

IN THE UNITED STATES BANKRUPTCY COURT FOR  
THE SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS  
2021 MAY 12 AM 10:31  
SOUTHERN DISTRICT OF INDIANA

IN RE: DANIEL WEBSTER COLLEGE, INC., NO. 16-07209-JMC-7A  
DEBTOR

RS MCCULLOUGH,  
CLAIMANT/INTERESTED PARTY [Claim #734; No. 16-07207]

CLAIMANT'S REPLY AND RESPONSE IN OPPOSITION TO TRUSTEE'S  
2<sup>ND</sup> OMNIBUS OBJECTION TO CLAIMS PURSUANT TO BANKRUPTCY  
RULE 3007 (d) (2) AND NOTICE OF RESPONSE DEADLINE

Comes now the claimant, RS McCullough, and states the following in opposition to notice of disallow of claim:

1. Claimant has only received one notice, as related to the matters herein, despite the same stating it is the "2<sup>nd</sup> Notice". And, this is the first such item of any sort received with the above case number. Heretofore, all items received in regards to ESI/ITT were under the "16-07207" number ["207" case].

2. In late 2016 Claimant received documents connected to filing a claim in the referenced matters. The forms provided listed three [3] case numbers in the same form. Claimant listed all three numbers on the claim of the same and transmitted the form to the addressed the same was directed to for this matter.

ENVELOPE NOT PROVIDED  
 COPIES NOT PROVIDED

3. The exhibit with the instant notice indicates an 'acknowledgment' of an appropriate and correct claim filed in the 207 case. But out beside the same "disallow in full" appears.

4. Claimant hopes this simply means that the Trustee takes the position that the claim is proper for the 207 case but not this instant matter. If that is not the case, then claimant opposes 'full disallow'.

5. If Claimant's claim was submitted by the clerk or otherwise in the wrong case, then the claim should be transmitted to the correct file.

6. The Claimant would suffer a severe detriment if the claim of the same is 'disallowed in full'.

7. A filing error or other duplication, if that is the case, should not allow for Claimant's claim to be denied.

8. Claimant would be the only injured and prejudiced party by a "disallow in full".

9. The dictates of justice require that the claim be considered in the 207 case or other correct file. Otherwise a manifest injustice would be visited upon claimant.

WHEREFORE, all premises considered, claimant prays the Court enter an order and grant the relief requested herein, and for all other good and proper relief.

Respectfully submitted,

RS MCCULLOUGH, Pro Se  
P.O. Box 56201

Little Rock, AR 72215

BY: 

R.S. MCCULLOUGH

### CERTIFICATE OF SERVICE

I, undersigned, do hereby certify that on this May 5, 2021, a copy of the foregoing has been hand delivered, faxed, emailed, ECF or mailed, postage prepaid to the proper address of all parties or all counsel of records for the same as directed in the notice received.

Clerk, United States Bankruptcy Court  
Re: In Re ITT Educational Services, Inc. et al.  
116 U.S. Courthouse  
46 East Ohio Street  
Indianapolis, IN 46204

Deborah J. Caruso, Trustee  
135 N. Pennsylvania Street, Suite 1400  
Indianapolis, IN 46204

By  original signed

mtnform1

RS McCULLOUGH  
MAC ONE CON  
PQ BOX 56201  
LITTLE ROCK,



Little Rock AR DC 722  
WED 05 MAY 2021 AM

Clerk, United States Bankruptcy Court  
Re: In Re ITT Educational Services, Inc. et al.  
116 U.S. Courthouse  
46 East Ohio Street  
Indianapolis, IN 46204