

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: January 13, 2022
	§ Hearing Time: 2:00 p.m. (Central Time)
	§ Hearing Location: Courtroom 5 North
	§ 111 S. 10th St., St. Louis, MO 63102

**NOTICE OF THE PLAN ADMINISTRATOR’S
THIRTIETH 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 JANUARY 6, 2022.

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 proposed order (individually, a “**Claim**” and collectively, the “**Claims**”).

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 January 6, 2022** (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 **January 13, 2022 at 2:00 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: November 22, 2021
St. Louis, Missouri

CARMODY MACDONALD P.C.

/s/ Robert E. Eggmann

Robert E. Eggmann, #37374MO
Christopher J. Lawhorn, #45713MO
Thomas H. Riske, #61838MO
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Telephone: (314) 854-8600
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thr@carmodymacdonald.com

Local Counsel to the Plan Administrator

-and-

HALPERIN BATTAGLIA BENZIJA LLP
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Email: jgoldberg@halperinlaw.net
cessinfeld@halperinlaw.net

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		As Stipulated		Modified Claim Amount and Priority		Basis for Proposed Modification
					Claim Amount and Priority	Claim Amount and Priority	Claim Amount and Priority	Claim Amount and Priority			
1) Ohio Bureau of Workers Compensation Legal Division Bankruptcy Unit PO Box 15567 Columbus, OH 43215-0567	20-10575	Billy Goat Industries, Inc.	120	11/18/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$117.01 Unsecured: \$0.00 Total: \$117.01	Secured: \$0.00 Administrative: \$0.00 Priority: \$117.01 Unsecured: \$0.00 Total: \$117.01	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Satisfied.
2) Dean C. And Janine M. Black Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1030	10/2/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	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.
3) Elofic Industries Limited J. Talbot Sant, Jr. 1610 Des Peres Road, Ste 100 St. Louis, MO 63131	20-43597	Briggs & Stratton Corporation	1412	10/5/2020	Secured: \$0.00 Administrative: \$138,929.00 Priority: \$0.00 Unsecured: \$158,319.04 Total: \$297,248.04	Secured: \$0.00 Administrative: \$138,929.00 Priority: \$0.00 Unsecured: \$158,319.04 Total: \$297,248.04	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	This claim was amended and superseded claim #1412 filed on 10/6/2020.
4) Elofic Industries Limited J. Talbot Sant, Jr. 1610 Des Peres Road, Ste 100 St. Louis, MO 63131	20-43597	Briggs & Stratton Corporation	1412	10/5/2020	Secured: \$0.00 Administrative: \$138,929.00 Priority: \$0.00 Unsecured: \$158,319.04 Total: \$297,248.04	Secured: \$0.00 Administrative: \$138,929.00 Priority: \$0.00 Unsecured: \$158,319.04 Total: \$297,248.04	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	This claim was amended and superseded claim #1412 filed on 10/6/2020.
5) Heather Barks C/O Therese A. Schellhammer 123 South Second PO Box 1226 Poplar Bluff, MO 63902-1226	20-43597	Briggs & Stratton Corporation	1553	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$674.40 Unsecured: \$0.00 Total: \$674.40	Secured: \$0.00 Administrative: \$0.00 Priority: \$674.40 Unsecured: \$0.00 Total: \$674.40	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Satisfied.
6) Kimberly Barron C/O Therese A. Schellhammer 123 South Second PO Box 1226 Poplar Bluff, MO 63902-1226	20-43597	Briggs & Stratton Corporation	1558	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$1,517.40 Unsecured: \$0.00 Total: \$1,517.40	Secured: \$0.00 Administrative: \$0.00 Priority: \$1,517.40 Unsecured: \$0.00 Total: \$1,517.40	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Satisfied.
7) Laura Smyser C/O E. Kos Beckman Lawson, LLP 201 West Wayne Street Fort Wayne, IN 46802	20-43597	Briggs & Stratton Corporation	2139	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	The claim is related to litigation, for which the Debtors were dismissed with prejudice from the underlying case.
8) 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	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Withdrawn by stipulation.
9) Linda F. Head C/O Therese A. Schellhammer 123 South Second PO Box 1226 Poplar Bluff, MO 63902-1226	20-43597	Briggs & Stratton Corporation	1457	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$1,236.40 Unsecured: \$0.00 Total: \$1,236.40	Secured: \$0.00 Administrative: \$0.00 Priority: \$1,236.40 Unsecured: \$0.00 Total: \$1,236.40	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Satisfied.
10) Luke Davidson C/O Therese A. Schellhammer 123 South Second PO Box 1226 Poplar Bluff, MO 63902-1226	20-43597	Briggs & Stratton Corporation	1562	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$1,348.80 Unsecured: \$0.00 Total: \$1,348.80	Secured: \$0.00 Administrative: \$0.00 Priority: \$1,348.80 Unsecured: \$0.00 Total: \$1,348.80	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Satisfied.
11) Michelle Spencer, Administrator of the Estate Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1637	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	The claimant attached insufficient support to validate the claim.
12) Mississippi Department of Revenue Bankruptcy Section PO Box 22808 Jackson, MS 39225-2808	20-43597	Briggs & Stratton Corporation	2528	12/8/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	The Debtors' books and records show no resulting liability to the claimant.
13) Mitchel Barks c/o Therese A. Schellhammer 123 South Second PO Box 1226 Poplar Bluff, MO 63902-1226	20-43597	Briggs & Stratton Corporation	1460	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$2,405.00 Unsecured: \$0.00 Total: \$2,405.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$2,405.00 Unsecured: \$0.00 Total: \$2,405.00	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Satisfied.

