UNITED STATES BANKRUPTCY COURT

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SANTA ANA DIVISION

CENTRAL DISTRICT OF CALIFORNIA

In re:

Case No.: 8:14-bk-11492-ES

THE TULVING COMPANY, INC.,

Chapter 7

Debtor

OBJECTION AND REQUEST FOR HEARING TO TRUSTEE'S MOTION FOR ORDER (I) AUTHORIZING THE TURNOVER OF CERTAIN BOOKS. **RECORDS AND FILES OF THE DEBTOR TO** GREATCOLLECTIONS.COM D/B/A **GREAT COLLECTIONS, (II) AUTHORIZING THE DISPOSAL OF** CERTAIN OTHER BOOKS. **RECORDS AND FILES OF THE** DEBTOR, AS THEY BECOME UNNECESSARY, (III) AUTHORIZING PAYMENT OF DISPOSAL COSTS WHEN INCURRED, AND (IV) GRANTING RELATED RELIEF

TO THE HONORABLE ERITHE SMITH, UNITED STATES
BANKRUPTCY JUDGE, AND THE OFFICE OF THE UNITED STATES
TRUSTEE:

PLEASE TAKE NOTICE that the undersigned hereby objects to Trustee's Motion for Order (i) Authorizing the Turnover of Certain Books, Records and Files of the Debtor to Greatcollections.com D/B/A Great Collections, (ii) Authorizing the Disposal of Certain Other Books, Records and Files of the Debtor, as they Become Unnecessary, (iii) Authorizing Payment of Disposal Costs When Incurred, and (iv) Granting Related Relief (the "Motion").

PLEASE TAKE FURTHER NOTICE that the undersigned represents a customer of The Tulving Company, Inc. ("<u>Debtor</u>") during the time period referenced in the Motion.

PLEASE TAKE FURTHER NOTICE that the undersigned intends this filing to be considered as a timely response to the Motion and a request for a hearing under Local Bankruptcy Rules (as defined in the Motion).

WHEREFORE, the undersigned respectfully requests that (i) this Court order a hearing regarding the Motion, and (ii) the undersigned be allowed to participate in such hearing telephonically.

Dated: May 19, 2016

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