

**UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re: ) Chapter 11  
)  
SENTINEL MANAGEMENT GROUP, INC., ) Case No. 07 B 14987  
)  
Debtor. ) Hon. John H. Squires

**ORDER GRANTING TRUSTEE'S MOTION TO  
(A) SET BAR DATE FOR FILING PROOFS OF CLAIM  
AND (B) APPROVE THE FORM AND MANNER OF NOTICE THEREOF**

This matter coming before the Court on the Trustee's Motion To (A) Set Final Date for Filing Proofs of Claim and (B) Approve the Form and Manner of Notice Thereof (the "Motion")<sup>1</sup>; the Trustee having given due and proper notice of the Motion; the Court being fully advised in the premises; and the Court having jurisdiction over this core proceeding;

**IT IS HEREBY ORDERED THAT:**

1. With the exception of governmental units (as defined in Section 101(27) of the Bankruptcy Code) and Entities whose claims arise out of rejection of an executory contract or an unexpired lease (under sections 365(g) and 502(g) of the Bankruptcy Code), all persons, creditors, customers, individuals, partnerships, corporations, associations, estates, trusts, and other entities that hold or assert any claim (as the term "claim" is defined in section 101(5) of the Bankruptcy Code) (a "Claim") against the Debtor arising prior to, or which may be deemed to have arisen prior to, the Petition Date, shall file a proof of claim against the Debtor, together with supporting documents, on or before March 14, 2008 (the "General Bar Date").

2. Any Entity whose Claims arise out of the rejection of an executory contract or an unexpired lease under sections 365(g) and 502(g) of the Bankruptcy Code shall file a proof of

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<sup>1</sup> Terms not defined herein shall have the meaning ascribed to them in the Motion.

claim against the Debtor on or before the later of: (a) the date set by the Court in the Order authorizing the rejection of such contract or lease; or (b) the General Bar Date.

3. Governmental units shall have until March 14, 2008 (the "Governmental Bar Date," and together with the General Bar Date, the "Bar Dates") to file proofs of claim for Claims against the Debtor arising prior to, or which may be deemed to have arisen prior to, the Petition Date in this case.

4. If the Schedules are subsequently modified or supplemented, any entity whose Claim is listed in any such modification or supplement shall receive notice of same and have until the later of (a) the General Bar Date or the Governmental Bar Date, as applicable; or (b) thirty (30) days after such modification or supplement is filed to file a proof of claim, which information shall be contained on the notice sent to any entity whose Claim has been so modified or supplemented.

5. Any holder of a Claim against the Debtor arising prior to, or which may be deemed to have arisen prior to, the Petition Date of the Debtor, that fails to file a proof of claim on or before the Bar Dates shall be forever barred, absent further order of the Court: (a) from asserting such a Claim against the Debtor; (b) from voting on any chapter 11 plan proposed in this case; and (c) from sharing in any distribution from the Debtor's estate.

6. Entities (a) whose Claims are listed on the Schedules, (b) whose Claims are not listed on the Schedules as "contingent," "unliquidated," or "disputed," and (c) who do not dispute the listed amount or stated characterization of their Claim on the Schedules need not file a proof of claim prior to the Bar Dates. Any such Claims described in (a) through (c) of this paragraph for which proofs of claim are not filed shall be allowed, if at all, only up to the amount listed in the Schedules.

7. The following persons, creditors, customers, individuals, partnerships, corporations, associations, estates, trusts, governmental units, or other entities may, but need not, file proofs of claim in accordance with the Notice of Bar Date:

- (a) any individual or entity that has already properly filed a proof of claim against the Debtor in accordance with the procedures set forth herein and the Notice of Bar Date;
- (b) any individual or entity (i) that agrees with the nature, classification and amount of a debt set forth in the Schedules and (ii) whose potential Claim against the Debtor is not listed as "disputed," "contingent," or "unliquidated" in the Schedules;
- (c) any individual or entity that has had a Claim against the Debtor previously allowed by an order of the Bankruptcy Court; or
- (d) any individual or entity asserting a claim allowable under section 503(b) and 507(a)(1) as an administrative expense of the Debtor's chapter 11 case.