Exhibit A*Briggs & Stratton Corp., et al.*

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		As Stipulated		Modified Claim Amount and		Basis for Proposed Modification
					Claim Amount and Priority	Priority	Claim Amount and Priority	Priority	Priority	Priority	
14) Ohio Bureau of Workers Compensation Legal Division Bankruptcy Unit PO Box 15567 Columbus, OH 43215-0567	20-43597	Briggs & Stratton Corporation	2304	11/2/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$134.00 Unsecured: \$0.00 Total: \$134.00		Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a		Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		Satisfied.
15) Patricia Kampling 4827 Enchanted Valley Middleton, WI 53562	20-43597	Briggs & Stratton Corporation	2378	10/30/2020	Secured: \$0.00 Administrative: \$110,000.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$110,000.00		Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a		Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		Satisfied.
16) Rhonda Bell C/O Therese A. Schellhammer 123 South Second PO Box 1226 Poplar Bluff, MO 63902-1226	20-43597	Briggs & Stratton Corporation	1601	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$1,292.60 Unsecured: \$0.00 Total: \$1,292.60		Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a		Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		Satisfied.
17) Robin Schmidt and Joann Schmidt Jamie L. Edmonson, Esq. Robinson & Cole LLP 1201 N. Market Street, Suite 1406 Wilmington, DE 19801	20-43597	Briggs & Stratton Corporation	814	9/28/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a		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.
18) Saint-Gobain Performance Plastics Corporation Mark E. Golman Phillips Murrah P.C. 3710 Rawlins Street, Suite 1420 Dallas, TX 75219	20-43597	Briggs & Stratton Corporation	519	9/8/2020	Secured: \$0.00 Administrative: \$5,894.40 Priority: \$0.00 Unsecured: \$0.00 Total: \$5,894.40		Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a		Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		Satisfied.
19) Sopheon Corporation 3001 Metro Drive Ste 460 Bloomington, MN 55425	20-43597	Briggs & Stratton Corporation	2552	12/29/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,703.00 Total: \$50,703.00		Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a		Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		This claim is a duplicate of claim 136 filed on 8/13/2020.
20) State of Wisconsin Department of Revenue Special Procedures Unit PO Box 8901 Madison, WI 53708-8901	20-43597	Briggs & Stratton Corporation	2554	1/11/2021	Secured: \$0.00 Administrative: \$0.00 Priority: \$324,932.82 Unsecured: \$452,219.28 Total: \$777,152.10		Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a		Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		Satisfied.
21) Toyota Industries Commercial Finance, Inc. Charles S. Stahl, Jr. Swanson, Martin & Bell, LLP 2525 Cabot Drive, Suite 204 Lisle, IL 60532	20-43597	Briggs & Stratton Corporation	1699	10/19/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$474,936.92 Total: \$474,936.92		Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a		Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		This claim has been admdened and superseded by claim 1699 filed on 9/1/2021
22) Xprite Usa 13825 Benson Avenue Chino, CA 91710-7022	20-43597	Briggs & Stratton Corporation	781	9/25/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$3,500.00 Total: \$3,500.00		Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a		Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		Satisfied.
23) Wisconsin Department of Revenue Special Procedures Unit PO Box 8901 Madison, WI 53708-8901	20-43597	Briggs & Stratton Corporation	2597	8/13/2021	Secured: \$0.00 Administrative: \$0.00 Priority: \$241,080.17 Unsecured: \$293,012.12 Total: \$534,092.29		Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a		Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		Satisfied.
24) Wisconsin Department of Revenue Special Procedures Unit PO Box 8901 Madison, WI 53708-8901	20-43597	Briggs & Stratton Corporation	2554	8/13/2021	Secured: \$0.00 Administrative: \$0.00 Priority: \$241,080.17 Unsecured: \$293,012.12 Total: \$534,092.29		Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a		Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		Satisfied.
25) Wisconsin Department of Revenue Special Procedures Unit PO Box 8901 Madison, WI 53708-8901	20-43597	Briggs & Stratton Corporation	2554	10/6/2021	Secured: \$0.00 Administrative: \$0.00 Priority: \$258,909.30 Unsecured: \$0.00 Total: \$258,909.30		Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a		Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		Satisfied.

