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11 UNITED STATES BANKRUPTCY COURT
12
13 NORTHERN DISTRICT OF CALIFORNIA
14
15 SAN FRANCISCO DIVISION

16 In re:

Case No.: 08-32514

17 HELLER EHRMAN LLP,

Chapter 11

18 Debtor.

**NOTICE OF OPPORTUNITY FOR
HEARING ON FOURTH MOTION TO VOID
CLAIMS AND SCHEDULED AMOUNTS OF
CERTAIN CREDITORS (NON-
NEGOTIATED AND RETURNED CHECKS;
RELINQUISHED CLAIMS; CREDITOR OUT
OF BUSINESS; CREDITOR DECEASED;
UNABLE TO LOCATE CREDITOR OR
CREDITOR NONRESPONSIVE)**

**[No hearing will be held unless affected party
responds to this Motion – Bankruptcy Local
Rule 9014-1]**

19
20 **TO THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY JUDGE:**

21 **PLEASE TAKE NOTICE** that pursuant to the confirmed Joint Plan of Liquidation of
22 Heller Ehrman LLP (August 9, 2010) (the “Plan”) and 11 U.S.C. §105(a), the post-confirmation
23 liquidating debtor Heller Ehrman LLP in the above-captioned case (the “Debtor”), by and through
24 its Chapter 11 Plan Administrator, Michael F. Burkart (the “Plan Administrator”) hereby files its
25 fourth motion (the “Motion”) for entry of an order voiding the claims and scheduled amounts of
26 certain creditors (non-negotiated and returned checks; relinquished claims; creditor out of business;
27 unable to locate creditor; creditor deceased, or creditor nonresponsive) and for related relief as set
28 forth below. This Motion is based upon the Motion, the Memorandum of Points and Authorities

1 filed concurrently herewith (the “MPA”), the Declaration of Michael F. Burkart filed concurrently
2 herewith (the “Burkart Decl.”), and *Exhibits 1 through 5* attached to the Burkart Declaration filed
3 concurrently herewith.

4 **PLEASE TAKE FURTHER NOTICE** that creditors and parties in interest should
5 carefully review this Motion, the MPA, the Burkart Declaration, and *Exhibits 1 through 5* attached
6 to the Burkart Declaration. **DUE TO THE VOLUME OF DOCUMENTS, EXHIBITS 1**
7 **THROUGH 5 AS WELL AS OTHER DOCUMENTS FILED IN SUPPORT OF THIS**
8 **MOTION ARE NOT ATTACHED TO THIS NOTICE. TO VIEW ALL OF THE**
9 **DOCUMENTS AND EXHIBITS FILED IN SUPPORT OF THE MOTION, CREDITORS**
10 **SHOULD GO TO www.hellerehrman.com AND REFER TO THE “FOURTH MOTION TO**
11 **VOID CLAIMS” SECTION.** If a creditor or party in interest would prefer either a mail set of all
12 the documents filed in support of this Motion, or emailed pdf’s of said documents, please send a
13 request to akieser@ffwplaw.com

14 **PLEASE TAKE FURTHER NOTICE** that, in accordance with Article 5.36 of the Plan,
15 any party objecting to the treatment of their claim as detailed in *Exhibits 1 through 5* and/or the
16 relief requested in this Motion **must file written opposition and a request for a hearing on the**
17 **Motion with the United States Bankruptcy Court for the Northern District of California and**
18 **serve upon counsel for the Debtor within fourteen (14) calendar days of the date of this notice.**

19 **PLEASE TAKE FURTHER NOTICE** that any objection or request for a hearing must be
20 accompanied by any declarations or memoranda of law the requesting party wishes to present in
21 support of its position. **If no timely opposition is filed to the requested relief or a request for**
22 **hearing, the Court may enter an order granting the relief by default without hearing. In the**
23 **event of timely objection or request for hearing, the Debtor will give at least seven (7) days’**
24 **written notice of the hearing to the objecting or requesting party.**

25 **PLEASE TAKE FURTHER NOTICE** that unless exempted by the Clerk, all attorneys
26 practicing in the Court, including attorneys admitted pro hac vice, are required to file all documents
27 (excluding documents to be placed under seal) electronically via the Court’s Electronic Case Filing
28 system. Objections filed by non-attorneys must be filed in paper with the Court at the following

addresses:

If by mail: 450 Golden Gate Avenue, Mail Box 36099, San Francisco, CA 94102.

If by hand delivery or overnight delivery: 450 Golden Gate Avenue, 18th Floor, San Francisco, CA 94102.

PLEASE TAKE FURTHER NOTICE that any opposition to the Motion must be served upon counsel for the Debtor at the address above in the top left-hand corner of the first page of this Notice as well as on the Office of the United States Trustee, Mike Chow, Assistant U.S. Trustee, 450 Golden Gate Avenue, 5th Floor, Suite #05-0153, San Francisco, CA 94102 and Trevor Ross Fehr, 280 South 1st St. #269, San Jose, CA 94102, and all other parties who have requested post-confirmation notice in accordance with the Plan requirements (parties requesting post-confirmation requests for notice may be obtained by reviewing the Court's docket).

Dated: October 3, 2025

FELDERSTEIN FITZGERALD
WILLOUGHBY PASCUZZI & RIOS LLP

By: /s/ Thomas A. Willoughby
Thomas A. Willoughby
Attorneys for the Post-Confirmation
Liquidating Debtor Heller Ehrman LLP