

**YOU ARE RECEIVING THESE DOCUMENTS BECAUSE YOUR CLAIM AGAINST BUTH-NA-BODHAIGE, INC., IS BEING CHALLENGED FOR THE REASONS DESCRIBED IN THE ATTACHED OBJECTION. YOU ARE NOT REQUIRED TO RESPOND TO THE OBJECTION, BUT IF YOU DO NOT RESPOND, YOUR CLAIM MAY BE DISALLOWED AS PROVIDED IN EXHIBIT A. YOU SHOULD CONSIDER CONSULTING WITH AN ATTORNEY REGARDING THE OBJECTION AND YOUR RIGHTS. THE AFFECTED CLAIMS ARE LISTED ON EXHIBIT A.**

**RIMON P.C.**  
Counsel to the Chapter 7 Trustee  
Kenneth P. Silverman, Esq.  
100 Jericho Quadrangle Suite 300  
Jericho, New York 11753  
Brian Powers  
Courtney M. Roman

**Hearing Date: July 15, 2025**  
**Time: 10:00 a.m.**

**Objections Due: July 8, 2025**  
**Time: 4:00 p.m.**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In re:

Chapter 7

BUTH-NA-BODHAIGE, INC.,  
Debtor.

Case No.: 24-10392 (DSJ)

-----X  
**NOTICE OF HEARING ON CHAPTER 7 TRUSTEE'S  
FOURTH OMNIBUS OBJECTION TO CLAIMS (DUPLICATIVE CLAIMS)**

**PLEASE TAKE NOTICE THAT**, upon the motion (the "Motion") of Kenenth P. Silverman, the chapter 7 trustee (the "Trustee") for the bankruptcy estate of Buth-Na-Bodhaige, Inc. (the "Debtor"), will move before the Honorable David S. Jones, United States Bankruptcy Judge, for the United States Bankruptcy Court of the Southern District of New York, via Zoom for Government, on **July 15, 2025 at 10:00 a.m.** (the "Hearing"), or as soon thereafter as counsel can be heard, for entry of an order, substantially in the form annexed to the Motion as **Exhibit C**, disallowing the duplicative claims of certain claimants, and granting such further relief as this Court deems just and proper

**PLEASE TAKE FURTHER NOTICE**, that prior to the Hearing, any party wishing to appear at the Hearing is required to register their appearance by 4:00 p.m. one (1) business day in



advance of the Hearing using the Court's eCourt Appearances platform:  
<https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl>.

**PLEASE TAKE FURTHER NOTICE**, that objections to the relief sought in the Motion shall be in writing, conform to the requirements of the Bankruptcy Code, Bankruptcy Rules, and the Local Rules of this Court, must set forth the name of the objecting party, the basis for the objection and the specific grounds therefore, and must be filed electronically with the Bankruptcy Court in accordance with General Order M-399 (General Order M-399 and the User's Manual for the Electronic Case Filing System may be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov), the official website for the Bankruptcy Court) by registered users of the Bankruptcy Court's case filing system, and by all other parties in interest on a disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with courtesy copies delivered directly to Chambers), and must be served upon (i) counsel to the Trustee, Rimon P.C., 100 Jericho Quadrangle, Suite 300, Jericho, New York, 11753, Attn: Brian Powers, Esq. and (ii) The Office of the United States Trustee, Alexander Hamilton Custom House, One Bowling Green, Room 534, New York, New York, 10004-1408, Attn: Mark Bruh, Esq., no later than **July 8, 2025 at 4:00 p.m.**

**PLEASE TAKE FURTHER NOTICE**, that the Hearing may be adjourned without further notice other than the announcement of such adjournment in open Court or by the filing of such notice of adjournment on the docket sheet for the Debtor's case.

**PLEASE TAKE FURTHER NOTICE**, that you need not appear at the Hearing if you do not object to the relief requested in the Motion.