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: January 13, 2022
	§	Hearing Time: 2:00 p.m. (Central Time)
	§	Hearing Location: Courtroom 5 North
	§	111 S. 10th St., St. Louis, MO 63102

**THE PLAN ADMINISTRATOR'S THIRTIETH
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 JANUARY 6, 2022.

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 (collectively, 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 the Plan Administrator's Thirtieth 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 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 (I) Claims Objection Procedures; (II) Claims Hearing Procedures; and (III) 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(d)(6), and Local Rule 3007(C), the Plan Administrator respectfully requests entry of an

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].

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, 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 3,000 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. 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

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

professionals are reviewing and reconciling Proofs of Claim filed by creditors with the Books and Records and the 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** as the Plan Administrator believes that the Wind-Down Estates have no liability for such Claims, either

because such Claims have been satisfied, or because the Debtors' Books and Records show no amount due in tandem with such Claims failing to include sufficient documentation to support the 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 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: November 22, 2021
St. Louis, Missouri

Respectfully submitted,

CARMODY MACDONALD P.C.

/s/ Robert E. Eggmann

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Local Counsel to the Plan Administrator

-and-

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cessenfeld@halperinlaw.net

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		As Stipulated		Modified Claim Amount and Priority		Basis for Proposed Modification
					Claim Amount and Priority	Claim Amount and Priority	Claim Amount and Priority	Claim Amount and Priority			
1) Ohio Bureau of Workers Compensation Legal Division Bankruptcy Unit PO Box 15567 Columbus, OH 43215-0567	20-10575	Billy Goat Industries, Inc.	120	11/18/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$117.01 Unsecured: \$0.00 Total: \$117.01	Secured: \$0.00 Administrative: \$0.00 Priority: \$117.01 Unsecured: \$0.00 Total: \$117.01	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Satisfied.
2) Dean C. And Janine M. Black Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1030	10/2/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	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.
3) Elofic Industries Limited J. Talbot Sant, Jr. 1610 Des Peres Road, Ste 100 St. Louis, MO 63131	20-43597	Briggs & Stratton Corporation	1412	10/5/2020	Secured: \$0.00 Administrative: \$138,929.00 Priority: \$0.00 Unsecured: \$158,319.04 Total: \$297,248.04	Secured: \$0.00 Administrative: \$138,929.00 Priority: \$0.00 Unsecured: \$158,319.04 Total: \$297,248.04	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	This claim was amended and superseded claim #1412 filed on 10/6/2020.
