

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

DRF LOGISTICS, LLC,

Debtor.¹

§
§
§
§
§
§
§
§

Chapter 11

Case No. 24-90447 (CML)

LIQUIDATING AGENT'S SIXTH OMNIBUS OBJECTION TO CLAIMS

THIS IS AN OBJECTION TO YOUR CLAIM. THIS OBJECTION ASKS THE COURT TO DISALLOW THE CLAIM THAT YOU FILED IN THIS BANKRUPTCY CASE. IF YOU OPPOSE THE RELIEF REQUESTED IN THIS OBJECTION, YOU MUST RESPOND IN WRITING. UNLESS OTHERWISE DIRECTED BY THE COURT, YOU MUST FILE YOUR RESPONSE ELECTRONICALLY AT [HTTPS://ECF.TXSB.USCOURTS.GOV/](https://ecf.txsb.uscourts.gov/) WITHIN THIRTY (30) DAYS FROM THE DATE THIS OBJECTION WAS SERVED ON YOU. IF YOU DO NOT HAVE ELECTRONIC FILING PRIVILEGES, YOU MUST FILE A WRITTEN OBJECTION THAT IS ACTUALLY RECEIVED BY THE CLERK WITHIN THIRTY (30) DAYS FROM THE DATE THAT THIS OBJECTION WAS SERVED ON YOU. IF YOU DO NOT FILE A RESPONSE WITHIN 30 DAYS AFTER THE OBJECTION WAS SERVED ON YOU, YOUR CLAIM MAY BE DISALLOWED OR MODIFIED WITHOUT A HEARING.

Eric Kaup, in his capacity as the liquidating agent (the “**Liquidating Agent**”), on behalf of DRF Logistics, LLC (the “**Remaining Debtor**”), as debtor in the above-captioned chapter 11 case, respectfully represents as follows in support of this omnibus objection to claims (the “**Objection**”):

¹ The last four digits of DRF Logistics, LLC’s federal tax identification number are 6861. DRF Logistics, LLC’s mailing address is 3001 Summer Street, Stamford, CT 06926. The chapter 11 case of DRF Logistics, LLC’s affiliate DRF, LLC, Case No. 24-90446, was closed effective as of January 22, 2025. See Case No. 24-90446, Docket No. 13.

Background

1. On August 8, 2024 (the “**Petition Date**”), the Remaining Debtor and its affiliate DRF, LLC (together, the “**Debtors**”)² each commenced with the Court a voluntary case under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”).

2. The Debtors’ chapter 11 cases were jointly administered for procedural purposes pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) and Rule 1015-1 of the Bankruptcy Local Rules for the United States Bankruptcy Court for the Southern District of Texas (the “**Local Bankruptcy Rules**”).

3. On November 25, 2024, the Court entered the *Findings of Fact, Conclusions of Law, and Order Confirming Debtors’ Third Amended Joint Plan Of Liquidation* (Docket No. 530), confirming the *Debtors’ Third Amended Joint Plan of Liquidation* (Docket No. 497) (the “**Plan**”).³ On December 9, 2024, all conditions precedent to consummation of the Plan were satisfied or waived in accordance with Article X of the Plan and the Effective Date occurred. *See Notice of Occurrence of Effective Date for Debtors’ Third Amended Joint Plan of Liquidation* (Docket No. 559) (the “**Notice of Effective Date**”).

Claims Reconciliation

4. On August 9, 2024, the Court appointed Stretto, Inc. (“**Stretto**”) as the Debtors’ claims, noticing, and solicitation agent in the chapter 11 cases. *See Order Authorizing Employment and Retention of Stretto, Inc. as Claims, Noticing, and Solicitation Agent* (Docket No. 39). The claims register prepared and maintained by Stretto in the Debtors’ chapter 11 cases

² “**Debtors**” means, as the context requires, the Debtors prior to or after the effective date of the Plan, including, where applicable, the Wind Down Estates.

³ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Plan.

(the “**Claims Register**”) lists 353 filed proofs of claim as of the date of this Objection (collectively, the “**Proofs of Claim**”).

5. On September 9, 2024, as required by section 521 of the Bankruptcy Code, the Debtors filed their schedules of assets and liabilities (Docket Nos. 208 & 209) (the “**Schedules**”). The Schedules were amended on December 6, 2024 (Docket Nos. 554 & 555). As of the date of this Objection, there are approximately 400 claims listed on the Schedules (collectively, the “**Scheduled Claims**”).

6. On September 16, 2024, the Court established the following deadlines (each, a “**Bar Date**”) for filing proofs of claim in these cases: (a) October 22, 2024 at 5:00 p.m. (prevailing Central time) (the “**General Bar Date**”) for all persons and entities other than governmental units; and (b) February 4, 2025, at 5:00 p.m. (prevailing Central time) for all governmental units (the “**Governmental Bar Date**”). *See Order (I) Establishing Deadlines and Procedures for Filing Proofs of Claim, (II) Approving Form and Manner of Notice Thereof, and (III) Granting Related Relief* (Docket No. 234).

7. The Notice of Effective Date specified that the deadline to file requests for payment of Administrative Expense Claims was December 30, 2024 at 5:00 p.m. (Prevailing Central Time). The Notice of Effective Date also specified that, unless an earlier date was otherwise provided for by an order of the Bankruptcy Court, the deadline to file requests for payment of any Claim based on the rejection of the Debtors’ executory contracts or unexpired leases pursuant to the Plan or otherwise was December 30, 2024 at 5:00 p.m. (Prevailing Central Time).

8. The Liquidating Agent and his advisors have been reviewing and reconciling the Proofs of Claim (including all supporting documentation) and the Scheduled Claims. This process involves, among other things, a comparison of the claims asserted in the

Proofs of Claim with the books and records maintained by the Debtors in the ordinary course of business. In the course of the reconciliation process, the Liquidating Agent and his advisors have identified certain categories of claims that should be reduced, reclassified, modified, disallowed, or expunged.

9. On April 2, 2025, the Liquidating Agent filed the *Motion of Liquidating Agent for Entry of an Order Approving Omnibus Claims Objections Procedures and Substantive Claims Objections* (Docket No. 654) (the “**Claims Objection Procedures Motion**”), seeking to establish procedures for the Liquidating Agent to object to Claims. On May 5, 2025, the Court entered the *Order Approving Omnibus Claims Objection Procedures* (Docket No. 677) (the “**Claims Objection Procedures Order**”), granting the relief requested in the Claims Objection Procedures Motion.

10. Pursuant to the *Order Further Extending Deadline to Object to Claims* (Docket No. 790), the deadline for the Liquidating Agent to object to Claims is July 2, 2026 (the “**Claims Objection Deadline**”). The Liquidating Agent may seek further extensions of the Claims Objection Deadline, as necessary.

Jurisdiction and Venue

11. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. § 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b). Venue in this Court is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

Relief Requested

12. By this Objection, the Liquidating Agent respectfully requests authority to disallow the claims listed on the schedule annexed to the Proposed Order (as defined below) (collectively, the “**Disputed Claims**”) for the reasons set forth herein.

13. A proposed form of order granting the relief requested herein is annexed hereto as **Exhibit A** (the “**Proposed Order**”).

14. In support of this Objection, the Debtors submit the declaration of Eric Kaup, the Liquidating Agent, a copy of which is annexed hereto as **Exhibit B** (the “**Kaup Declaration**”).

15. The Liquidating Agent will continue to file omnibus objections to claims if and where warranted.

Basis for Relief

16. Section 502(a) of the Bankruptcy Code provides that any claim for which a proof of claim has been filed shall be deemed allowed unless a party in interest objects thereto. *See* 11 U.S.C. § 502(a). Section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed to the extent that “such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law.” 11 U.S.C. § 502(b)(1).

17. As set forth in Bankruptcy Rule 3001(f), a properly executed and filed proof of claim constitutes *prima facie* evidence of the validity and the amount of the claim asserted therein. *See, e.g., In re Jack Kline Co.*, 440 B.R. 712, 742 (Bankr. S.D. Tex. 2010). A proof of claim loses the presumption of *prima facie* validity under Bankruptcy Rule 3001(f) if an objecting party refutes at least one of the allegations that are essential to the claim’s legal sufficiency. *See In re Fidelity Holding Co., Ltd.*, 837 F.2d 696, 698 (5th Cir. 1988). Once such an allegation is refuted, the burden reverts to the claimant to prove the validity of its claim by a preponderance of the evidence. *Id.* Despite this shifting burden during the claim objection process, “the ultimate burden of proof always lies with the claimant.” *In re Armstrong*, 347 B.R. 581, 583 (Bankr. N.D. Tex. 2006) (citing *Raleigh v. Ill. Dep’t of Rev.*, 530 U.S. 15 (2000)).