Dated: Jericho, New York  
June 12, 2025

**RIMON P.C.**  
Counsel to Kenneth P. Silverman, Esq.,  
the Chapter 7 Trustee

By: s/ Brian Powers  
Brian Powers  
Partner  
100 Jericho Quadrangle, Suite 300  
Jericho, New York 11753

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**RIMON P.C.**  
Counsel to the Chapter 7 Trustee  
Kenneth P. Silverman, Esq.  
100 Jericho Quadrangle Suite 300  
Jericho, New York 11753  
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UNITED STATES BANKRUPTCY COURT  
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Chapter 7

BUTH-NA-BODHAIGE, INC.,

Case No.: 24-10392 (DSJ)

Debtor.  
-----X

**CHAPTER 7 TRUSTEE'S FOURTH OMNIBUS**  
**OBJECTION TO CLAIMS (DUPLICATIVE CLAIMS)**

Kenneth P. Silverman, Esq., the chapter 7 trustee (the "Trustee") for the bankruptcy estate of Buth-Na-Bodhaige, Inc. (the "Debtor"), respectfully submits this Fourth Omnibus Objection to Claims (the "Objection") seeking an order disallowing the claims of certain claimants (the "Claimants") as set forth on **Exhibits A** annexed hereto (collectively, the "Objectionable Claims"), because the Objectionable Claims are duplicative of a satisfied claim and no amounts are due to the Claimants, and granting such further relief as this Court deems just and proper, and respectfully represents as follows:

**BACKGROUND**

1. On March 8, 2024 (the "Petition Date"), the Debtor filed a voluntary petition for relief pursuant to chapter 7 of title 11, United States Code (the "Bankruptcy Code").

2. Until March 8, 2024, the Debtor operated as a cosmetic and skin care retailer that is a subsidiary of the Body Shop International Limited, a UK based company. Shortly after TBSI entering administration, the Debtor terminated all of its employees, closed all of its retail locations, and filed this chapter 7 case.

3. On March 9, 2024, Kenneth P. Silverman, Esq., was appointed the interim chapter 7 trustee of the Debtor's estate. On April 9, 2024, the initial section 341 First Meeting of Creditors was held and the Trustee duly qualified and has become the permanent Trustee.

4. By Notice of Possible Payment of Dividends and of Last Date to File Claims (ECF Doc. No. 20) (the "Bar Date Notice"), dated March 14, 2024, the Bankruptcy Court established June 17, 2024 as the deadline by which proofs of claim were required to be filed in this case (the "Bar Date"). The Bar Date Notice was mailed to, among others, all parties contained within the Debtor's Schedules and all those entities who have otherwise indicated an interest in this case.

5. On October 15, 2024, this Court entered an order authorizing the Trustee to file omnibus books and records objections to proofs of claim (ECF doc. No. 128), pursuant to Bankruptcy Code § 502 and Rules 3002 and 3007 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules").

#### **JURISDICTION, VENUE AND STATUTORY PREDICATE**

6. The Court has jurisdiction over this Objection pursuant to 28 U.S.C. §§ 1408 and 1409. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). The statutory predicate for the relief requested herein is 11 U.S.C. §§105 and 502 and Rule 3007 of the Bankruptcy Rules.

#### **RELIEF REQUESTED**

7. By this Objection, the Trustee respectfully seeks the entry of an order disallowing each of the proofs of claim identified on **Exhibit A** attached hereto, on the basis that the amounts

asserted by each Objectionable Claim should be either disallowed because either (i) the Objectionable Claims are duplicative of a satisfied claim and no amounts are due to the Claimants, or (ii) the Objectionable Claims have been amended and superseded by later filed proofs of claim.

### **BASIS FOR OBJECTIONS**

8. Several parties filed multiple of the same duplicative proofs of claim in the Debtor's estate (the "Proofs of Claim").