8. All proofs of claim must be filed with the Bankruptcy Court by submitting a proof of claim on or before the Bar Dates at the following address:

United States Bankruptcy Court for the Northern District of Illinois  
Everett McKinley Dirksen United States Courthouse  
Clerk of the Bankruptcy Court – Room 713  
219 South Dearborn Street  
Chicago, Illinois 60604

9. The Notice of Bar Date in the form attached hereto as Exhibit A is approved.

10. The Trustee shall, within seven business days of the entry of this Order, mail a copy of the Notice of Bar Date, substantially in the form attached as Exhibit A to this Order, to:

(a) the United States Trustee for the Northern District of Illinois; (b) all creditors and customers listed on the Schedules at the addresses stated therein; (c) all entities requesting notice pursuant to Bankruptcy Rule 2002 in these cases; and (d) all persons or entities whose names and

addresses are known to the Trustee and who may hold pre-petition Claims of any kind against the Debtor's estate.

Dated: Chicago, Illinois  
January 7, 2008



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THE HONORABLE JOHN H. SQUIRES  
UNITED STATES BANKRUPTCY JUDGE

**Exhibit A**

**Notice of Bar Date**

**UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re: ) Chapter 11  
 )  
SENTINEL MANAGEMENT GROUP, INC., ) Case No. 07 B 14987  
 )  
Debtor. ) Hon. John H. Squires

**NOTICE OF BAR DATE AND PROCEDURES FOR FILING PROOFS OF CLAIM**

**TO ALL PERSONS ASSERTING A CLAIM AGAINST THE ABOVE DEBTOR:**

On January \_\_\_\_, 2008, the United States Bankruptcy Court for the Northern District of Illinois, Eastern Division (the "Bankruptcy Court"), entered an Order in the above-captioned case (the "Bar Date Order") establishing March 14, 2008 as the general claims bar date (the "General Bar Date") and March 14, 2008 as the governmental units bar date (the "Governmental Bar Date"). Except as described below, the Bar Date Order requires that any Claims (as defined herein) against the Debtor listed above be filed with the Bankruptcy Court, by filing a proof of claim with the Bankruptcy Court at the following address:

United States Bankruptcy Court for the Northern District of Illinois  
Everett McKinley Dirksen United States Courthouse  
Clerk of the Bankruptcy Court – Room 713  
219 South Dearborn Street  
Chicago, Illinois 60604

Proofs of claim must be actually received on or before the General Bar Date or the Governmental Bar Date as applicable. Proofs of claim are deemed filed only when they are actually received by the Bankruptcy Court.

For your convenience, a proof of claim form is enclosed with this Bar Date Notice.

**INDIVIDUALS AND ENTITIES REQUIRED TO FILE A PROOF OF CLAIM  
BY THE GENERAL BAR DATE**

Pursuant to the Bar Date Order, all persons or entities, including, without limitation, individuals, partnerships, corporations, estates, trusts, unions, indenture trustees, (singly, an "Entity") holding Claims against the Debtor (whether secured, customer, priority or unsecured) that arose prior to August 17, 2007 are required to file proofs of claim by the General Bar Date.

**GOVERNMENTAL UNITS BAR DATE**

All governmental units, as defined in 11 U.S.C. § 101(27), holding Claims against the Debtor are required to file proofs of claim by the Governmental Bar Date.

## WHO SHOULD FILE A CLAIM

The following Entities or governmental units must file a proof of claim on or before the General Bar Date or Governmental Bar Date, as applicable:

- a. any Entity or governmental unit whose Claim is listed in the Debtor's Schedules as "disputed," "contingent" or "unliquidated" and who desires to participate in this chapter 11 case or share in any distribution in this chapter 11 case;
- b. any Entity or governmental unit whose Claim is improperly classified in the Schedules or is listed in an incorrect amount and that desires to have its Claim allowed in a classification or amount other than that set forth in the Schedules; or
- c. any Entity or governmental unit asserting a Claim that is not listed in the Schedules.