18. Bankruptcy Rule 3007 lists certain grounds upon which “objections to more than one claim may be joined in an omnibus objection.” Fed. R. Bankr. Pro. 3007(d). Such grounds include when “the objections are based solely on the grounds that the claims should be disallowed, in whole or in part” because they “(A) duplicate other claims; (B) were filed in the wrong case; (C) have been amended by later proofs of claim; (D) were not timely filed; (E) have been satisfied or released during the case in accordance with the Bankruptcy Code, applicable rules, or a court order; (F) were presented in a form that does not comply with applicable rules and the objection states that the objector is unable to determine the validity of the claim because of the noncompliance; (G) are interests, not claims; or (H) assert a priority in an amount that exceeds the maximum amount allowable under § 507.” Fed. R. Bankr. P. 3007(d).

19. As described below, the grounds for the Liquidating Agent’s objection to the Disputed Claims fall within one of the categories set forth in Bankruptcy Rule 3007, or (i) “seek recovery of amounts for which the Debtors are not liable;” (ii) “are satisfied by payment in full or in part on account of such Claim from a party that is not a Debtor, including one or more of the Debtors’ insurers;” (iii) “are incorrectly or improperly classified under the Bankruptcy Code or under the Plan;” (iv) “are filed against non-Debtors, the wrong Debtor, or against multiple Debtors;” (v) “are disallowed pursuant to section 502 of the Bankruptcy Code;” or (vi) “are inconsistent with the Debtors’ books and records.” Claims Objection Procedures Order Ex. 1 ¶¶ 2(b), (c), (d), (e), (h), and (i).

A. Amended Claims

20. Based on the review of the Claims Register and as set forth in the Kaup Declaration, the Liquidating Agent and his advisors have identified certain Proofs of Claim that were amended by subsequently filed Proofs of Claim (collectively, the “**Amended Claims**”). To avoid the possibility of multiple recoveries by these claimants, the Liquidating Agent respectfully

requests that the Court disallow each Amended Claim listed on **Schedule 1** annexed to the Proposed Order and order them expunged from the Claims Register.

21. For each Proof of Claim to be expunged as an Amended Claim, the Liquidating Agent has identified a surviving claim that supersedes the Amended Claim, which is identified on **Schedule 1**, in the column labeled “Remaining Claim.” Unless objected to on other grounds, the Remaining Claims will be unaffected by the relief requested in this Objection, and the claimants’ rights to assert these liabilities against the applicable Debtor’s estate will be preserved, subject to the Liquidating Agent’s reservation of his right to object to such Remaining Claims on all grounds, whether legal, factual, procedural, substantive, or non-substantive.

B. Superseded Claims

22. Based on the review of the Claims Register and as set forth in the Kaup Declaration, the Liquidating Agent and his advisors have determined that certain scheduled claims have been superseded by subsequently filed Proofs of Claim (collectively, the “**Superseded Claims**”). To avoid the possibility of multiple recoveries by these claimants, the Liquidating Agent respectfully requests that the Court disallow each Superseded Claim listed on **Schedule 2** annexed to the Proposed Order and order them expunged from the Claims Register.

23. For each Proof of Claim to be expunged as a Superseded Claim, the Liquidating Agent has identified a surviving claim that supersedes the Superseded Claim, which is identified on **Schedule 2** to the Proposed Order in the column labeled “Remaining Claim.” Unless objected to on other grounds, the Remaining Claims will be unaffected by the relief requested in this Objection, and the claimants’ rights to assert these liabilities against the applicable Debtor’s estate will be preserved, subject to the Liquidating Agent’s reservation of his right to object to such Remaining Claims on all grounds, whether legal, factual, procedural, substantive, or non-substantive.

C. Fully-Satisfied Claims

24. Based on the review of the Claims Register, the Debtors' books and records, and as set forth in the Kaup Declaration, the Liquidating Agent and his advisors have identified certain Proofs of Claim for amounts that are no longer due and owing to each claimant listed on **Schedule 3** annexed to the Proposed Order, as they have previously been paid by the Debtors or Pitney Bowes Inc. prior to or during these chapter 11 cases (collectively, the "**Fully-Satisfied Claims**"). To avoid the possibility of multiple recoveries by these claimants, the Liquidating Agent respectfully requests that the Court disallow the Fully-Satisfied Claims listed on **Schedule 3** and order them expunged from the Claims Register.

D. Partially-Satisfied Claims

25. Based on the review of the Claims Register, the Debtors' books and records, and as set forth in the Kaup Declaration, the Liquidating Agent and his advisors have identified certain Proofs of Claim for which portions of the Claim amounts are no longer due and owing to each claimant listed on **Schedule 4** annexed to the Proposed Order, as they have previously been paid by the Debtors prior to or during the Debtors' chapter 11 cases (collectively, the "**Partially-Satisfied Claims**"). Modifying the Partially-Satisfied Claims will provide the Liquidating Agent and the affected claimants with certainty regarding the accuracy of each Partially-Satisfied Claim, as well as the correct and controlling amount of each Partially-Satisfied Claim for distribution purposes. To avoid the possibility of multiple recoveries by these claimants, the Liquidating Agent respectfully requests that the Court modify the Partially-Satisfied Claims listed on **Schedule 4**.

26. For each Proof of Claim to be modified as a Partially-Satisfied Claim, the Liquidating Agent has identified a surviving claim, which is identified on **Schedule 4**, in the column labeled "Remaining Claim." Unless objected to on other grounds, the Remaining Claims will be unaffected by the relief requested in this Objection, and the claimants' rights to assert these

liabilities against the applicable Debtor's estate will be preserved, subject to the Liquidating Agent's reservation of his right to object to such Remaining Claims on all grounds, whether legal, factual, procedural, substantive, or non-substantive.

E. Non-Debtor Claims

27. Based on the review of the Claims Register, the Debtors' books and records, and as set forth in the Kaup Declaration, the Liquidating Agent and his advisors have identified certain Proofs of Claim that are properly asserted against non-Debtor entities either in their entirety or in part, which are listed on Schedule 5 annexed to the Proposed Order (collectively, the "**Non-Debtor Claims**"). The Liquidating Agent therefore respectfully requests that the Court disallow the Non-Debtor Claims listed on Schedule 5 in their entirety or in part and order them expunged from the Claims Register.

28. For each Proof of Claim to be expunged as a Non-Debtor Claim, the Liquidating Agent has identified a surviving, properly classified claim, which is identified on Schedule 5, in the column labeled "Remaining Claim." Unless objected to on other grounds, the Remaining Claims will be unaffected by the relief requested in this Objection, and the claimants' rights to assert these amounts against the applicable non-Debtor are preserved, subject to all parties' rights to object to such Remaining Claims on all grounds, whether legal, factual, procedural, substantive, or non-substantive.

F. Improperly Classified Claims

29. Based on the review of the Claims Register and as set forth in the Kaup Declaration, the Liquidating Agent and his advisors have identified certain Proofs of Claim that are incorrectly or improperly classified under the Bankruptcy Code or under the Plan (collectively, the "**Improperly Classified Claims**"). To avoid the possibility of improper or incorrect recoveries by these claimants, the Liquidating Agent respectfully requests that the Court disallow each

Improperly Classified Claim listed on **Schedule 6** annexed to the Proposed Order and order them expunged from the Claims Register.

30. For each Proof of Claim to be expunged as an Improperly Classified Claim, the Liquidating Agent has identified a surviving, properly classified claim, which is identified on **Schedule 6**, in the column labeled “Remaining Claim.” Unless objected to on other grounds, the Remaining Claims will be unaffected by the relief requested in this Objection, and the claimants’ rights to assert these liabilities against the applicable Debtor’s estate will be preserved, subject to the Liquidating Agent’s reservation of his right to object to such Remaining Claims on all grounds, whether legal, factual, procedural, substantive, or non-substantive.

G. Late-Filed Claims

31. Based on the review of the Claims Register and as set forth in the Kaup Declaration, the Liquidating Agent and his advisors have identified certain Proofs of Claim that were filed after the applicable bar date passed (collectively, the “**Late-Filed Claims**”).

