

**IN THE
UNITED STATES
BANKRUPTCY COURT
FOR THE MIDDLE
DISTRICT OF ALABAMA**

**CHAPTER SEVEN
CASE NUMBER
10-30631

IN RE:
ALLEGRO LAW, LLC.,
DEBTOR**

**TRUSTEES' MOTION FOR
AUTHORITY TO FILE
OMNIBUS OBJECTIONS TO
CLAIMS PURSUANT TO
RULE 3007(D),
FED.R.BK.PROC.**

COMES NOW the Trustee, Daniel G. Hamm, in the above styled matter and moves this Honorable Court for authority to file omnibus objections to proof of claims pursuant to *Rule 3007(d), Fed.R.Bk.Proc.* in the instant case by stating the following:

1. The above referenced case was filed on March 12, 2011 and the Proof of Claims bar date passed on May 31, 2011.
2. As of June 7, 2011, there are over five thousand proofs of claims filed in this case.
3. A great number of filed claims are denominated with multiple classifications i.e. general unsecured, unsecured priority and secured, which will need to be reclassified by the Trustee. In addition there are a great number of claims

that profess to be secured without reference to any document of instrument supporting such a classification. There are also many claims that assert a priority status without referencing any authority for such a claim.

4. The Trustee is of the opinion that the omnibus provisions of *Rule 3007(c) and (d), Fed.R.Bk.Proc.* or similar provision should be employed to expedite the claims review and objection process so as to expedite the claims adjudication process. The anticipated grounds for objection to claims so filed are not one of the specified reasons listed in *3007(d) Fed.R.Bk.Proc.* allowing the omnibus objection for up to 100 claims with each filing.

5. The Trustee proposes to limit the number of claim objections to 100 objections or less per filing.

6. In an effort to expedite the review and reclassifying of claims the Trustee needs the ability to consolidate a variety of similar claims for objection.

7. The requested omnibus provision will:
- a. promote an efficient use of judicial resources,
 - b. be in the best interest of the Bankruptcy Estate, and
 - c. accelerate the claims review process.

WHEREFORE, the Trustee respectfully moves this Honorable Court to issue an Order allowing the Trustee to file omnibus objections to Creditors' Proof of Claims filed under the Omnibus provision *Rule 3007(c) and (d), Fed.R.Bk.Proc.* or in the alternative set this matter for a hearing.

RESPECTFULLY SUBMITTED on Wednesday the 8th day of June.

2011.

[/s/ Daniel G. Hamm](#)
DANIEL G. HAMM (HAM043)
BANKRUPTCY TRUSTEE

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the foregoing pleading as follows:

By CM/ECF:

Teresa Jacobs, Bankruptcy Administrator

By fax or e-mail

By first class mail, postage prepaid:

DONE this the 8th day of June, 2011.

[/s/ Daniel G. Hamm](#)
DANIEL G. HAMM (HAM043)
BANKRUPTCY TRUSTEE