The following Entities or governmental units are not required to file a proof of claim on or before the General Bar Date or Governmental Bar Date:

- a. any Entity or governmental unit that has already properly filed a proof of claim against the Debtor in accordance with the procedures set forth in this Bar Date Notice;
- b. any Entity or governmental unit (a) that agrees with the nature, classification and amount of such Claim set forth in the Schedules, and (b) whose Claim against the Debtor is not listed as "disputed," "contingent" or "unliquidated" in the Schedules;
- c. any Entity or governmental unit whose Claim against the Debtor previously has been allowed by an order of the Bankruptcy Court; or
- d. any Entity or governmental unit asserting a Claim allowable under sections 503(b) and 507(a)(1) of the Bankruptcy Code as an administrative expense of the Debtor's chapter 11 case.

An Entity or governmental unit should not file a proof of claim if such Entity or governmental unit does not have a Claim against the Debtor. Receipt of this Bar Date Notice by an Entity or governmental unit does not mean that such Entity or governmental unit has a Claim or that the Trustee or the Bankruptcy Court believes such Entity or governmental unit has a Claim. Moreover, neither the Trustee nor its attorneys nor the Bankruptcy Court can advise an Entity or governmental unit whether an Entity or governmental unit should file a proof of claim.

## CLAIMS RELATED TO REJECTION OF EXECUTORY CONTRACTS AND UNEXPIRED LEASES

Any Entity whose Claims arose out of the rejection of an executory contract or an unexpired lease must file a proof of claim on or before the later of: (a) the date set by the Court in the Order authorizing the rejection of such contract or lease; or (b) the General Bar Date (the "Rejection Bar Date").

## CLAIMS RELATED TO AMENDMENTS TO SCHEDULES

If the Debtor's Schedules are amended subsequent to the mailing and publication of this Bar Date Notice to reduce the undisputed, noncontingent and liquidated amount or to change the nature or classification of a Claim against the Debtor reflected therein, then the affected claimant shall have until the later of (a) 30 days after such claimant is served with notice that the Trustee has amended the Debtor's Schedules or (b) the General Bar Date or Governmental Bar Date, as applicable, to file a proof of claim or to amend any previously filed proof of claim (the "Amended Schedule Bar Date").

## CONSEQUENCES OF FAILURE TO FILE A PROOF OF CLAIM

Any Entity or governmental unit that is required to file a proof of claim, but that fails to do so in a timely manner by the General Bar Date or Governmental Bar Date, as applicable, will be forever barred, estopped and enjoined, absent further order of the Court, from:

- a. asserting any Claim against the Debtor that such Entity or governmental unit has that (i) is in an amount that exceeds the amount, if any, that is set forth in the Schedules, or (ii) is of a different nature or in a different classification (in either case, an "Unscheduled Claim"); and
- b. voting upon, or receiving distributions under, any plan or plans of reorganization in this chapter 11 case in respect of an Unscheduled Claim.

If it is unclear from the Schedules whether your Claim is disputed, contingent or unliquidated as to amount or is otherwise properly listed and classified, you must file a proof of claim on or before the General Bar Date or Governmental Bar Date, as applicable. Any Entity or governmental unit that relies on the Schedules bears responsibility for determining that its Claim is accurately listed therein.

## CLAIMS FILED BY FORMER CLIENTS OF THE DEBTOR

Any Entity filing a proof of claim asserting Claims against the Debtor (whether secured, customer, priority or unsecured) that arose prior to August 17, 2007 whose Claims arose out of a client relationship with the Debtor are instructed to attach a copy of the last customer statement received by that Entity from the Debtor as well as such supporting documentation as is necessary to support cash deposits less withdrawals made subsequent to the date of the attached customer statement up until the Petition Date.