32. The Notice of Deadlines for Filing Proofs of Claim (Docket No. 243) (the “**Bar Date Notice**”) was properly served on all claimants listed on **Schedule 7** annexed to the Proposed Order. *See Certificate of Service re: Notice of Deadlines for Filing Proofs of Claim* (Docket No. 268). The Bar Date Notice was also published in The New York Times and the Houston Chronicle. *See Certificate of Publication for the Notice of Deadlines for Filing Proofs of Claim in the New York Times* (Docket No. 289); *Certificate of Publication for the Notice of Deadlines for Filing Proofs of Claim in the Houston Chronicle* (Docket No 290).

33. The claimants that filed the Late-Filed Claims were therefore notified of the dates by which their Proofs of Claim were required to be filed, as well as the consequences of the failure to timely file their Proofs of Claim. Accordingly, the Liquidating Agent respectfully

requests that the Court disallow each Late-Filed Claim listed on **Schedule 7** and order them expunged from the Claims Register.

H. Claims that Should Be Disallowed Pursuant to Section 502 of the Bankruptcy Code

34. Based on the review of the Claims Register and as set forth in the Kaup Declaration, the Liquidating Agent and his advisors have identified certain portions of a filed Proof of Claim that should be disallowed pursuant to section 502 of the Bankruptcy Code (the “**Excess Rejection Damages Claim**”). Under section 502(b)(6) of the Bankruptcy Code, a landlord’s damages claim related to a rejection of such landlord’s lease is limited to the greater of gross rent due for (i) one year or (ii) 15% of the remaining lease term as of the petition date, not to exceed three years. *See* 11 U.S.C. § 502(b)(6)(A) (“the court . . . shall allow such claim in such amount, except to the extent that . . . such claim exceeds the rent reserved by such lease, without acceleration, for the greater of one year, or 15 percent, not to exceed three years, of the remaining term of the lease . . .”). To avoid the possibility of improper or incorrect recoveries by this claimant, the Liquidating Agent respectfully requests that the Court disallow the Excess Rejection Damages Claim listed on **Schedule 8** annexed to the Proposed Order and order it expunged from the Claims Register.

35. For the Proof of Claim to be expunged as an Excess Rejection Damages Claim, the Liquidating Agent has identified a surviving, properly calculated rejection damages claim, which is identified on **Schedule 8**, in the column labeled “Remaining Claim.”⁴ Unless objected to on other grounds, the Remaining Claim will be unaffected by the relief requested in this Objection, and the claimant’s rights to assert these liabilities against the applicable Debtor’s

⁴ The calculations showing the surviving, properly calculated rejection damages claim pursuant to section 502(b)(6) of the Bankruptcy Code are provided in **Schedule 8-A**.

estate will be preserved, subject to the Liquidating Agent's reservation of his right to object to such Remaining Claim on all grounds, whether legal, factual, procedural, substantive, or non-substantive.

I. Inconsistent Books and Records Claims

36. Based on the review of the Claims Register, the Debtors' books and records, and as set forth in the Kaup Declaration, the Liquidating Agent and his advisors have identified certain Proofs of Claim for amounts that are inconsistent with the Debtors' books and records (collectively, the "**Inconsistent Books and Records Claims**"). To avoid the possibility of improper or incorrect recoveries by these claimants, the Liquidating Agent respectfully requests that the Court disallow each Inconsistent Books and Records Claim listed on **Schedule 9** annexed to the Proposed Order and order them expunged from the Claims Register.

Separate Contested Matters

37. Each of the above objections constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. The Liquidating Agent therefore requests that the order entered with respect to this Objection be deemed a separate order with respect to each of the Disputed Claims.

Responses to Omnibus Objection

38. To the extent that any claimant timely files and properly serves a response to the Objection (each, a "**Response**"), and the parties are unable to resolve the issues raised in such Response, the Liquidating Agent requests that the Court schedule the Objection with respect to the relevant Claim(s) for the hearing date set forth in this Objection.

39. To the extent that no Response with respect to a particular Disputed Claim has been timely filed and served, the Liquidating Agent requests that each such Claim is modified or disallowed and expunged, as applicable, from the Claims Register without a hearing.

Reservation of Rights

40. Nothing contained herein is intended to be or shall be deemed as (i) an admission as to the validity of any claim against the Debtors; (ii) a waiver or limitation of the Liquidating Agent's or any party in interest's rights to dispute the amount of, basis for, or validity of any claim, (iii) a waiver or limitation of the Liquidating Agent's or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (iv) a waiver of the obligation of any party in interest to file a proof of claim; (v) an agreement or obligation to pay any claims; or (vi) a waiver of any claims or causes of action that may exist against any creditor or interest holder. The Liquidating Agent expressly reserves all of his rights with respect to the foregoing matters. Likewise, if the Court grants the relief sought herein, any payment made pursuant to the Court's order is not intended to be and should not be construed as an admission to the validity of any claim or a waiver of the Liquidating Agent's or any other party in interest's rights to dispute such claim subsequently.

Notice

41. Notice of this Objection will be served on any party entitled to notice pursuant to Bankruptcy Rule 2002 and any other party entitled to notice pursuant to Bankruptcy Local Rule 9013-1(d).

WHEREFORE, the Liquidating Agent respectfully requests entry of the Proposed Order granting the relief requested herein and such other and further relief as the Court may deem just and appropriate.

Dated: June 15, 2026
Houston, Texas

/s/ Clifford W. Carlson

WEIL, GOTSHAL & MANGES LLP
Gabriel A. Morgan (24125891)
Clifford W. Carlson (24090024)
700 Louisiana Street, Suite 3700
Houston, Texas 77002
Telephone: (713) 546-5000
Facsimile: (713) 224-9511
Email: Gabriel.Morgan@weil.com
Clifford.Carlson@weil.com

/s/ Gianfranco Finizio

LOWENSTEIN SANDLER LLP
Jeffrey L. Cohen (admitted *pro hac vice*)
David M. Posner (admitted *pro hac vice*)
Gianfranco Finizio (admitted *pro hac vice*)
1251 Avenue of the Americas
New York, New York 10020
Telephone: (212) 262-6700
Facsimile: (212) 262-7402
Email: jcohen@lowenstein.com
dposner@lowenstein.com
gfinizio@lowenstein.com

-and-

Co-Counsel to the Liquidating Agent

WEIL, GOTSHAL & MANGES LLP
Ronit J. Berkovich (admitted *pro hac vice*)
Lauren Tauro (admitted *pro hac vice*)
Alexander P. Cohen (24109739)
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Email: Ronit.Berkovich@weil.com
Lauren.Tauro@weil.com
Alexander.Cohen@weil.com

Co-Counsel to the Liquidating Agent

Certificate of Service

I hereby certify that on June 15, 2026, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Clifford W. Carlson

Clifford W. Carlson

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: DRF LOGISTICS, LLC, Debtor. ¹	§ § § § § § § §	Chapter 11 Case No. 24-90447 (CML) Re: Docket No. ____
--	--------------------------------------	---

ORDER GRANTING SIXTH OMNIBUS OBJECTION TO CLAIMS

Upon the objection, dated June 15, 2026 (the “**Objection**”),² of the Liquidating Agent, on behalf of the Remaining Debtor, in the above-captioned chapter 11 case, for entry of an order pursuant to section 502(a) of the Bankruptcy Code, Bankruptcy Rule 3007, and Local Bankruptcy Rule 3007-1, disallowing the claims listed on the schedules annexed to this Order, all as more fully set forth in the Objection; and this Court having jurisdiction to consider the Objection and the relief requested therein pursuant to 28 U.S.C. § 1334; and consideration of the Objection and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Objection having been provided; and such notice having been adequate and appropriate under the circumstances, and it appearing that no other or further notice need be provided; and this Court having reviewed the Objection; and upon any hearing held on the Objection; and all responses, if any, to the Objection have been withdrawn, resolved, or overruled; and this Court having determined that the legal and factual bases set forth in the Objection establish just cause for the

¹ The last four digits of DRF Logistics, LLC’s federal tax identification number are 6861. DRF Logistics, LLC’s mailing address is 3001 Summer Street, Stamford, CT 06926. The chapter 11 case of DRF Logistics, LLC’s affiliate DRF, LLC, Case No. 24-90446, was closed effective as of January 22, 2025. *See* Case No. 24-90446, Docket No. 13.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Objection.

