corporation	1026	10/2/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$40,000.00 Total: \$40,000.00	The Debtors were dismissed from the litigation underlying the claim, with no resulting liability for the Debtors.
25) Scott Carl Podella Scott Podella W277 N4862 Jessy Ct Pewaukee, WI 53072	20-43597	Briggs & Stratton Corporation	1284	9/21/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$48,852.00 Total: \$48,852.00	This claim was filed on 9/21/20 and is an exact duplicate of claim no. 1065 filed on 10/3/20, which has been allowed per Docket No. 1857. The Debtors assert no liability for claim no. 1284 in light of the allowance of claim no. 1065.
26) Steven Mertens 4371 Roberts Lake Rd. Laona, WI 54541	20-43597	Briggs & Stratton Corporation	549	9/14/2020	Secured: \$0.00 Administrative: \$1,270.80 Priority: \$0.00 Unsecured: \$0.00 Total: \$1,270.80	This is a claim for lost value of equity. The Debtors have no liability for such interests, which were cancelled under the confirmed plan of liquidation.
27) Thomas C. Varrelmann S108 W37150 Draper Rd Eagle, WI 53119	20-43597	Briggs & Stratton Corporation	2583	4/12/2021	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$2,568.56 Total: \$2,568.56	This is a claim for lost value of equity. The Debtors have no liability for such interests, which were cancelled under the confirmed plan of liquidation.
28) Visakay, Aida Edward Capozzi c/o Brach Eichler, LLC 101 Eisenhower Parkway Roseland, NJ 07068	20-43597	Briggs & Stratton Corporation	1739	9/28/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$10,000,000.00 Total: \$10,000,000.00	Proof of claim alleges damages in the amount of \$10 million for personal injury but attaches no information in support of the claim or how one or more of the Debtors has been proven to be liable for these damages.

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION

In re:	§	Chapter 11
	§	
BRIGGS & STRATTON	§	Case No. 20-43597-399
CORPORATION, <i>et al.</i> ,	§	
	§	(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-FOURTH
OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY)**

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**”) on grounds that such claims

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

should be disallowed as the Debtors' books and records indicate no liability with respect to such claims (the "**Claims**" attached hereto as **Exhibit A**).

In further support of the Objection, attached hereto as **Exhibit B** is the *Declaration of Alan D. Halperin in Support of Plan Administrator's Twenty-Fourth Omnibus Objection to Claims (No Liability)* (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**"). 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 assets² to Bucephalus Buyer, LLC (the "**Purchaser**") and

² *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].

on September 21, 2020, the Debtors closed the Sale Transaction.³ 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 of the Debtors (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.

5. On February 12, 2020, 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.

³ 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].

Relief Requested

7. Pursuant to section 502(b) of the Bankruptcy Code, Bankruptcy Rule 3007(d)(6), and Local Rule 3007(C), the Plan Administrator respectfully requests entry of an order (the “**Proposed Order**”)⁴ disallowing the Claims listed on **Exhibit A** each as described therein.

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 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.

⁴ Copies of the Proposed Order will be made available on the Debtors’ case information website at <http://www.kccllc.net/Briggs>.

11. The Plan Administrator’s professionals and consultants have maintained books and records that reflect, among other things, the Debtors’ liabilities and the amounts thereof owed to their creditors (the “**Books and Records**”). The Plan Administrator and his professionals are reviewing and reconciling Proofs of Claim filed by creditors with the Books and Records as well as the Debtor’s Schedules. In connection therewith, the Plan Administrator and his professionals have reviewed the Claims filed by individuals and entities listed on **Exhibit A** (collectively, the “**Claimants**”) and have concluded each Claim is appropriately objected to as the Debtors have no liability for such Claim, as described more fully on **Exhibit A**.

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 Plan Administrator is objecting to the claims listed on **Exhibit A** because the Plan Administrator believes that such Claims overstate the amount of liability owed by the Debtors and/or because such Claims fail to include sufficient documentation to support the full amount asserted. After reviewing each Claim together with the Books and Records and consulting with certain of the Debtors' former principals, the Plan Administrator has determined that the amount of each Claim should be disallowed for the reasons set forth on **Exhibit A**.