## CLAIMS FILED BY COUNTERPARTIES TO REPURCHASE AGREEMENTS OR REVERSE REPURCHASE AGREEMENTS WITH THE DEBTOR

Any Entity filing a proof of claim asserting Claims against the Debtor (whether secured, customer, priority or unsecured) that arose prior to August 17, 2007 whose Claims arose out of being party with the Debtor to a repurchase agreement or reverse repurchase agreement (each such Entity a "Counterparty," and each such agreement a "Repo Agreement") are requested, but not required, to attach the following supporting documentation, including: (a) any documents and/or communications concerning the timing, manner, and amount of any margin calls made by such Counterparty with respect to any property serving as collateral pursuant to a Repo Agreement; (b) any documents and/or communications concerning the timing and manner of any foreclosure initiated by the Counterparty on any such collateral; and (c) any documents and/or communications concerning the timing and manner of, and amount realized pursuant to, any liquidation initiated by the Counterparty of any such collateral,

including but not limited to procedures used at auction, if liquidation occurred by auction, and the identity of the purchaser of such collateral and relation to Counterparty, if any.

#### **DEFINITION OF A CLAIM**

For purposes of this Bar Date Notice, a "Claim" shall mean, as to or against the Debtor: (a) any right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured or unsecured; or (b) any right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured or unsecured.

#### **RESERVATION OF RIGHTS**

The Trustee reserves the right to: (a) dispute, or to assert offsets or defenses against, any filed Claim or any Claim listed or reflected in the Schedules as to nature, amount, liability, classification or otherwise; or (b) subsequently designate any Claim as disputed, contingent or unliquidated. Nothing set forth in this Bar Date Notice shall preclude the Trustee from objecting to any Claim, whether scheduled or filed, on any grounds.

Catherine Steege (ARDC No. 6183529)  
Vincent E. Lazar (ARDC No. 6204916)  
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*Counsel for the Chapter 11 Trustee*

**PROOF OF CLAIM FORM**

UNITED STATES BANKRUPTCY COURT Northern DISTRICT OF Illinois

PROOF OF CLAIM

Name of Debtor: **Sentinel Management Group, Inc.**

Case Number: **07-14987**

NOTE: This form should not be used to make a claim for an administrative expense arising after the commencement of the case. A request for payment of an administrative expense may be filed pursuant to 11 U.S.C. § 503.

Name of Creditor (the person or other entity to whom the debtor owes money or property):

Check this box to indicate that this claim amends a previously filed claim.

Court Claim Number: \_\_\_\_\_  
(If known)

Filed on: \_\_\_\_\_

Name and address where notices should be sent:

Check this box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars.

Check this box if you are the debtor or trustee in this case.

Telephone number:

Name and address where payment should be sent (if different from above):

Telephone number:

1. Amount of Claim as of Date Case Filed: \$ \_\_\_\_\_

If all or part of your claim is secured, complete item 4 below; however, if all of your claim is unsecured, do not complete item 4.

If all or part of your claim is entitled to priority, complete item 5.

Check this box if claim includes interest or other charges in addition to the principal amount of claim. Attach itemized statement of interest or charges.

5. Amount of Claim Entitled to Priority under 11 U.S.C. §507(a). If any portion of your claim falls in one of the following categories, check the box and state the amount.

Specify the priority of the claim.

Domestic support obligations under 11 U.S.C. §507(a)(1)(A) or (a)(1)(B).

Wages, salaries, or commissions (up to \$10,950\*) earned within 180 days before filing of the bankruptcy petition or cessation of the debtor's business, whichever is earlier - 11 U.S.C. §507 (a)(4).

Contributions to an employee benefit plan - 11 U.S.C. §507 (a)(5).

Up to \$2,425\* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use - 11 U.S.C. §507 (a)(7).

Taxes or penalties owed to governmental units - 11 U.S.C. §507 (a)(8).