4) Elofic Industries Limited J. Talbot Sant, Jr. 1610 Des Peres Road, Ste 100 St. Louis, MO 63131	20-43597	Briggs & Stratton Corporation	1412	10/5/2020	Secured: \$0.00 Administrative: \$138,929.00 Priority: \$0.00 Unsecured: \$158,319.04 Total: \$297,248.04	Secured: \$0.00 Administrative: \$138,929.00 Priority: \$0.00 Unsecured: \$158,319.04 Total: \$297,248.04	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	This claim was amended and superseded claim #1412 filed on 10/6/2020.
5) Heather Barks C/O Therese A. Schellhammer 123 South Second PO Box 1226 Poplar Bluff, MO 63902-1226	20-43597	Briggs & Stratton Corporation	1553	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$674.40 Unsecured: \$0.00 Total: \$674.40	Secured: \$0.00 Administrative: \$0.00 Priority: \$674.40 Unsecured: \$0.00 Total: \$674.40	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Satisfied.
6) Kimberly Barron C/O Therese A. Schellhammer 123 South Second PO Box 1226 Poplar Bluff, MO 63902-1226	20-43597	Briggs & Stratton Corporation	1558	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$1,517.40 Unsecured: \$0.00 Total: \$1,517.40	Secured: \$0.00 Administrative: \$0.00 Priority: \$1,517.40 Unsecured: \$0.00 Total: \$1,517.40	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Satisfied.
7) Laura Smyser C/O E. Kos Beckman Lawson, LLP 201 West Wayne Street Fort Wayne, IN 46802	20-43597	Briggs & Stratton Corporation	2139	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	The claim is related to litigation, for which the Debtors were dismissed with prejudice from the underlying case.
8) 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	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Withdrawn by stipulation.
9) Linda F. Head C/O Therese A. Schellhammer 123 South Second PO Box 1226 Poplar Bluff, MO 63902-1226	20-43597	Briggs & Stratton Corporation	1457	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$1,236.40 Unsecured: \$0.00 Total: \$1,236.40	Secured: \$0.00 Administrative: \$0.00 Priority: \$1,236.40 Unsecured: \$0.00 Total: \$1,236.40	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Satisfied.
10) Luke Davidson C/O Therese A. Schellhammer 123 South Second PO Box 1226 Poplar Bluff, MO 63902-1226	20-43597	Briggs & Stratton Corporation	1562	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$1,348.80 Unsecured: \$0.00 Total: \$1,348.80	Secured: \$0.00 Administrative: \$0.00 Priority: \$1,348.80 Unsecured: \$0.00 Total: \$1,348.80	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Satisfied.
11) Michelle Spencer, Administrator of the Estate Maune, Raichle, Hartley, French & Mudd, LLC 1015 Locust Street, Suite 1200 St. Louis, MO 63101	20-43597	Briggs & Stratton Corporation	1637	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	The claimant attached insufficient support to validate the claim.
12) Mississippi Department of Revenue Bankruptcy Section PO Box 22808 Jackson, MS 39225-2808	20-43597	Briggs & Stratton Corporation	2528	12/8/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	The Debtors' books and records show no resulting liability to the claimant.
13) Mitchel Barks c/o Therese A. Schellhammer 123 South Second PO Box 1226 Poplar Bluff, MO 63902-1226	20-43597	Briggs & Stratton Corporation	1460	10/5/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$2,405.00 Unsecured: \$0.00 Total: \$2,405.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$2,405.00 Unsecured: \$0.00 Total: \$2,405.00	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00	Satisfied.

Exhibit A
Briggs & Stratton Corp., et al.