relief granted herein; and it appearing that the relief requested in the Objection is in the best interests of the Debtors and their respective estates and creditors; and upon all of the proceedings had before this Court and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT

1. The Objection is granted as set forth herein.
2. Each Amended Claim identified in **Schedule 1** annexed hereto is disallowed in its entirety for all purposes in these chapter 11 cases and shall be expunged from the Claims Register.
3. Each Superseded Claim identified in **Schedule 2** annexed hereto is disallowed in its entirety for all purposes in these chapter 11 cases and shall be expunged from the Claims Register.
4. Each Fully-Satisfied Claim identified in **Schedule 3** annexed hereto is disallowed in its entirety for all purposes in these chapter 11 cases and shall be expunged from the Claims Register.
5. Each Partially-Satisfied Claim identified in **Schedule 4** annexed hereto is modified for all purposes in these chapter 11 cases, and such modifications shall be reflected on the Claims Register.
6. Each Non-Debtor Claim identified in **Schedule 5** annexed hereto is disallowed in its entirety or in part for all purposes in these chapter 11 cases and shall be expunged from the Claims Register.
7. Each Improperly Classified Claim identified in **Schedule 6** annexed hereto is disallowed in its entirety for all purposes in these chapter 11 cases and shall be expunged from the Claims Register.

8. Each Late-Filed Claim identified in **Schedule 7** annexed hereto is disallowed in its entirety for all purposes in these chapter 11 cases and shall be expunged from the Claims Register.

9. The Excess Rejection Damages Claim identified in **Schedule 8** annexed hereto is disallowed in its entirety for all purposes in these chapter 11 cases and shall be expunged from the Claims Register.

10. Each Inconsistent Books and Records Claim identified in **Schedule 9** annexed hereto is disallowed in its entirety for all purposes in these chapter 11 cases and shall be expunged from the Claims Register.

11. Nothing herein shall constitute an admission or finding concerning the amount or validity of any of the surviving claims identified on **Schedules 1, 2, 4, 5, 6, and 8** attached hereto in the column labeled “Remaining Claim.”

12. To the extent that a Response was filed regarding any Disputed Claim, each such Disputed Claim, and the Objection as it pertains to such Disputed Claim, constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each Disputed Claim.

13. Except as expressly provided otherwise, nothing contained in the Objection or this Order or any payment made pursuant to the authority granted by this Order is intended to be or shall be deemed as (i) an admission as to the validity of any claim against the Debtors, (ii) a waiver of the Liquidating Agent’s or any party in interest’s rights to dispute the amount of, basis for, or validity of any claim, (iii) a waiver or limitation of the Liquidating Agent’s or any party in interest’s rights under the Bankruptcy Code or any other applicable non-bankruptcy law, (iv) a waiver of the obligation of any party in interest to file a proof of claim, (v) an agreement or

obligation to pay any claims, or (vi) a waiver of any claims or causes of action that may exist against any creditor or interest holder.

14. The Liquidating Agent and the Debtors' claims, noticing, and solicitation agent, Stretto, Inc., are authorized to take all actions necessary or appropriate to carry out the relief granted in this Order, including updating the Claims Register to reflect such relief.

15. This Court retains exclusive jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: _____, 2026
Houston, Texas

CHRISTOPHER LOPEZ
UNITED STATES BANKRUPTCY JUDGE

Schedule 1

Amended Claims

Schedule 1
Amended Claims

		Claim to be Disallowed			Remaining Claim		
Ref #	Claimant Name Debtor Name	Claim #	Date Filed	Claim Amount	Claim #	Date Filed	Claim Amount
1	KINGSBRIDGE HOLDINGS LLC DRF, LLC	206	10/22/2024	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$76,616,370.36 Total: \$76,616,370.36	347	01/15/2026	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$69,711,387.12 Total: \$69,711,387.12
2	KTR NJ IV LLC DRF, LLC	344	07/01/2025	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$6,554,507.22 Total: \$6,554,507.22	353	05/28/2026	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$7,089,658.23 Total: \$7,089,658.23

Schedule 2

Superseded Claims

Schedule 2
Superseded Claims

Ref #	Claim to be Disallowed					Remaining Claim				
	Claimant Name	Debtor Name	Scheduled Claim #	Date Filed	Claim Amount	Claimant Name	Debtor Name	Filed Claim #	Date Filed	Claim Amount
1	INNOVATIVE COURIER SOLUTIONS INC	DRF, LLC	2655120	12/6/2024	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$331,688.04 Total: \$331,688.04	NEED IT NOW DELIVERS, LLC	DRF Logistics, LLC	168	10/22/2024	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$336,782.57 Total: \$336,782.57
2	SCANNELL PROPERTIES LLC	DRF, LLC	2664051	12/6/2024	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$228,823.34 Total: \$228,823.34	EXETER 1415 COLLINS, L.P.	DRF, LLC	212	10/29/2024	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$3,901,608.73 Total: \$3,901,608.73
3	LOGISTICS CENTER 11	DRF, LLC	2664034	12/6/2024	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$185,975.29 Total: \$185,975.29	DFW PARK 161 ILP, LLC	DRF, LLC	219	10/30/2024	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$2,196,798.09 Total: \$2,196,798.09

Schedule 3

Fully-Satisfied Claims

Schedule 3
Fully Satisfied Claims

Claim to be Disallowed						
Ref #	Claimant Name	Debtor Name	Claim # / Scheduled Claim #	Date Filed	Claim Amount	Objection Basis
1	HENRY INDUSTRIES, INC. [HENRY FREIGHT SOLUTIONS]	DRF Logistics, LLC	174	10/22/2024	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$513,516.83 Total: \$513,516.83	This claim has been fully satisfied in its entirety as Pitney Bowes Inc. ("PBI") entered into a Settlement Agreement and Release, effective October 22, 2024, pursuant to which the claimant's prepetition claim was fully and finally resolved in exchange for a settlement payment of \$373,226.38 made by PBI.
2	HOUSTON COMM COLL SYSTEM	DRF, LLC	336	02/18/2025	Administrative: \$0.00 Priority: \$0.00 Secured: \$128.24 Unsecured: \$0.00 Total: \$128.24	This is a tax claim that has been satisfied in full; the Debtors remitted payment via check on April 2, 2026.
3	HOUSTON ISD	DRF, LLC	335	02/18/2025	Administrative: \$0.00 Priority: \$0.00 Secured: \$1,157.72 Unsecured: \$0.00 Total: \$1,157.72	This is a tax claim that has been satisfied in full; the Debtors remitted payment via check on April 2, 2026.
4	INFINITY JYLP, LLC	DRF, LLC	2664039	12/6/2024	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$106,874.41 Total: \$106,874.41	This scheduled claim has been fully satisfied pursuant to the <i>Order Granting Debtors Authority to Assume and Assign Unexpired Lease of Nonresidential Real Property</i> (Docket No. 410), which approved the assumption and assignment of the lease on October 28, 2024, effective as of September 30, 2024.
5	POSTNORD AS	DRF Logistics, LLC	2655337	12/6/2024	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$35,164.00 Total: \$35,164.00	This scheduled claim has been satisfied in full; PBI remitted payment on behalf of the Debtors via wire transfer on December 12, 2024.
6	PRO-MED DELIVERY INC. - POST CHAPT. 11	DRF, LLC	21	08/22/2024	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$57,464.42 Total: \$57,464.42	This is a trade claim has been satisfied in full; PBI remitted payment on behalf of the Debtors via wire transfer on October 4, 2024.