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; and (iv) 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.

WHEREFORE, the Plan Administrator respectfully request 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 31, 2021
St. Louis, Missouri

Respectfully submitted,

CARMODY MACDONALD P.C.

/s/ Robert E. Eggmann

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-and-

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Counsel to the Plan Administrator

EXHIBIT A

Schedule of Claims

Exhibit A
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
1) B & S 1712 3PI Uwc Carson Ca - Universal Warehouse Co 2850 E Del Amo Blvd Compton, CA 90221-6007	20-43597	Briggs & Stratton Corporation	1174	9/23/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$37,977.24 Total: \$37,977.24	This claim is amended and superseded by claim #2595 filed on July 14, 2021. For the avoidance of doubt, the Debtors are not objecting to claim #2595 as part of this claims objection.
2) Barbara Nelson Hinds 642 Hedwig Road Houston, TX 77024	20-43597	Briggs & Stratton Corporation	2593	6/28/2021	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	This is a claim for lost value of equity. The Debtors have no liability for such interests, which were cancelled under the confirmed plan of liquidation.
3) Brandon, Gerald (Estate Of) Richard H. Offutt, Jr. c/o Hoffman, Comfort, Offutt, Scott & Halstad, LLP 24 North Court Street Westminster, MD 21157	20-43597	Briggs & Stratton Corporation	1709	9/28/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$1,250,000.00 Total: \$1,250,000.00	Proof of claim alleges damages in the amount of \$1.25 million for personal injury/wrongful death but attaches no information in support of the claim or how one or more of the Debtors has been proven to be liable for these damages.
4) Chianti Butler 703 Ailey Lothair Rd Mount Vernon, GA 30445	20-43597	Briggs & Stratton Corporation	734	9/23/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$10,000.00 Total: \$10,000.00	Proof of claim of an employee who alleges damages in the amount of \$10,000 for wrongful termination. Claim attaches no EEOC complaint or other information in support of the claim.
5) Darrin And Sheila Begley Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1029	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00	Proof of claim alleges damages in the amount of \$50,000 for wrongful death but attaches no information in support of the claim or how one or more of the Debtors has been proven to be liable for these damages.
6) David R. Cloutier 8 Brentwood Circle Saco, ME 04072	20-43597	Briggs & Stratton Corporation	2010	10/1/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$36,015.37 Total: \$36,015.37	This is a claim for lost value of equity. The Debtors have no liability for such interests, which were cancelled under the confirmed plan of liquidation.
7) Dewayne Pogue 242 Old 280 Hwy Camp Hill, AL 36850	20-43597	Briggs & Stratton Corporation	641	9/14/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	The Proof of Claim alleges damages of \$0 and does not reference this as being an unliquidated amount; however out of an abundance of caution, the Plan Administrator objects in order to confirm creditor asserts \$0 against the estates. Claimant has not provided information in support of how one or more of the Debtors has been proven to be liable for damages of any kind.
8) Eric T. Chack Eric Chack W340N4811 Township Rd O Nashotah, WI 53058	20-43597	Briggs & Stratton Corporation	531	9/8/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$1,665,277.00 Total: \$1,665,277.00	This is a claim in part for lost value of equity, which equity was cancelled under the confirmed plan of liquidation. The balance of the claim asserts damages for alleged misrepresentations to Claimant by the Debtors, which are wholly unproven.
9) Jerry D Waid 3595 E Elswood Idaho Falls, ID 83402	20-43597	Briggs & Stratton Corporation	1842	9/29/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$1,934.60 Total: \$1,934.60	This is a claim for lost value of equity. The Debtors have no liability for such interests, which were cancelled under the confirmed plan of liquidation.
10) John B. Leonard Weitz & Luxenberg P.C. 700 Broadway New York, NY 10003	20-43597	Briggs & Stratton Corporation	1430	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Proof of claim asserts asbestos related personal injury in an unliquidated amount but attaches no information in support of the claim or how one or more of the Debtors has been proven to be liable for these damages.