9. The Trustee has reviewed the Proofs of Claim and determined that certain of the Proofs of Claim filed against each of the Debtor's estate, are in fact assert the same exact Claim in amount and classification as asserted in that Claimant's original Proof of Claim (each, a "Superseding Proof of Claim", and collectively, the "Superseding Proofs of Claim"). Set forth on **Exhibit A** attached hereto is a list of Proofs of Claim that the Trustee has identified as duplicate Proofs of Claim.

10. The duplicate Proofs of Claim arose when a Claimant filed multiple Proofs of Claim against the Debtor's estate in the same nature (e.g. secured, administrative, priority, or unsecured) and/or in the same amount of claim.

11. It is axiomatic, however, that creditors are not entitled to multiple recoveries for a single liability against a debtor. Therefore, the Trustee seeks to eliminate the duplicate Proofs of Claim.

12. The Trustee requests that the Proofs of Claim on **Exhibit A** be disallowed because either (i) the Objectionable Claims are duplicative of a satisfied claim and no amounts are due to the Claimants, or (ii) the Objectionable Claims have been amended and superseded by later filed proofs of claim. Set forth on Exhibit A hereto is a list of Claimants that the Trustee has identified as having filed both a Proof of Claim and one or more duplicate filed claims, along with the

respective claims register number for each Proof of Claim and the corresponding Proof of Claim.

13. With respect to the Claims on **Exhibit A** marked as Superseding Proofs of Claim, the Trustee does not seek any relief through this Objection. The inclusion of the Superseding Proofs of Claim on **Exhibit A**, however, does not reflect any acknowledgment or admission by the Trust or the Trustee as to the ultimate validity of each such claim, and the Trust reserves the right to object to such Proofs of Claim included on **Exhibit A** on other grounds in a different objection.

14. In support of this Objection, the Trustee submits the Declaration of Patrick Carew, consultant of RK Consultants LLC (“RKC”), the Trustee’s financial advisors tasked with analyzing the Proofs of Claim, annexed hereto as **Exhibit B**.

15. Accordingly, the Trustee objects to the original Proofs of Claim and seeks entry of an order disallowing the original Proofs of Claim in their entirety.

#### **RESERVATION OF RIGHTS**

16. The Trustee expressly reserve his right to amend, modify, or supplement this Objection and to file additional objections to the Claims or any other Claims (filed or not) which may be asserted against the Claimants. Should one or more of the grounds for objection stated in this Objection be dismissed, the Trustee reserves his right to object on other stated grounds or on any other grounds that the Trustee and his retained professionals discover.

17. Notice of this Objection has been provided to the Office of the United States Trustee and all holders of Objectionable Claims identified on **Exhibit A** annexed hereto. In light of the nature of the relief requested, the Trustee submits that no other or further notice is necessary.

**WHEREFORE**, the Trustee respectfully request that the Court (i) grant the Objection; (ii)

enter an order substantially in the form annexed hereto as **Exhibit C**, and (iii) grant the Trustee such other and further relief as the Court deems proper and just.

Dated: Jericho, New York  
June 12, 2025

**RIMON P.C.**  
Attorneys for Kenneth P. Silverman, Esq.,  
The Chapter 7 Trustee

By: s/ Brian Powers  
Brian Powers  
Partner  
100 Jericho Quadrangle, Suite 300  
Jericho, New York 11753  
(516) 479-6300



**Exhibit A**

<b>Seq. No.</b>	<b>Claim No.</b>	<b>Creditor' Name and Address</b>	<b>Amount Claimed</b>	<b>Basis for Objection</b>	<b>Relief Sought</b>
1	112	Allied universal Kadian Blanson 1395 University Blvd. Jupiter, FL 33458	\$11,477.40	Claim No. 112 is duplicative of Claim No. 77.	Disallowance
2	16	CRG Financial LLC 84 Herbert Avenue Building B – Suite 202 Closter, NJ 07624	\$32,500.00	Claim No. 16 is duplicative of Claim No. 85.	Disallowance
3	113	Hughes Network Systems, LLC Attn Sean Fleming VP and Assoc. Gen. Counsel 11717 Exploration Lane Germantown, MD 20876	\$86,440.25	Claim No. 113 is duplicative of Claim No. 119.	Disallowance