Schedule 4

Partially-Satisfied Claims

Schedule 4
Partially Satisfied Claims

Ref #	Claim to be Disallowed					Remaining Claim	
	Claimant Name	Debtor Name	Claim #	Date Filed	Original Claim Amount	Objection Basis	Modified Claim Amount
1	A DUIE PYLE INC	DRF, LLC	55	09/19/2024	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$6,940.13 Total: \$6,940.13	This is a trade claim that has been partially satisfied; the Debtors remitted payment via wire transfer on October 4, 2024.	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$5,244.72 Total: \$5,244.72
2	ACTION AUTOMATIC SPRINKLER INC.	DRF, LLC	196	10/22/2024	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$1,399.50 Total: \$1,399.50	This is a trade claim that has been partially satisfied; the Debtors remitted payment via wire transfer on October 25, 2024.	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$1,149.50 Total: \$1,149.50
3	AQUESST INC	DRF Logistics, LLC	85	10/04/2024	Administrative: \$0.00 Priority: \$15,150.00 Secured: \$0.00 Unsecured: \$109,612.00 Total: \$124,762.00	This is a trade claim that has been partially satisfied; the Debtors remitted payment via wire transfer through multiple payments between October 25, 2024 to November 22, 2024.	Administrative: \$0.00 Priority: \$15,150.00 Secured: \$0.00 Unsecured: \$73,421.50 Total: \$88,571.50
4	ARAMEX NEW YORK	DRF Logistics, LLC	16	08/20/2024	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$581,928.22 Total: \$581,928.22	This is a trade claim that has been partially satisfied; PBI remitted payment on behalf of the debtors via wire transfer through multiple payments between September 27, 2024 to October 4, 2024.	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$517,263.98 Total: \$517,263.98
5	DRAGONFLY SHIPPING PTY LTD	DRF Logistics, LLC	94	10/09/2024	Administrative: \$0.00 AUD Priority: \$0.00 AUD Secured: \$0.00 AUD Unsecured: \$49,204.56 AUD Total: \$49,204.56 AUD	This is a trade claim that has been partially satisfied; the Debtors remitted payment via wire transfer through multiple payments between October 11, 2024 to November 29, 2024.	Administrative: \$0.00 AUD Priority: \$0.00 AUD Secured: \$0.00 AUD Unsecured: \$32,047.95 AUD Total: \$32,047.95 AUD
6	DRIVER STAFFING SOLUTIONS, LLC	DRF, LLC	30	08/29/2024	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$131,208.07 Total: \$131,208.07	This is a trade claim that has been partially satisfied; the Debtors remitted payment via wire transfer through multiple payments between September 27, 2024 to October 4, 2024.	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$116,036.04 Total: \$116,036.04
7	GRANITE STATE SHUTTLE SERVICE	DRF Logistics, LLC	83	10/03/2024	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$91,064.90 Total: \$91,064.90	This is a trade claim that has been partially satisfied; the Debtors remitted payment via wire transfer through multiple payments between September 27, 2024 to October 11, 2024.	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$74,877.92 Total: \$74,877.92
8	J & K TRANSPORT	DRF, LLC	50	09/14/2024	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$21,653.48 Total: \$21,653.48	This is a trade claim that has been partially satisfied; the Debtors remitted payment via wire transfer on September 20, 2024.	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$21,084.20 Total: \$21,084.20
9	MCO EXPRESS ORLANDO INC	DRF, LLC	59	09/20/2024	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$60,443.00 Total: \$60,443.00	This is a trade claim that has been partially satisfied; the Debtors remitted payment via wire transfer on October 11, 2024.	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$45,529.56 Total: \$45,529.56

Schedule 4
Partially Satisfied Claims

Ref #	Claim to be Disallowed					Remaining Claim	
	Claimant Name	Debtor Name	Claim #	Date Filed	Original Claim Amount	Objection Basis	Modified Claim Amount
10	PPF INDUSTRIAL ROYAL SOUTH, LLC	DRF, LLC	220	10/30/2024	Administrative: \$209,728.40 Priority: \$0.00 Secured: \$0.00 Unsecured: \$1,414,198.22 Total: \$1,623,926.62	This is a landlord claim that has been partially satisfied by payment of post-petition rent for the month of September 2024; the Debtors remitted payment via wire transfer on August 30, 2024.	Administrative: \$94,030.71 Priority: \$0.00 Secured: \$0.00 Unsecured: \$1,414,198.22 Total: \$1,508,228.93
11	RA NICHOLS PLUMBING & HEATING LLC	DRF, LLC	130	10/18/2024	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$8,402.39 Total: \$8,402.39	This is a trade claim that has been partially satisfied; the Debtors remitted payment via wire transfer on November 1, 2024.	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$6,937.64 Total: \$6,937.64
12	SECURITY EQUIPMENT INC [SEI]	DRF, LLC	109	10/16/2024	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$121,335.11 Total: \$121,335.11	This is a trade claim that has been partially satisfied; PBI remitted payment on behalf of the Debtors via wire transfer through multiple payments between October 25, 2024 to November 29, 2024.	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$118,680.31 Total: \$118,680.31
13	SUEHR CARGO SERVICES, INC.	DRF Logistics, LLC	13	08/15/2024	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$378,830.51 Total: \$378,830.51	Suehr Cargo Services ("Suehr") asserts a total claim amount of \$378,830.51. However, the properly asserted amount is \$330,937.11, as evinced by the documentation provided by Suehr to the Liquidating Agent on April 20, 2026. After reviewing this documentation, the Liquidating Agent notified Suehr of its corrected claim amount via email correspondence on May 28, 2026. The Liquidating Agent did not receive a response from Suehr regarding the corrected claim amount. In addition, the trade claim has been partially satisfied by wire payment remitted by the Debtors on April 10, 2024, reducing the remaining claim amount to \$286,573.21.	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$286,573.22 Total: \$286,573.22
14	SUEHR CARGO SERVICES, INC.	DRF Logistics, LLC	31	08/29/2024	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$111,205.49 Total: \$111,205.49	Suehr Cargo Services ("Suehr") asserts a total claim amount of \$111,205.49, which was previously reduced from \$129,811.40 pursuant to the <i>Liquidating Agent's Fourth Omnibus Objection to Claims</i> (Docket No. 738). However, the provided invoices were reversed and re-issued with updated balances. Therefore, the properly asserted amount is \$69,416.21. The Liquidating Agent notified Suehr of its corrected claim amount via email correspondence on May 28, 2026. The Liquidating Agent did not receive a response from Suehr regarding the corrected claim amount. In addition, the trade claim has been partially satisfied by wire payment remitted by the Debtors through multiple payments between October 11, 2024 to October 25, 2024, reducing the remaining claim amount to \$37,545.77.	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$37,545.77 Total: \$37,545.77

Schedule 4
Partially Satisfied Claims

Claim to be Disallowed							Remaining Claim
Ref #	Claimant Name	Debtor Name	Claim #	Date Filed	Original Claim Amount	Objection Basis	Modified Claim Amount
15	VERITIV OPERATING COMPANY	DRF, LLC	119	10/18/2024	Administrative: \$38,452.68 Priority: \$0.00 Secured: \$0.00 Unsecured: \$513,877.33 Total: \$552,330.01	This is a trade claim that has been partially satisfied; PBI remitted payment on behalf of the Debtors via wire transfer through multiple payments between October 14, 2024 to November 3, 2024.	Administrative: \$38,452.68 Priority: \$0.00 Secured: \$0.00 Unsecured: \$475,424.65 Total: \$513,877.33

Schedule 5

Non-Debtor Claims

Schedule 5
Non-Debtor Claims

Claim to be Disallowed							Remaining Claim
Ref #	Claimant Name	Debtor Name	Claim #	Date Filed	Original Claim Amount	Objection Basis	Modified Claim Amount
1	HARRIS COUNTY, ET AL	DRF, LLC	8	08/13/2024	Administrative: \$0.00 Priority: \$0.00 Secured: \$80,893.16 Unsecured: \$0.00 Total: \$80,893.16	Harris County asserts a total claim amount of \$80,893.16, which was previously reduced from \$83,682.94 pursuant to the <i>Liquidating Agent's Fifth Omnibus Objection to Claims</i> (Docket No. 771). The remainder of the claim being disallowed relates to invoices billed to Pitney Bowes that belong to non-Debtor entities.	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$0.00 Total: \$0.00
2	JOHNSON CONTROLS SECURITY SOLUTIONS LLC	DRF, LLC	151	10/21/2024	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$13,598.04 Total: \$13,598.04	The portion of the claim being disallowed (\$10,353.07) relates to invoices billed to Pitney Bowes that belong to Pitney Bowes Presort Services, LLC.	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$3,244.97 Total: \$3,244.97