Exhibit A
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		
11) John Ford N17 W26865 East Fieldhack Drive, Apt. C Pewaukee, WI 53072	20-43597	Briggs & Stratton Corporation	210	9/8/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$2,000,000.00 Total: \$2,000,000.00		Proof of claim alleges damages in the amount of \$2 million for discrimination based on age (48), race (Caucasian), sex (male) and disability (depression) but attaches no information in support of the claim or how one or more of the Debtors has been proven to be liable for these damages.
12) Joyce Franchett c/o Sara Salger The Gori Law Firm 156 N Main Street Edwardsville, IL 62025	20-43597	Briggs & Stratton Corporation	1370	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		The Proof of Claim alleges damages of \$0 and does not reference this as being an unliquidated amount; however out of an abundance of caution, the Plan Administrator objects in order to confirm creditor asserts \$0 against the estates. Claimant claim is believed to be associated with asbestos for which the date of fist exposure would invoke an "all sums" insurance policy.
13) Keith And Carole Chirgwin 1810 30th Ave W Seattle, WA 98199	20-43597	Briggs & Stratton Corporation	2013	10/1/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$14,925.00 Total: \$14,925.00		This is a claim for lost value of equity. The Debtors have no liability for such interests, which were cancelled under the confirmed plan of liquidation.
14) Kurt L Martin 73 Woodridge Lane Murray, KY 42071	20-43597	Briggs & Stratton Corporation	1098	10/4/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$13,650.00 Unsecured: \$51,278.71 Total: \$64,928.71		This claim was filed on 10/4/20 and asserted a total claim of \$78,578.71 of which \$13,650 was asserted as priority. Later in the same day, claim 1098-2 was filed, acknowledging that the \$13,650 priority amount had already been paid and only the remaining \$64,928.71 general unsecured claim was outstanding. The Debtors assert no liability for claim no. 1098-1 in light of the amendment. For the avoidance of doubt, claim no. 1098-2 is not affected by this objection.
15) Larry G. Salsbury 19115 Thomson Drive #203 Brookfield, WI 53045-5188	20-43597	Briggs & Stratton Corporation	369	9/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		Claim is filed by a beneficial bondholder and is therefore duplicative of a master Proof of Claim filed by the Indenture Trustee for such bondholder (claim 856 filed against Briggs & Stratton Corporation, case number 20-43597). To the extent that the proof of claim asserts a non-duplicative claim for unmaturred interest, that portion of the claim should be disallowed under section 502(b)(2) of the Bankruptcy Code.
16) Lewis Alexander c/o Jon C. Goldfarb Wiggins Childs Pantazis Fisher Goldfarb LLC 301 19 St N Birmingham, AL 35203	20-43597	Briggs & Stratton Corporation	448	9/1/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		Claimant filed a complaint with the EEOC alleging discrimination. EEOC declined to pursue and released the cause of action to Claimant who brought a Federal action that has been dismissed. Claimants allegations do not satisfy burden of proof that Debtors are liable for these damages.
17) Lewis Alexander c/o Jon C. Goldfarb Wiggins Childs Pantazis Fisher Goldfarb LLC 301 19 St N Birmingham, AL 35203	20-43597	Briggs & Stratton Corporation	1233	9/18/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		Claimant filed a complaint with the EEOC alleging discrimination. EEOC declined to pursue and released the cause of action to Claimant who brought a Federal action that has been dismissed. Claimants allegations do not satisfy burden of proof that Debtors are liable for these damages.
18) Linda R. George 2942 El Dorado Dr. Medford, OR 97504	20-43597	Briggs & Stratton Corporation	2009	10/1/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$15,223.50 Total: \$15,223.50		This is a claim for lost value of equity. The Debtors have no liability for such interests, which were cancelled under the confirmed plan of liquidation.
19) Marci Joy Ashton 10563 S Sandy Sage Way Sandy, UT 84070-1342	20-43597	Briggs & Stratton Corporation	2590	6/6/2021	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$15,000.00 Total: \$15,000.00		Claim is filed by a beneficial bondholder and is therefore duplicative of a master Proof of Claim filed by the Indenture Trustee for such bondholder (claim 856 filed against Briggs & Stratton Corporation, case number 20-43597). To the extent that the proof of claim asserts a non-duplicative claim for unmaturred interest, that portion of the claim should be disallowed under section 502(b)(2) of the Bankruptcy Code.
20) Michael Gayle Leonard Legal Group, LLC 165 Washington Street Morristown, NJ 07960-0796	20-43597	Briggs & Stratton Corporation	331	9/1/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$1,000,000.00 Total: \$1,000,000.00		Proof of claim alleges damages in the amount of \$1 million for personal injury but attaches no information in support of the claim or how one or more of the Debtors has been proven to be liable for these damages.