Other - Specify applicable paragraph of 11 U.S.C. §507 (a)(\_\_\_\_\_).

Amount entitled to priority:

\$ \_\_\_\_\_

\*Amounts are subject to adjustment on 4/1/10 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment.

2. Basis for Claim: \_\_\_\_\_  
(See instruction #2 on reverse side.)

3. Last four digits of any number by which creditor identifies debtor: \_\_\_\_\_

3a. Debtor may have scheduled account as: \_\_\_\_\_  
(See instruction #3a on reverse side.)

4. Secured Claim (See instruction #4 on reverse side.)  
Check the appropriate box if your claim is secured by a lien on property or a right of setoff and provide the requested information.

Nature of property or right of setoff:  Real Estate  Motor Vehicle  Other

Describe: \_\_\_\_\_  
Value of Property: \$ \_\_\_\_\_ Annual Interest Rate: \_\_\_\_\_%

Amount of arrearage and other charges as of time case filed included in secured claim, if any: \$ \_\_\_\_\_ Basis for perfection: \_\_\_\_\_

Amount of Secured Claim: \$ \_\_\_\_\_ Amount Unsecured: \$ \_\_\_\_\_

6. Credits: The amount of all payments on this claim has been credited for the purpose of making this proof of claim.

7. Documents: Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements or running accounts, contracts, judgments, mortgages, and security agreements. You may also attach a summary. Attach redacted copies of documents providing evidence of perfection of a security interest. You may also attach a summary. (See definition of "redacted" on reverse side.)

DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING.

If the documents are not available, please explain:

Date:

Signature: The person filing this claim must sign it. Sign and print name and title, if any, of the creditor or other person authorized to file this claim and state address and telephone number if different from the notice address above. Attach copy of power of attorney, if any.

FOR COURT USE ONLY

**INSTRUCTIONS FOR PROOF OF CLAIM FORM**

The instructions and definitions below are general explanations of the law. In certain circumstances, such as bankruptcy cases not filed voluntarily by the debtor, there may be exceptions to these general rules.

**Court, Name of Debtor, and Case Number:**

Fill in the federal judicial district where the bankruptcy case was filed (for example, Central District of California), the bankruptcy debtor's name, and the bankruptcy case number. If the creditor received a notice of the case from the bankruptcy court, all of this information is located at the top of the notice.

**Creditor's Name and Address:**

Fill in the name of the person or entity asserting a claim and the name and address of the person who should receive notices issued during the bankruptcy case. A separate space is provided for the payment address if it differs from the notice address. The creditor has a continuing obligation to keep the court informed of its current address. See Federal Rule of Bankruptcy Procedure (FRBP) 2002(g).

**Items to be completed in Proof of Claim form**

**1. Amount of Claim as of Date Case Filed:**

State the total amount owed to the creditor on the date of the Bankruptcy filing. Follow the instructions concerning whether to complete items 4 and 5. Check the box if interest or other charges are included in the claim.

**2. Basis for Claim:**

State the type of debt or how it was incurred. Examples include goods sold, money loaned, services performed, personal injury/wrongful death, car loan, mortgage note, and credit card.

**3. Last Four Digits of Any Number by Which Creditor Identifies Debtor:**

State only the last four digits of the debtor's account or other number used by the creditor to identify the debtor.

**3a. Debtor May Have Scheduled Account As:**

Use this space to report a change in the creditor's name, a transferred claim, or any other information that clarifies a difference between this proof of claim and the claim as scheduled by the debtor.

**4. Secured Claim:**

Check the appropriate box and provide the requested information if the claim is fully or partially secured. Skip this section if the claim is entirely unsecured. (See DEFINITIONS, below.) State the type and the value of property that secures the claim, attach copies of lien

documentation, and state annual interest rate and the amount past due on the claim as of the date of the bankruptcy filing.