Schedule 6

Improperly Classified Claims

Schedule 6
Incorrectly Classified Claims

Claim to be Disallowed							Remaining Claim
Ref #	Claimant Name	Debtor Name	Claim #	Date Filed	Original Claim Amount	Objection Basis	Modified Claim Amount
1	3150 GEARY ASSOCIATES, LLC	DRF, LLC	210	10/25/2024	Administrative: \$0.00 Priority: \$4,719.97 Secured: \$0.00 Unsecured: \$0.00 Total: \$4,719.97	3150 Geary Associates, LLC ("Geary Associates") filed Proof of Claim No. 210 (the "Geary Associates Claim"), which asserts, in relevant part, that Geary Associates is entitled to \$4,719.97 as a priority claim under 11 U.S.C. § 507(a) as taxes or penalties owed to governmental units. Geary Associates is not entitled to priority tax payments or penalties because it is a pass-through entity as a landlord, not a governmental taxing unit or agency, as is required under Bankruptcy Code section 507. Therefore, the Geary Associates Claim should be disallowed as an Improperly Classified Claim and should be reclassified as a general unsecured claim.	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$4,719.97 Total: \$4,719.97
2	AQUESST INC ¹	DRF Logistics, LLC	85	10/04/2024	Administrative: \$0.00 Priority: \$15,150.00 Secured: \$0.00 Unsecured: \$73,421.50 Total: \$88,571.50	Aquesst Inc ("Aquesst") filed Proof of Claim No. 85 (the "Aquesst Claim") which includes \$15,150.00 asserted on a priority basis on account of "wages, salaries, or commissions earned within 180 days before the bankruptcy petition date." Aquesst does not include any explanation, proof, support, or documentation explaining why its prepetition unsecured claim should be provided priority classification. As such, the Aquesst Claim should be disallowed as an Improperly Classified Claim and should be reclassified as a general unsecured claim.	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$88,571.50 Total: \$88,571.50
3	CIT BANK A DIVISION OF FIRST CITIZEN BANK	DRF Logistics, LLC	221	10/31/2024	Administrative: \$0.00 Priority: \$0.00 Secured: \$55,249.48 Unsecured: \$0.00 Total: \$55,249.48	The four proofs of claim asserted by CIT Bank a Division of First Citizens Bank ("First Citizens"), Proofs of Claims Nos. 221, 222, 223, and 224 (collectively, the "First Citizens Claims"), assert a secured priority status that is inconsistent with the Plan. Article III of the Plan classifies General Unsecured Claims in their own class, defined as "any unsecured Claim, not including any Interdebtor Claims, against any Debtor that is not entitled to priority under the Bankruptcy Code or any Final Order." Plan, Article I. The First Citizens Claims arise from the rejection of the Master Lease Agreement with Verdant Commercial Capital, LLC, as part of the <i>Second Notice of Rejection of Certain Executory Contracts and Unexpired Leases</i> (Docket No. 305). Rejection of unexpired leases gives rise to general unsecured claims pursuant to section 365(g) of the Bankruptcy Code. First Citizens alleges that there are security interests on abandoned equipment in connection with such leases. However, pursuant to the Second Notice of Rejection of Certain Executory Contracts and Unexpired Leases (Docket No. 305) (the "Second Rejection Notice"), which the Debtors filed pursuant to that certain <i>Order (I) Approving Procedures to Reject Executory Contracts and Unexpired Leases and (II) Granting Related Relief</i> (Docket No. 233), the Master Lease Agreement was rejected. Pursuant to the Second Rejection Notice, if any personal property subject to an Other Contract remains on any Leased Premise after the later of the Rejection Date for such Other Contract (each as defined in the Second Rejection Notice) or other date agreed to between the Debtors and applicable lessor, the Debtors shall not be liable for any use or disposal of such remaining property. In October 2024, the Debtors and PBI provided First Citizens with notice of the abandonment of equipment, in connection with the Second Rejection Notice, and First Citizens had indicated that it would seek to recover and sell the equipment and would only pursue claims if there was an amount outstanding after applying any sale proceeds against the claims. The Debtors have not heard from First Citizens since. The security asserted in the First Citizens' Claims is inconsistent with the above. Instead, the First Citizens Claims should be reclassified as general unsecured claims.	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$55,249.48 Total: \$55,249.48
4	CIT BANK A DIVISION OF FIRST CITIZEN BANK	DRF Logistics, LLC	222	10/31/2024	Administrative: \$0.00 Priority: \$0.00 Secured: \$55,249.48 Unsecured: \$0.00 Total: \$55,249.48		Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$55,249.48 Total: \$55,249.48
5	CIT BANK A DIVISION OF FIRST CITIZEN BANK	DRF Logistics, LLC	223	10/31/2024	Administrative: \$0.00 Priority: \$0.00 Secured: \$55,249.48 Unsecured: \$0.50 Total: \$55,249.98		Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$55,249.98 Total: \$55,249.98
6	CIT BANK A DIVISION OF FIRST CITIZEN BANK	DRF Logistics, LLC	224	10/31/2024	Administrative: \$0.00 Priority: \$0.00 Secured: \$55,249.48 Unsecured: \$0.00 Total: \$55,249.48		Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$55,249.48 Total: \$55,249.48
7	CROWN EQUIPMENT CORPORATION [CROWN LIFT TRUCKS]	DRF, LLC	138	10/18/2024	Administrative: \$4,799.90 Priority: \$0.00 Secured: \$13,927.01 Unsecured: \$198,710.76 Total: \$217,437.67	Crown Equipment Corporation ("Crown Equipment") filed Proof of Claim No. 138 (the "Crown Equipment Claim") which includes \$13,927.01 asserted on a secured basis on account of a "secured equipment sale" and "Infolink fair market value." Crown Equipment does not include any explanation, proof, support, or documentation explaining why its prepetition unsecured claim should be provided priority, secured classification. As such, the Crown Equipment Claim should be disallowed as an Improperly Classified Claim and should be reclassified as a general unsecured claim.	Administrative: \$4,799.90 Priority: \$0.00 Secured: \$0.00 Unsecured: \$212,637.77 Total: \$217,437.67
8	SHOPLINE SOLUTIONS LIMITED	DRF Logistics, LLC	105	10/14/2024	Administrative: \$0.00 Priority: \$0.00 Secured: \$50,000.00 Unsecured: \$0.00 Total: \$50,000.00	ShopLine Solutions Limited ("ShopLine") filed Proof of Claim No. 105 (the "ShopLine Claim") in the amount of \$50,000 on a secured basis on account of a prepetition "deposit refund." ShopLine does not include any explanation, proof, support, or documentation explaining why its prepetition unsecured claim should be provided priority, secured classification. As such, the ShopLine Claim should be disallowed as an Improperly Classified Claim and should be properly reclassified as a general unsecured claim.	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$50,000.00 Total: \$50,000.00
9	VISION LINE GROUP LLC	DRF, LLC	231	11/15/2024	Administrative: \$0.00 Priority: \$53,880.28 Secured: \$0.00 Unsecured: \$49.69 Total: \$53,929.97	Vision Line Group LLC ("Vision Line") filed Proof of Claim No. 231 (the "Vision Line Claim") in the amount of \$53,929.97 on an unsecured basis on account of "[p]roject management, drawings, plumbing and concrete work for modular office in Monroe NJ, as well as electrical services." The Vision Line Claim also states that Vision Line is entitled to priority treatment pursuant to 11 U.S.C. § 507(a) in the amount of \$53,880.28. Vision Line does not include any explanation, proof, support, or documentation explaining why its prepetition unsecured claim should be provided priority classification. As such, the Vision Line Claim should be disallowed as an Improperly Classified Claim and should be reclassified as a general unsecured claim.	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$53,929.97 Total: \$53,929.97

1. Aquesst Inc.'s Original Claim Amount reflects the claim amount after reduction for payments previously remitted to the claimant, as set forth in Schedule 4, Partially Satisfied Claims.

