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December 16, 2015

Honorable Christine M. Gravelle, U.S.B.J.  
United States Bankruptcy Court District of New Jersey  
Clarkson S. Fisher United States Courthouse  
402 East State Street  
Trenton, New Jersey 08608  
*E-Mail: [Chambers\\_of\\_cmg@njb.uscourts.gov](mailto:Chambers_of_cmg@njb.uscourts.gov)*

**Re: Zucker, Goldberg & Ackerman, LLC**  
**Hearing Scheduled for December 18, 2015 at 10:00 a.m.**  
**Case No.: 15-24585 (CMG)**

Dear Judge Gravelle:

We write to provide the Court with a status report concerning the matters listed for hearing in the Zucker Goldberg case for Friday, December 18, 2015 at 10:00 a.m. If it is acceptable to the Court, we believe the hearings should be conducted by way of Court Call, as we do not believe that any of the matters will require lengthy argument before the Court. The following is the status of the various matters listed on Your Honor's calendar:

- **Motion to Reject Executory Contract with Access Information Management.** We do not believe that any party has objected to the rejection of the Access contract per se. The objections which were filed mainly related to the disposition of the records contained in the Access facility. Based upon the foregoing, we will ask that Your Honor enter the Order approving the rejection of the Access Agreement.
- **Motion to Compel Clients to Designate Substitute Counsel.** All objections to this Motion have been resolved, with the exception of the objection filed on behalf of Bank of America. Counsel for Bank of America advises that substitution forms have been delivered to the Debtor on all but four cases. Bank of America indicates that on those four cases, the loans have been paid in full. Based upon the foregoing, the Debtor requests that the Order submitted be entered at the Court's earliest convenience.
- **Response and Cross Motion to Turn Over Client Files, filed by Marguarita Y. Ginzberg on behalf of Mid First Bank.** This matter has been adjourned to January 15, 2016 at 10:00 a.m.

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- **Notice of Proposed Abandonment of Records at Access Storage Facility.** The Debtor believes it has addressed the concern of the Unsecured Creditors' Committee. Forty-two boxes, containing the financial records referenced by counsel for the Creditors' Committee were delivered to McCarter & English earlier this week. The Court had provided certain other lender clients the opportunity to inspect records contained at the Access Facility. We do not believe that any of these clients have availed themselves of that opportunity. The Court had overruled the objection to the abandonment by Carolyn Bailey. Ms. Bailey has recently informed the Court of her intention to appeal such ruling. Based upon the foregoing, the Debtor requests that the Court enter the Order authorizing the abandonment of the records contained at the Access Facility.
- **Motion to Extend filed on behalf of ServiceLink NLS, LLC.** An agreement has been reached, pursuant to which Chase will be providing certain documents and information to ServiceLink. ServiceLink circulated a Consent Order requiring the Debtor to provide certain reports of accounts receivable. The Debtor, through counsel, amended that proposed Consent Order to require ServiceLink to identify funds which ServiceLink has collected directly from the Debtor's clients and to prohibit ServiceLink from using the accounts receivable information provided by the Debtor to interfere with the Debtor's collection of its accounts receivable. We are awaiting word from counsel for ServiceLink as to whether the revised form of Consent Order is acceptable.
- **Motion to Reject Agreements for Lease of Non-Residential Real Property with Bear Mountainside and related Motions.** The Debtor and Bear Mountainside have reached a global settlement, embodied in a Consent Order which will be submitted to the Court. It is the Debtor's hope that the proposed Consent Order will be submitted prior to Friday's hearings.

We respectfully request that Your Honor's Clerk confirm that the hearings will be conducted by way of Court Call, rather than an in person hearing in Newark. Should the Court have any questions with regard to the within status report or require any further information with regard to the hearings, please do not hesitate to have your staff contact the undersigned.

Very truly yours,  
Wasserman, Jurista & Stolz, P.C.



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