

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: : Chapter 7
: :
AMERICAN BUSINESS FINANCIAL : Case No. 05-10203 (MFW)
SERVICES, INC. *et al.*, : (Jointly Administered)
: :
Debtors.¹ : **Hearing Date: December 7, 2011 at 2:00 p.m.**
: :
: **Objection Date: November 30, 2011 at 4:00 p.m.**

**NOTICE OF CHAPTER 7 TRUSTEE'S FIRST OMNIBUS (NON-SUBSTANTIVE)
OBJECTION TO DUPLICATIVE CLAIMS**

TO: [Claim Holders and/or Counsel, if any].

The Chapter 7 Trustee has filed the First Omnibus (Non-Substantive) Objection to Duplicative Claims (the "First Omnibus Objection") [Docket Nos. 5160 and 5161] which seeks to alter your rights by disallowing individual claims of Collateralized Noteholders and Unsecured Noteholders² because they duplicate other claims filed as Master Claims either by (i) Law Debenture Trust Company of New York ("Law Debenture"), (ii) Wells Fargo Bank, National Association ("Wells Fargo"), or (iii) U.S. Bank National Association, in their capacities as Indenture Trustees. The treatment of the Master Claims filed by Law Debenture and Wells Fargo has been agreed to pursuant to a settlement agreement entered into among the Chapter 7 Trustee, Law Debenture and Wells Fargo (the "Settlement Agreement") which was previously approved by the Bankruptcy Court. The contact information for the Indenture Trustees is set forth on the Chapter 7 Trustee's website at WWW.ABFSONLINE.COM.

To identify which of the Master Claims is a duplicate of the individual claim which you filed, you should check the exhibits to the First Omnibus Objection which are posted

¹ American Business Financial Services, Inc, Case No. 05-10203, Tiger Relocation Company, Case No. 05-10204, American Business Credit, Inc., Case No. 05-10206, Home American Credit, Inc., Case No. 05-10207, American Business Mortgage Services, Inc., Case No. 05-10208 and ABFS Consolidated Holdings, Inc., Case No. 05-10217 (collectively, the "Debtors").

² Capitalized terms shall have meanings ascribed to them in the First Omnibus Objection unless otherwise expressly defined herein.

Docket No. 5162
Filed 11/2/2011

on the Trustee's website at WWW.ABFSONLINE.COM and also on the Bankruptcy Court's docket [Docket Entry Nos. 5160 and 5161, dated 11/2/2011].

The reason the Chapter 7 Trustee has filed this First Omnibus Objection to the individual claims of noteholders is that the Chapter 7 Trustee has made, or intends to make distributions on, or on account of, one or more of the three Master Claims (as modified by the Settlement Agreement, as applicable) to the three Indenture Trustees and the Indenture Trustees will in turn make distributions under and subject to the applicable Indenture and/or applicable law. By this First Omnibus Objection the Chapter 7 Trustee does not seek to affect, limit or impair your right to receive distributions, to the extent you are entitled to do so,³ from your Indenture Trustee from any funds received by your Indenture Trustee for such purpose in this bankruptcy case.

Only in the event that you do not agree to your claim being a duplicate of one of the Master Claims being asserted by the Indenture Trustees, are you required to file a written response with the Bankruptcy Court, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801 to the First Omnibus Objection on or before **November 30, 2011 (the "Response Deadline")**⁴. At the same time you file your written response, if any, with the Bankruptcy Court, you must also serve a copy of the response upon the Chapter 7 Trustee's attorney:

**John T. Carroll, III, Esq.
Cozen O'Connor
1201 North Market Street
Suite 1400
Wilmington, DE 19801**

³ To the extent your individual claim also asserts an interest in preferred stock, the First Omnibus Objection seeks to deem the individual claim solely as a proof of interest (and not a proof of claim) of an equity security holder solely for the stock interest under 11 U.S.C. §501(a), and such proofs of interest for preferred stock interest(s) shall not be allowed as a claim of a creditor as defined by §§101(5) and (10). Such proofs of interest by equity security holders for preferred stock would only be entitled to distribution after the claims of all creditors are fully paid.

⁴ Please do **not** disclose your social security number in any responses filed with the Court and served on the Chapter 7 Trustee's attorney.

The Bankruptcy Court will conduct a hearing on the First Omnibus Objection on **December 7, 2011 at 2:00 p.m. (Prevailing Eastern Time)** before the Honorable Mary F. Walrath, U.S.B.J. at the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 5th Floor, Courtroom No. 4, Wilmington, Delaware 19801 (the "Hearing"). You are not required to attend the Hearing on the First Omnibus Objection unless you believe your claim is not a duplicate of the Master Claims. If you wish to participate in the Hearing by telephone, please contact CourtCall at 866-582-6878 (ext. 3) at least 48 hours in advance of the Hearing.

The Bankruptcy Court may grant the relief demanded in the First Omnibus Objection without further notice or hearing if there are no written responses filed in accordance with this Notice.

Dated: Wilmington, Delaware
November 2, 2011

COZEN O'CONNOR

By: /s/ John T. Carroll, III
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