Schedule 7

Late-Filed Claims

Schedule 7
Late-Filed Claims

Claim to be Disallowed					
Ref #	Claimant Name	Debtor Name	Claim #	Date Filed	Claim Amount
1	CARROLLTON-FARMERS BRANCH INDEPENDENT SCHOOL DISTRICT	DRF Logistics, LLC	348	02/23/2026	Administrative: \$0.00 Priority: \$0.00 Secured: \$9,818.79 Unsecured: \$0.00 Total: \$9,818.79
2	GRAPEVINE-COLLEYVILLE INDEPENDENT SCHOOL DISTRICT	DRF Logistics, LLC	350	02/16/2026	Administrative: \$0.00 Priority: \$0.00 Secured: \$46,152.19 Unsecured: \$0.00 Total: \$46,152.19

Schedule 8

Excess Rejection Damages Claims

Schedule 8
Excess Rejection Damages Claims

Claim to be Disallowed						Remaining Claim
Ref #	Claimant Name	Debtor Name	Claim #	Date Filed	Original Claim Amount	Modified Claim Amount
1	SOLARWINDS WORLDWIDE, LLC	DRF, LLC	260	01/13/2025	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$4,266,514.03 Total: \$4,266,514.03	Solarwinds Worldwide, LLC ("Solarwinds") filed Proof of Claim No. 260 (the "Solarwinds Claim") seeking lease rejection damages totaling Solarwinds's full remaining lease amount of \$4,266,514.03, instead of applying the rejection damages cap pursuant to section 502(b)(6) of the Bankruptcy Code which limits its recovery to \$1,305,392.85 (consisting of \$1,205,357.36 of one year of rent for rejection damages and \$100,035.49 of prepetition rent owed). As such, the Solarwinds Claim should be reduced by \$2,961,121.18 to account for the section 502(b)(6) cap.
						Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$1,305,392.85 Total: \$1,305,392.85

Schedule 8-A

Excess Rejection Damages Claims – Calculation of Remaining Claims

Schedule 8-A

Month	Base Rent	Additional Rent	Total Rent
31-Oct	\$ 58,536.91	\$ 41,498.58	\$ 100,035.49
30-Nov	58,536.91	41,498.58	100,035.49
31-Dec	58,536.91	41,498.58	100,035.49
31-Jan	58,536.91	41,498.58	100,035.49
28-Feb	58,536.91	41,498.58	100,035.49
31-Mar	58,536.91	41,498.58	100,035.49
30-Apr	58,536.91	41,498.58	100,035.49
31-May	58,536.91	41,498.58	100,035.49
30-Jun	59,769.78	41,498.58	101,268.36
31-Jul	59,769.78	41,498.58	101,268.36
31-Aug	59,769.78	41,498.58	101,268.36
30-Sep	59,769.78	41,498.58	101,268.36
502(b)(6) Cap			\$ 1,205,357.36
August 2024 Prepetition Rent			100,035.49
Total Revised Claim			\$ 1,305,392.85
Solarwinds Original Asserted Claim			\$ 4,266,514.03
Less: Proposed Reduction			(2,961,121.18)
Total Revised Claim			\$ 1,305,392.85

Schedule 9

Inconsistent Books and Records Claims

Schedule 9
Claims Inconsistent with Debtors' Books and Records

	Claim to be Disallowed					
Ref #	Claimant Name	Debtor Name	Claim #	Date Filed	Claim Amount	Objection Basis
1	AARON PITTS	DRF Logistics, LLC	185	10/22/2024	Administrative: \$0.00 Priority: \$0.00 Secured: \$0.00 Unsecured: \$70,592.37 Total: \$70,592.37	Upon review of the Debtors' books and records, including payroll, severance, and benefits records maintained in the ordinary course, the Debtors have determined that Aaron Pitts is not owed the asserted amount under his separation agreement. To the extent that the claim relates to COBRA coverage, the Company's records reflect that COBRA coverage was elected for November 2024 but lapsed effective January 31, 2025 after the claimant failed to pay the January premium. In addition, continued coverage required the claimant to complete the applicable termination packet or contact the benefits administrator directly. Accordingly, the asserted claim should be disallowed in its entirety.
2	CARMEN CHAVEZ LOZANO¹	DRF Logistics, LLC	107	10/15/2024	Administrative: \$2,550.00 Priority: \$2,550.00 Secured: \$0.00 Unsecured: \$0.00 Total: \$2,550.00	Upon review of the Debtors' books and records, including employment, severance, and benefits records maintained in the ordinary course, the Debtors have determined that Carmen Chavez Lozano did not sign and return the applicable severance agreement. As a result, the claimant is not eligible for COBRA medical coverage at the Pitney Bowes Inc. active employee rate because such benefit was conditioned on execution of the severance agreement. Accordingly, the asserted claim should be disallowed in its entirety.
3	ERICA RIEDEMAN	DRF Logistics, LLC	92	10/08/2024	Administrative: \$0.00 Priority: \$819.00 Secured: \$0.00 Unsecured: \$0.00 Total: \$819.00	Upon review of the Debtors' books and records, including payroll records, termination records, and accrued PTO balances maintained in the ordinary course, the Debtors have determined that no accrued but unpaid PTO is owed to Erica Riedeman as of the Petition Date. Additionally, the claimant executed a separation agreement and general release in connection with the termination of her employment, pursuant to which she acknowledged receipt of all compensation owed except as expressly provided therein. Accordingly, the asserted claim should be disallowed in its entirety.
4	ESOHAM ABALO	DRF Logistics, LLC	81	10/03/2024	Administrative: \$0.00 Priority: \$7,200.00 Secured: \$0.00 Unsecured: \$0.00 Total: \$7,200.00	Upon review of the Debtors' books and records, including employment, payroll, and termination records maintained in the ordinary course, the Debtors have determined that Esoham Abalo voluntarily resigned for personal reasons and is not owed any amounts as of the Petition Date. The claim also does not identify a basis for liability or attach documentation supporting the asserted priority amount. Accordingly, the asserted claim should be disallowed in its entirety.
5	JANET MAGDALENO CHAVEZ¹	DRF Logistics, LLC	106	10/15/2024	Administrative: \$2,550.00 Priority: \$2,550.00 Secured: \$0.00 Unsecured: \$0.00 Total: \$2,550.00	Upon review of the Debtors' books and records, including payroll records, termination records, and accrued PTO balances maintained in the ordinary course, the Debtors have determined that no accrued but unpaid PTO is owed to Janet Magdaleno Chavez as of the Petition Date. Additionally, the claimant executed a separation agreement and general release in connection with the termination of her employment, pursuant to which she acknowledged receipt of all compensation owed except as expressly provided therein. Accordingly, the asserted claim should be disallowed in its entirety.
6	OMAR WHEELER	DRF Logistics, LLC	71	10/01/2024	Administrative: \$0.00 Priority: \$15,150.00 Secured: \$0.00 Unsecured: \$222.00 Total: \$15,372.00	Upon review of the Debtors' books and records, including employment, payroll, and termination records maintained in the ordinary course, the Debtors have determined that Omar Wheeler voluntarily resigned from his position and is therefore not entitled to unemployment benefits. Moreover, claimant filed an unemployment claim with the New Jersey Department of Labor on February 11, 2024 that was denied. This decision was later affirmed by the Appeal Tribunal, which found that claimant left work voluntarily without good cause. Accordingly, the asserted claim should be disallowed in its entirety.

1. Carmen Chavez Lozano's and Janet Magdaleno Chavez's proofs of claim assert the same \$2,550.00 amount as both a priority claim and an administrative expense claim. For the avoidance of doubt, such amounts should not be double-counted. The total asserted amount for each such claim is \$2,550.00, not \$5,100.00.

Exhibit B

Kaup Declaration

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: DRF LOGISTICS, LLC, Debtor.¹	§ § § § § § § §	Chapter 11 Case No. 24-90447 (CML)
---	--------------------------------------	---

**DECLARATION OF ERIC KAUP IN SUPPORT OF
SIXTH OMNIBUS OBJECTION TO CLAIMS**

I, Eric Kaup, pursuant to section § 1746 of title 28 of the United States Code, hereby declare under penalty of perjury that the following is true and correct to the best of my knowledge, information, and belief:

1. I am the Liquidating Agent of DRF Logistics, LLC (the “**Remaining Debtor**”), as debtor in the above-captioned chapter 11 case. Additionally, I formerly served as the Debtors’ Chief Restructuring Officer. As a result of this work, I am generally familiar with the Debtors’ operations and affairs, their books and records, and their chapter 11 cases. I submit this declaration (the “**Declaration**”) in support of the *Liquidating Agent’s Sixth Omnibus Objection to Claims* (the “**Objection**”).²

2. Except as otherwise indicated, all statements in this Declaration are based on my personal knowledge of the Debtors’ operations and finances, my discussions with other members of the Debtors’ senior management, the Debtors’ advisors, and members of the Hilco

¹ The last four digits of DRF Logistics, LLC’s federal tax identification number are 6861. DRF Logistics, LLC’s mailing address is 3001 Summer Street, Stamford, CT 06926. The chapter 11 case of DRF Logistics, LLC’s affiliate DRF, LLC, Case No. 24-90446, was closed effective as of January 22, 2025. See Case No. 24-90446, Docket No. 13. “**Debtors**” means, as the context requires, the Debtors prior to or after the effective date of the Plan, including, where applicable, the Wind Down Estates (as defined in the Plan).

