

**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 : **Responses due by: May 1, 2013 at 4:00 p.m.**
: :
: **Hearing Date: May 8, 2013 at 2:00 p.m.**

**NOTICE OF OMNIBUS (NON-SUBSTANTIVE)
OBJECTION TO STOCK OWNERSHIP CLAIMS**

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

The Chapter 7 Trustee has filed the Third Omnibus (Non-Substantive) Objection to Stock Ownership Claims (the "Third Omnibus Objection") [Docket No. 5445] which seeks to alter your rights by reclassifying individual claims of Share Owner Claimants² because they are based on the ownership of stock and should have been filed as proofs of interest (and not as proofs of claim). A copy of the Third Omnibus Objection has been posted on the Chapter 7 Trustee's website at WWW.ABFSONLINE.COM To identify whether your individual claim will be reclassified, you should check the exhibits to the Third Omnibus Objection which are posted along with the Third Omnibus Objection on the Chapter 7 Trustee's website at WWW.ABFSONLINE.COM and also on the Bankruptcy Court's docket [Docket No. 5445; dated 3/27/2013].

The reason the Chapter 7 Trustee has filed this Third Omnibus Objection to the individual Stock Ownership Claims is that the Chapter 7 Trustee believes that the Stock Ownership Claims should have been filed as proofs of interests (and not as proofs of claim). The

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 Third Omnibus Objection unless otherwise expressly defined herein.

individual claims are based on the ownership of preferred or common stock. A claim based on the ownership of shares of stock in a corporation is properly characterized as a proof of interest (and not a proof of claim) held by an equity security holder pursuant to 11 U.S.C. § 501(a). The Trustee asserts based on his review that the Stock Ownership Claims are currently incorrectly classified as proofs of claim by creditors on the official claims register and claims registered with the Chapter 11 claims agent instead of correctly as proofs of interest by equity security holders. Accordingly, through the Third Omnibus Objection, the Chapter 7 Trustee seeks to have the Stock Ownership Claims reclassified correctly as proofs of interest by an equity security holder. By this Third 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, as an equity security holder with a valid proof of interest.

Only in the event that you do not agree to your proof of claim being reclassified as a proof of interest held by an equity security holder, are you required to file a written response with the Bankruptcy Court, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801 to the Third Omnibus Objection on or before **May 1, 2013 at 4:00 p.m. (the “Response Deadline”).**³ 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 counsel:

**John T. Carroll, III, Esq.
Keith L. Kleinman, Esq.
Cozen O’Connor
1201 North Market Street
Suite 1001
Wilmington, DE 19801**

The Bankruptcy Court will conduct a hearing on the Third Omnibus Objection on **May 8, 2013 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 Third Omnibus Objection unless you believe your proof of

³ Please do **not** disclose your social security number in any responses filed with the Bankruptcy Court and served on the Chapter 7 Trustee’s attorney.

claim is not properly reclassified as a proof of interest held by an equity security holder. 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 Third Omnibus Objection without further notice or hearing if there are no written responses filed in accordance with this Notice.

Dated: Wilmington, Delaware
March 26, 2013

COZEN O'CONNOR

/s/ John T. Carroll, III

By:

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