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

IN RE: DANIEL WEBSTER COLLEGE, INC., NO. 16-07208-JMC-7A
DEBTOR

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

FILED
U.S. BANKRUPTCY COURT
INDIANAPOLIS DIVISION
2021 MAY 17 AM 10:33
SOUTHERN DISTRICT
OF INDIANA
KEVIN P. DEWANEY
CLERK

CLAIMANT'S REPLY AND RESPONSE IN OPPOSITION TO TRUSTEE'S
1st 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 received the above referenced notice, as related to the matters herein. 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.

3. The exhibit with the instant notice indicates an 'acknowledgment' of an appropriate and correct claim filed

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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.

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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 10, 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 signature

mtnform1

Veronica Jenkins for
RS McCULLOUGH
MAC ONE CONSULTANTS
PO BOX 56201
LITTLE ROCK, AR 72215

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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

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