UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK
MANHATTAN DIVISION

IN RE	CHAPTER 11
RM BAKERY LLC, ET AL. AKA ROLLO MIO ARTISAN BAKERY AKA LEAVEN & COMPANIONS AKA LEAVEN & CO AKA GOOD BREAD	CASE NO. 20-11422-mg JUDGE: Martin Glenn
DEBTOR	

OBJECTION TO CONFIRMATION

Robert W. Griswold, Esq., an attorney admitted to practice in this Court, affirms the following under penalty of perjury:

1. I am an associate with LOGS Legal Group LLP f/k/a Shapiro, DiCaro & Barak, LLC, attorney for Mintaka/Team Funding Solutions, ("Secured Creditor") and am familiar with the facts and circumstances surrounding this matter.

2. Secured Creditor holds a mortgage on the Debtor's real property known as 220 Coster Street, Bronx, NY 10474 (the "Property").

3. Secured Creditor has filed a Proof of Claim reflecting a total claim of $91,035.49 and pre-petition mortgage arrears in the amount of $2,101.44.

4. Mr. Mark Rimer, principal of the Debtor, personally guarantees payment to Secured Creditor.

5. Subsequent to the most recent amended plan, Secured Creditor and the Debtor agreed to acceptable plan treatment.

6. The proposed treatment is, in principal, a lump sum payment to Secured Creditor shortly after confirmation, with the remainder of the amount owed to Secured Creditor on the

Initial Distribution Date. The automatic stay would lift with respect to Secured Creditor on the effective date.

7. The language agreed to explicitly preserves Secured Creditor's rights with respect to the claim.

8. It is Secured Creditor's understanding that the personal guaranty claim against Mr. Rimer would survive the bankruptcy, and would be enforceable for whatever the difference is between the contractual debt and what was received through the bankruptcy.

9. The Debtor filed the third amended plan of reorganization on June 28, 2024 (the "Plan").

10. The Plan proposes treatment which is nearly identical to the language previously agreed to by Secured Creditor, except that the provision preserving Secured Creditor's rights against Mr. Rimer are explicitly limited by the addition of the phrase "until all of the above payments are made".

11. Secured Creditor does not consent to language in the plan wiping out the contractual obligation of the guarantor, Mr. Rimer.

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12. Secured Creditor may be amendable to settle Mr. Rimer's personal guarantee separately from the proposed plan treatment, which would resolve this objection.

WHEREFORE, the undersigned respectfully objects to approval of the Debtor's Disclosure statement and such other and further relief as may be just and proper.

Dated: August 13, 2024
Merrick, NY

/s/ Robert W. Griswold
Robert W. Griswold
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CERTIFICATE OF SERVICE

The undersigned certifies that on August 13, 2024, a copy of Objection to Confirmation was caused to be deposited in an enclosed, properly addressed post-paid envelope, and served by ordinary U.S. Mail, postage prepaid, and/or electronically upon the following:

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Dated: August 13, 2024
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