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Objection.

team, my review of relevant documents, or my opinion based upon my experience and knowledge of the Debtors' operations. If called to testify, I could and would testify to each of the facts set forth herein based on such personal knowledge, discussions, review of documents, or opinion.

3. I am authorized to execute this Declaration.

4. I have reviewed the Objection, and I am directly, or by and through other personnel or representatives of the Liquidating Agent, reasonably familiar with the information contained therein as well as in the schedules attached to the Proposed Order. The information and assertions contained in the Objection and in the schedules are true and correct to the best of my knowledge, information, and belief.

Amended Claims

5. To the best of my knowledge, information, and belief, the assertions made in the Objection with respect to the Amended Claims are accurate.

6. I, or advisors acting on my behalf, reviewed the Objection, the Amended Claims, the documentation provided with respect to each Amended Claim, and the Claims Register, and have determined that each Amended Claim identified on **Schedule 1** annexed to the Proposed Order was amended by a subsequently filed Proof of Claim.

7. I believe that failure to disallow the Amended Claims would result in the claimants receiving multiple recoveries. As such, disallowance of the Amended Claims in their entirety is appropriate.

8. I also can confirm that each Amended Claim has been superseded by a surviving claim identified on **Schedule 1** in the column labeled "Remaining Claim."

Superseded Claims

9. To the best of my knowledge, information, and belief, the assertions made in the Objection with respect to the Superseded Claims are accurate.

10. I, or advisors acting on my behalf, reviewed the Objection, the Superseded Claims, the documentation provided with respect to each Superseded Claim, and the Claims Register, and have determined that each Superseded Claim identified on **Schedule 2** annexed to the Proposed Order was superseded by a subsequently filed Proof of Claim.

11. I believe that failure to disallow the Superseded Claims would result in the claimants receiving multiple recoveries. As such, disallowance of the Superseded Claims in their entirety is appropriate.

12. I also can confirm that each Superseded Claim has been superseded by a surviving claim identified on **Schedule 2** in the column labeled “Remaining Claim.”

Fully-Satisfied Claims

13. To the best of my knowledge, information, and belief, the assertions made in the Objection with respect to the Fully-Satisfied Claims are accurate.

14. I, or advisors acting on my behalf, reviewed the Objection, the Fully-Satisfied Claims, the documentation provided with respect to each Fully-Satisfied Claim, the Debtors’ books and records, and the Claims Register, and have determined that each Fully-Satisfied Claim identified on **Schedule 3** annexed to the Proposed Order is no longer due and owing and has previously been paid or otherwise satisfied in full.

15. I believe that failure to disallow the Fully-Satisfied Claims would result in the claimants receiving multiple recoveries. As such, disallowance of the Fully-Satisfied Claims in their entirety is appropriate.

Partially-Satisfied Claims

16. To the best of my knowledge, information, and belief, the assertions made in the Objection with respect to the Partially-Satisfied Claims are accurate.

17. I, or advisors acting on my behalf, reviewed the Objection, the Partially-Satisfied Claims, the documentation provided with respect to each Partially-Satisfied Claim, the Debtors' books and records, and the Claims Register, and have determined that certain portions of each Partially-Satisfied Claim identified on **Schedule 4** annexed to the Proposed Order are no longer due and owing and have previously been paid or otherwise satisfied in full.

18. I believe that failure to disallow the previously satisfied portions of the Partially-Satisfied Claims would result in the claimants receiving multiple recoveries. As such, partial disallowance of the Partially-Satisfied Claims is appropriate.

19. I also can confirm that each Partially-Satisfied Claim has been replaced by a surviving claim identified on **Schedule 4** in the column labeled "Remaining Claim."

Non-Debtor Claims

20. To the best of my knowledge, information, and belief, the assertions made in the Objection with respect to the Non-Debtor Claims are accurate.

21. I, or advisors acting on my behalf, reviewed the Objection, the Non-Debtor Claims, the documentation provided with respect to each Non-Debtor Claim, the Debtors' books and records, and the Claims Register, and have determined that each Non-Debtor Claim identified on **Schedule 5** annexed to the Proposed Order is against a non-Debtor entity in their entirety or in part.

22. I believe that failure to disallow the Non-Debtor Claims would result in the claimants receiving improper recoveries. As such, disallowance of the Non-Debtor Claims in their entirety or in part is appropriate.

23. I also can confirm that each Non-Debtor Claim has been replaced by a surviving claim identified on **Schedule 5** in the column labeled “Remaining Claim.”

Improperly Classified Claims

24. To the best of my knowledge, information, and belief, the assertions made in the Objection with respect to the Improperly Classified Claims are accurate.

25. I, or advisors acting on my behalf, reviewed the Objection, the Improperly Classified Claims, the Debtors’ books and records, and the Claims Register, and have determined that each Improperly Classified Claim identified on **Schedule 6** annexed to the Proposed Order improperly classifies unsecured claims as secured or priority claims in a manner inconsistent with the Bankruptcy Code and the terms of the Plan.

26. I believe that failure to disallow the Improperly Classified Claims would result in the claimants receiving improper recoveries. As such, disallowance of the Improperly Classified Claims in their entirety is appropriate, except in those instances where advisors acting on my behalf have determined that such Improperly Classified Claims or portion thereof should be reclassified and allowed as a general unsecured claim.

27. I also can confirm that the Improperly Classified Claims which should be reclassified as general unsecured claims have been replaced by a surviving claim identified on **Schedule 6** in the column labeled “Remaining Claim.”

Late-Filed Claims

28. To the best of my knowledge, information, and belief, the assertions made in the Objection with respect to the Late-Filed Claims are accurate.

29. I, or advisors acting on my behalf, reviewed the Objection, the Late-Filed Claims, the documentation provided with respect to each Late-Filed Claim, the Bar Date Notice, and the Claims Register, and have determined that each Late-Filed Claim identified on **Schedule 7** annexed to the Proposed Order was filed after the date by which a Proof of Claim was required to be filed, and each such claimant was adequately notified of the consequences of the failure to timely file a Proof of Claim.

30. I believe that failure to disallow the Late-Filed Claims would result in the claimants receiving inappropriate recoveries. As such, I believe that the Late-Filed Claims should be disallowed in their entirety and expunged from the Claims Register.

Excess Rejection Damages Claims

31. To the best of my knowledge, information, and belief, the assertions made in the Objection with respect to the Excess Rejection Damages Claim is accurate.

32. I, or advisors acting on my behalf, reviewed the Objection, the Excess Rejection Damages Claim, the Debtors' books and records, the Claims Register, and the calculation of rejection damages performed pursuant to section 502(b)(6) of the Bankruptcy Code provided in **Schedule 8-A**, and have determined that the Excess Rejection Damages Claim identified on **Schedule 8** annexed to the Proposed Order includes improper and excess rejection damages amounts in excess of the amounts provided for under section 502(b)(6) of the Bankruptcy Code.

33. I believe that failure to disallow the Excess Rejection Damages Claim would result in the claimants receiving improper or incorrect recoveries. As such, partial disallowance of the Excess Rejection Damages Claim is appropriate.

34. I also can confirm that the Excess Rejection Damages Claim has been replaced by a surviving claim identified on **Schedule 8** in the column labeled “Remaining Claim.”

Inconsistent Books and Records Claims

35. To the best of my knowledge, information, and belief, the assertions made in the Objection with respect to the Inconsistent Books and Records Claims are accurate.

36. I, or advisors acting on my behalf, reviewed the Objection, the Inconsistent Books and Records Claims, the documentation provided with respect to each Inconsistent Books and Records Claim, the Debtors’ books and records, and the Claims Register, and have determined that each Inconsistent Books and Records Claim identified on **Schedule 9** annexed to the Proposed Order is inconsistent with the Debtors’ books and records.

37. I believe that failure to disallow the Inconsistent Books and Records Claims would result in the claimants receiving improper or incorrect recoveries. As such, disallowance of the Inconsistent Books and Records Claims in their entirety is appropriate.

I declare under penalty of perjury that the foregoing information is true and correct to the best of my knowledge, information, and belief.

Dated: June 15, 2026
Northbrook, Illinois

/s/ Eric Kaup

Name: Eric Kaup

Title: Liquidating Agent

Company: DRF Logistics, LLC