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:

Chapter 7

BUTH-NA-BODHAIGE, INC.,

Case No.: 24-10392 (DSJ)

Debtor.  
-----X

**DECLARATION OF PATRICK CAREW IN SUPPORT  
OF CHAPTER 7 TRUSTEE'S FOURTH OMNIBUS  
OBJECTION TO CLAIMS (DUPLICATIVE CLAIMS)**

**PATRICK CAREW**, pursuant to 28 U.S.C. §1746, declares under penalty of perjury as follows:

1. I submit this declaration in support of the chapter 7 Trustee's Fourth Omnibus Objection (the "Objection")<sup>1</sup> to certain duplicative filed claims.

2. I am a consultant to RK Consultants LLC ("RKC"), financial advisors to Kenneth P. Silverman, Esq., the chapter 7 trustee of the bankruptcy estate of Buth-Na-Bodhaige, Inc. (the "Debtor"). From a review of the Debtor's books and records, as well as information provided to me by various personnel of the Debtor, I have personal knowledge of the facts set forth herein and, if called to testify, I could and would testify in a manner consistent with this Declaration.

3. In the ordinary course of its business, the Debtor maintained books and records (the "Books and Records") that reflect, among other things, the Debtor's liabilities and the amounts thereof owed to its creditors. I, along with the Trustee's professionals, have reviewed all of the proofs of claim identified on Exhibit A to the Objection (collectively, the "Objectable Claims").

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<sup>1</sup> All capitalized terms not otherwise defined here shall carry the same meaning ascribed to them in the Objection.

4. With respect to each of the Objectionable Claims, the amounts asserted by each Objectionable Claim should be disallowed because the Objectionable Claims are duplicative of a satisfied claim and no amounts are due to the Claimants.

5. Accordingly, I believe that the Court should enter an order disallowing each Objectionable Claim as set forth on Exhibit A to the Objection.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 12, 2025.

*s/ Patrick Carew*  
Patrick Carew

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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Chapter 7

BUTH-NA-BODHAIGE, INC.,

Case No.: 24-10392 (DSJ)

Debtor.  
-----X

**ORDER GRANTING CHAPTER 7 TRUSTEE'S FOURTH  
OMNIBUS OBJECTION TO CLAIMS (DUPLICATIVE CLAIMS)**

Upon the Chapter 7 Trustee's Fourth Omnibus Objection to Claims (Duplicative Claims) (ECF Doc. No. \_\_) (the "Objection") dated June 12, 2025, seeking entry of an order disallowing certain duplicative proofs of claim filed by certain claimants against the Debtor's estate; and upon the declaration of Patrick Carew filed in support of the Objection; and upon the hearing on the Objection held before the Court on July 15, 2025 (the "Hearing") the transcript of which is incorporated herein by reference; and due and proper notice of the Objection and the Hearing having been given to claimants in accordance with the Federal Rules of Bankruptcy Procedure; and it appearing that no further notice need be given or required; and after due deliberation and sufficient cause appearing for the relief requested; it is hereby

**ORDERED**, that the Objection is granted to the extent provided herein; and it is further

**ORDERED**, that each claim identified on Exhibit 1 hereto are hereby disallowed; and it is further

**ORDERED**, that the Trustee are hereby authorized to do such things, expend such funds and execute such documents as to effectuate the terms and conditions of this Order.

Dated: New York, New York  
July \_\_, 2025

\_\_\_\_\_  
HONORABLE DAVID S. JONES  
UNITED STATES BANKRUPTCY JUDGE

**EXHIBIT 1**

<b>Claim No.</b>	<b>Creditor's Name and Address</b>	<b>Amount Claimed</b>	<b>Basis for the Objection</b>	<b>Relief Sought</b>
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