Exhibit A
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	
21) Peter Barniak, Estate Representative For Theodore Barniak Weitz & Luxenberg P.C. 700 Broadway New York, NY 10003	20-43597	Briggs & Stratton Corporation	1419	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		Proof of claim asserts asbestos related personal injury in an unliquidated amount but attaches no information in support of the claim or how one or more of the Debtors has been proven to be liable for these damages.
22) Randall M. Brogdon Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1031	10/2/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00		The Debtors were dismissed from the litigation underlying the claim, with no resulting liability for the Debtors.
23) Rex Astle 455 Dale Dr Idaho Falls, ID 83402	20-43597	Briggs & Stratton Corporation	1903	9/30/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$3,174.44 Total: \$3,174.44		This is a claim for lost value of equity. The Debtors have no liability for such interests, which were cancelled under the confirmed plan of liquidation.
24) Rosemary Jones, On Behalf Of Giacomo Grassi, Decd c/o Sara Salger The Gori Law Firm 156 N. Main Street Edwardsville, IL 62025	20-43597	Briggs & Stratton Corporation	1026	10/2/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$40,000.00 Total: \$40,000.00		The Debtors were dismissed from the litigation underlying the claim, with no resulting liability for the Debtors.
25) Scott Carl Podella Scott Podella W277 N4862 Jessy Ct Pewaukee, WI 53072	20-43597	Briggs & Stratton Corporation	1284	9/21/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$48,852.00 Total: \$48,852.00		This claim was filed on 9/21/20 and is an exact duplicate of claim no. 1065 filed on 10/3/20, which has been allowed per Docket No. 1857. The Debtors assert no liability for claim no. 1284 in light of the allowance of claim no. 1065.
26) Steven Mertens 4371 Roberts Lake Rd. Laona, WI 54541	20-43597	Briggs & Stratton Corporation	549	9/14/2020	Secured: \$0.00 Administrative: \$1,270.80 Priority: \$0.00 Unsecured: \$0.00 Total: \$1,270.80		This is a claim for lost value of equity. The Debtors have no liability for such interests, which were cancelled under the confirmed plan of liquidation.
27) Thomas C. Varrelmann S108 W37150 Draper Rd Eagle, WI 53119	20-43597	Briggs & Stratton Corporation	2583	4/12/2021	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$2,568.56 Total: \$2,568.56		This is a claim for lost value of equity. The Debtors have no liability for such interests, which were cancelled under the confirmed plan of liquidation.
28) Visakay, Aida Edward Capozzi c/o Brach Eichler, LLC 101 Eisenhower Parkway Roseland, NJ 07068	20-43597	Briggs & Stratton Corporation	1739	9/28/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$10,000,000.00 Total: \$10,000,000.00		Proof of claim alleges damages in the amount of \$10 million for personal injury but attaches no information in support of the claim or how one or more of the Debtors has been proven to be liable for these damages.

EXHIBIT B

Halperin Claims Declaration

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION**

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

**DECLARATION OF ALAN D. HALPERIN
IN SUPPORT OF PLAN ADMINISTRATOR'S TWENTY-
FOURTH OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY)**

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, but not limited to, the 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-Fourth Omnibus Objection to Claims (No Liability)* (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 Claim, all documentation provided by the claimant with respect to each Claim, the Debtors' respective books and records, and the Schedules, and have determined that each Claim 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 31, 2021

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