

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

IN RE:)
) Case No. 11-0536-TBB-9
JEFFERSON COUNTY, ALABAMA)
) Chapter 9 Proceeding
DEBTOR.)

OBJECTION TO DISCLOSURE STATEMENT

Comes Maralyn Mosley ("Mosley"), a judgment creditor, and objects to the to the Amended Chapter 9 Disclosure Statement ("the Disclosure Statement") filed by Debtor and the proposed Amended Chapter 9 Plan of Adjustment ("the Plan") as follows:

1. Plaintiff's claim as a judgment creditor has been duly filed, and a judgment in her favor is a part of her claim, but it is improperly classified by the Debtor.

2. Plaintiff contends that a "controversy has arisen" within the contemplation of Section 2.5 of "the Plan" as classification and dollar amount of her claim.

3. The aforementioned classification controversy



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is the basis for Mosley's objection.

4. "The Plan" acknowledges as Preserved Claims (at Paragraph 7 of its Exhibit A) "[a]ll Causes of Action and Avoidance Actions against contractors, vendors, and former employees related to services to Cooper Green Mercy Hospital, including claims for refunds of payments made pursuant to void contracts."

5. "The Plan" acknowledges as Preserved Claims (at Paragraph 17 of its Exhibit A) "[a]ll Causes of Action, Avoidance Actions, defenses, deductions, assessments, setoffs, recoupment, and other rights under applicable nonbankruptcy law with respect to any Creditor or any Person that are not otherwise released under or pursuant to the Plan.

Respectfully submitted,
S/Joel E. Dillard
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CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of August, 2013 I electronically filed the foregoing with the Clerk of the Court using the CM-ECF system and served same in accordance with the attached Master Service List.

S/Joel E. Dillard

Joel E. Dillard

MASTER SERVICE LIST

VIA CM/ECF:

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via First Class Mail

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Morris & Dickson Co LLC 410 Kay Lane Shreveport, LA 71115	Augmentation, Inc. 3415 Independence Drive, Suite 101 Birmingham, AL 35209-8315
AMT Medical Staffing, Inc. 2 20th Street North Suite 1360 Birmingham, AL 35203	Brice Building Co., LLC 201 Sunbelt Parkway Birmingham, AL 35211
John Plott Company Inc. 2804 Rice Mine Road NE Tuscaloosa, AL 35406	Laboratory Corporation of America 430 South Spring Street Burlington, NC 27215 Attention: Legal Department