Claimant Name and Address	Case Number	Debtor Name	Claim Number	Date Filed	Asserted		As Stipulated		Modified Claim Amount and		Basis for Proposed Modification
					Claim Amount and Priority		Claim Amount and Priority		Priority		
14) Ohio Bureau of Workers Compensation Legal Division Bankruptcy Unit PO Box 15567 Columbus, OH 43215-0567	20-43597	Briggs & Stratton Corporation	2304	11/2/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$134.00 Unsecured: \$0.00 Total: \$134.00		Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a		Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		Satisfied.
15) Patricia Kampling 4827 Enchanted Valley Middleton, WI 53562	20-43597	Briggs & Stratton Corporation	2378	10/30/2020	Secured: \$0.00 Administrative: \$110,000.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$110,000.00		Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a		Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		Satisfied.
16) Rhonda Bell C/O Therese A. Schellhammer 123 South Second PO Box 1226 Poplar Bluff, MO 63902-1226	20-43597	Briggs & Stratton Corporation	1601	10/7/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$1,292.60 Unsecured: \$0.00 Total: \$1,292.60		Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a		Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		Satisfied.
17) Robin Schmidt and Joann Schmidt Jamie L. Edmonson, Esq. Robinson & Cole LLP 1201 N. Market Street, Suite 1406 Wilmington, DE 19801	20-43597	Briggs & Stratton Corporation	814	9/28/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a		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.
18) Saint-Gobain Performance Plastics Corporation Mark E. Golman Phillips Murrah P.C. 3710 Rawlins Street, Suite 1420 Dallas, TX 75219	20-43597	Briggs & Stratton Corporation	519	9/8/2020	Secured: \$0.00 Administrative: \$5,894.40 Priority: \$0.00 Unsecured: \$0.00 Total: \$5,894.40		Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a		Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		Satisfied.
19) Sopheon Corporation 3001 Metro Drive Ste 460 Bloomington, MN 55425	20-43597	Briggs & Stratton Corporation	2552	12/29/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$50,703.00 Total: \$50,703.00		Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a		Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		This claim is a duplicate of claim 136 filed on 8/13/2020.
20) State of Wisconsin Department of Revenue Special Procedures Unit PO Box 8901 Madison, WI 53708-8901	20-43597	Briggs & Stratton Corporation	2554	1/11/2021	Secured: \$0.00 Administrative: \$0.00 Priority: \$324,932.82 Unsecured: \$452,219.28 Total: \$777,152.10		Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a		Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		Satisfied.
21) Toyota Industries Commercial Finance, Inc. Charles S. Stahl, Jr. Swanson, Martin & Bell, LLP 2525 Cabot Drive, Suite 204 Lisle, IL 60532	20-43597	Briggs & Stratton Corporation	1699	10/19/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$474,936.92 Total: \$474,936.92		Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a		Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		This claim has been admdened and superseded by claim 1699 filed on 9/1/2021
22) Xprite Usa 13825 Benson Avenue Chino, CA 91710-7022	20-43597	Briggs & Stratton Corporation	781	9/25/2020	Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$3,500.00 Total: \$3,500.00		Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a		Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		Satisfied.
23) Wisconsin Department of Revenue Special Procedures Unit PO Box 8901 Madison, WI 53708-8901	20-43597	Briggs & Stratton Corporation	2597	8/13/2021	Secured: \$0.00 Administrative: \$0.00 Priority: \$241,080.17 Unsecured: \$293,012.12 Total: \$534,092.29		Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a		Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		Satisfied.
24) Wisconsin Department of Revenue Special Procedures Unit PO Box 8901 Madison, WI 53708-8901	20-43597	Briggs & Stratton Corporation	2554	8/13/2021	Secured: \$0.00 Administrative: \$0.00 Priority: \$241,080.17 Unsecured: \$293,012.12 Total: \$534,092.29		Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a		Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		Satisfied.
25) Wisconsin Department of Revenue Special Procedures Unit PO Box 8901 Madison, WI 53708-8901	20-43597	Briggs & Stratton Corporation	2554	10/6/2021	Secured: \$0.00 Administrative: \$0.00 Priority: \$258,909.30 Unsecured: \$0.00 Total: \$258,909.30		Secured: n/a Administrative: n/a Priority: n/a Unsecured: n/a Total: n/a		Secured: \$0.00 Administrative: \$0.00 Priority: \$0.00 Unsecured: \$0.00 Total: \$0.00		Satisfied.

EXHIBIT B

Halperin Claims Declaration

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION

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

**DECLARATION OF ALAN D. HALPERIN IN
SUPPORT OF THE PLAN ADMINISTRATOR'S THIRTIETH
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 Thirtieth 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: November 22, 2021

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