UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:	Chapter 11
RM BAKERY LLC, *et al*.,[1] Debtors.	Case No. 20-11422 (MG) Jointly Administered

DECLARATION OF MARK RIMER IN SUPPORT
OF OBJECTIONS TO PROOFS OF CLAIM NUMBERS 34, 53, 54 AND 10008

I , Mark Rimer, pursuant to section 1726 of title 28 of the United States Code, hereby declare that the following is true to the best of my knowledge, information, and belief:

1. I am the acting CEO of RM Bakery LLC ("**RMB**"), am a certified accountant, and am familiar with the books and records of RMB .

2. I submit this declaration in support of the Debtors' Objections to Proofs of Claim Numbers 34, 53, 54 and 10008 (the "**Objections**") filed contemporaneously herewith[2] and state that the information contained in such Objections, and the exhibits thereto, is true and correct to the best of my knowledge and belief and based on the information and records available to me. If called and sworn as a witness, I could and would testify competently to the matters set forth herein.

3. I assisted in the preparation of the Objections. Through my review, with the assistance of employees under my direction, I am personally and generally familiar with, *inter alia*, RMB's liabilities and the amounts owed to its creditors. I am also generally familiar with the claims register prepared and provided by Epiq in these Chapter 11 Cases (the "**Claims**

[1] The Debtors in these Chapter 11 Cases and the last four digits of each Debtor's taxpayer identification number are as follows: RM Bakery LLC (7954) and BKD Group LLC (0624).
[2] All capitalized terms used but not defined herein shall have the same meaning ascribed to it in the Objections.

Register").

4. With the help of my employees and professionals, I have been reviewing and analyzing RMB's Books and Records, including the Debtors' Schedules of Assets and Liabilities and Statements of Financial Affairs, their accounts payable, the Claims Register, and the individual Proofs of Claim, to determine to which claims the Debtors should object.

5. I have determined that the amounts set forth in Proofs of Claim Nos. 34 and 10008 do not match and are not supported by the Debtors' Books and Records. As to Claim 34, the Books and Records do not show any amounts owed to US Foods Inc. Moreover, the Debtors are not aware of any contractual liability the Debtors owe to US Foods Inc. As to Claim 10008, although the Debtors' Books and Records show and demonstrate an unsecured claim in the amount of $37,480.81 due to Cintas Corporation No. 2, the Books and Records do not support a claim in excess of that amount, and certainly do not support a claim in the amount of $240,589.69, the amount Cintas sets forth in its Proof of Claim No. 10008.

6. I have also determined that as to Claim 53 (the "**Federal Insurance Claim**"), a review of the Books and Records only supports a claim for $35,198.00 owed to Federal Insurance Company c/o/ Chubb. There is no unliquidated amount, and the claim should be reduced to the liquidated amount of $35,198.00.

7. Additionally, Claim 53 is duplicative of Claim 54 filed by Great Northern Insurance Company c/o Chubb (the **Great Northern Claim**"). The Federal Insurance Claim and the Great Northern Claim were both filed on the same day, December 8, 2024. Both the Federal Insurance Claim and the Great Northern Claim assert a claim in the exact same amount ($35,198.00 plus an unliquidated amount). Both the Federal Insurance Claim and the Great Northern Claim set forth the same party to which notice and payment should be sent, *i.e.* Brian

Rawson, with an email address of brian.rawson@chubb.com, and an address of 202A Hall's Mill Road, 2E, Whitehouse Station, NJ 08889. And finally, both the Federal Insurance Claim and the Great Northern Claim annex the same "back up" documentation, to support the claims. It is my belief that the Great Northern Claim (and perhaps the Federal Insurance Claim as well) are made by a reinsurer and are clearly duplicative. Moreover, the Debtors are not aware of any contractual liability that the Debtors owe to Great Northern Insurance Company c/o Chubb. Therefore, only one of these claims should be allowed in the reduced amount of $35,198.00.

8. Accordingly, I believe that:

a. Claim No. 34 should be disallowed and expunged;

b. Claim No. 53 should be reduced from $35,198.00 plus an unliquidated amount, to only $35,198.00, with no other amount, unliquidated or otherwise;

c. Claim No. 54 should be disallowed and expunged; and

d. Claim No. 10008 should be reduced from $240,589 to $37,580.81.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

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Dated: December 19, 2024

/s/ Mark Rimer
Mark Rimer