**5. Amount of Claim Entitled to Priority Under 11 U.S.C. §507(a).**

If any portion of your claim falls in one or more of the listed categories, check the appropriate box(es) and state the amount entitled to priority. (See DEFINITIONS, below.) A claim may be partly priority and partly non-priority. For example, in some of the categories, the law limits the amount entitled to priority.

**6. Credits:**

An authorized signature on this proof of claim serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

**7. Documents:**

Attach to this proof of claim form redacted copies documenting the existence of the debt and of any lien securing the debt. You may also attach a summary. You must also attach copies of documents that evidence perfection of any security interest. You may also attach a summary. FRBP 3001(c) and (d). Do not send original documents, as attachments may be destroyed after scanning.

**Date and Signature:**

The person filing this proof of claim must sign and date it. FRBP 9011. If the claim is filed electronically, FRBP 5005(a)(2), authorizes courts to establish local rules specifying what constitutes a signature. Print the name and title, if any, of the creditor or other person authorized to file this claim. State the filer's address and telephone number if it differs from the address given on the top of the form for purposes of receiving notices. Attach a complete copy of any power of attorney. Criminal penalties apply for making a false statement on a proof of claim.

**DEFINITIONS**

**Debtor**

A debtor is the person, corporation, or other entity that has filed a bankruptcy case.

**Creditor**

A creditor is the person, corporation, or other entity owed a debt by the debtor on the date of the bankruptcy filing.

**Claim**

A claim is the creditor's right to receive payment on a debt that was owed by the debtor on the date of the bankruptcy filing. See 11 U.S.C. §101 (5). A claim may be secured or unsecured.

**Proof of Claim**

A proof of claim is a form used by the creditor to indicate the amount of the debt owed by the debtor on the date of the bankruptcy filing. The creditor must file the form with the clerk of the same bankruptcy court in which the bankruptcy case was filed.

**Secured Claim Under 11 U.S.C. §506(a)**

A secured claim is one backed by a lien on property of the debtor. The claim is secured so long as the creditor has the right to be paid from the property prior to other creditors. The amount of the secured claim cannot exceed the value of the property. Any amount owed to the creditor in excess of the value of the property is an unsecured claim. Examples of liens on property include a mortgage on real estate or a security interest in a car.

A lien may be voluntarily granted by a debtor or may be obtained through a court proceeding. In some states, a court judgment is a lien. A claim also may be secured if the creditor owes the debtor money (has a right to setoff).

**Unsecured Claim**

An unsecured claim is one that does not meet the requirements of a secured claim. A claim may be partly unsecured if the amount of the claim exceeds the value of the property on which the creditor has a lien.

**Claim Entitled to Priority Under 11 U.S.C. §507(a)**

Priority claims are certain categories of unsecured claims that are paid from the available money or property in a bankruptcy case before other unsecured claims.

**Redacted**

A document has been redacted when the person filing it has masked, edited out, or otherwise deleted, certain information. A creditor should redact and use only the last four digits of any social-security, individual's tax-identification, or financial-account number, all but the initials of a minor's name and only the year of any person's date of birth.

**Evidence of Perfection**

Evidence of perfection may include a mortgage, lien, certificate of title, financing statement, or other document showing that the lien has been filed or recorded.

**INFORMATION**

**Acknowledgment of Filing of Claim**

To receive acknowledgment of your filing, you may either enclose a stamped self-addressed envelope and a copy of this proof of claim or you may access the court's PACER system ([www.pacer.psc.uscourts.gov](http://www.pacer.psc.uscourts.gov)) for a small fee to view your filed proof of claim.

**Offers to Purchase a Claim**

Certain entities are in the business of purchasing claims for an amount less than the face value of the claims. One or more of these entities may contact the creditor and offer to purchase the claim. Some of the written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court or the debtor. The creditor has no obligation to sell its claim. However, if the creditor decides to sell its claim, any transfer of such claim is subject to FRBP 3001 (e), any applicable provisions of the Bankruptcy Code (11 U.S.C. § 101 et seq.), and any applicable orders of the bankruptcy court.