

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

In re:

AMERICAN BUSINESS FINANCIAL
SERVICES, INC., *et al.*,

Debtors.¹

Chapter 7

Case No. 05-10203 (MFW)
(Substantively Consolidated)

Hearing Date: June 21, 2017 at 2:00 p.m.

Objection Date: June 14, 2017 at 4:00 p.m.

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

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

The Chapter 7 Trustee has filed the Trustee's Ninth Omnibus (Non-Substantive) Objection to Claims (the "Ninth Omnibus Objection") [**Docket No. 6413**] which seeks to alter your rights by disallowing individual claims of Collateralized Noteholders and Unsecured Noteholders¹ 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.

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").

¹ Capitalized terms shall have meanings ascribed to them in the Ninth Omnibus Objection unless otherwise expressly defined herein.

To identify which of the Master Claims is a duplicate of the individual claim which you filed, you should check the exhibits to the Ninth Omnibus Objection which are posted on the Trustee's website at WWW.ABFSONLINE.COM and also on the Bankruptcy Court's docket [**Docket Entry No. 6413, dated May 22, 2017**]. The reason the Chapter 7 Trustee has filed this Ninth 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 Ninth 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,² 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 Ninth Omnibus Objection on or before **June 14, 2017 (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:

² To the extent your individual claim also asserts an interest in preferred stock, the Ninth 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.

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.

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

The Bankruptcy Court will conduct a hearing on the Ninth Omnibus Objection on **June 21, 2017 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 Ninth 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 Ninth Omnibus Objection without further notice or hearing if there are no written responses filed in accordance with this Notice.

Dated: May 22, 2017

COZEN O'CONNOR

/s/ Keith L. Kleinman

By: _____

John T. Carroll, III (DE No. 4060)
Keith L. Kleinman (DE No. 5693)
1201 N. Market Street
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*Counsel to Chapter 7 Trustee
George L. Miller*

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

In re:

AMERICAN BUSINESS FINANCIAL
SERVICES, INC., *et al.*,

Debtors.¹

Chapter 7

Case No. 05-10203 (MFW)
(Substantively Consolidated)

Hearing Date: June 21, 2017 at 2:00 p.m.

Objection Date: June 14, 2017 at 4:00 p.m.

**TRUSTEE'S NINTH OMNIBUS OBJECTION (NON-SUBSTANTIVE)
TO CLAIMS**

Claimants receiving this Objection should locate their names and claims in Exhibit "A."

George L. Miller, in his capacity as Chapter 7 Trustee (the "Chapter 7 Trustee") for the substantively consolidated estates of the above captioned debtors (the "Estate" of the "Debtors"), in accordance with the Order Approving Chapter 7 Trustee's Motion to Establish Special Procedures Regarding Objections to Duplicative Claims [Docket No. 4943] (the "Special Claims Procedures Order"), hereby objects (the "Ninth Omnibus Objection") to each of the claims listed on the Duplicative Claims Exhibit which is attached hereto, incorporated herein by reference and marked as Exhibit "A." pursuant to 11 U.S.C. § 502 and Rules 3007 and 9014 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Rule 3007-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court"). In support of this Ninth Omnibus Objection, the Chapter 7 Trustee submits his Declaration (the "Chapter 7 Trustee's Declaration") attached hereto as Exhibit "B" and incorporated herein by reference, and respectfully represents as follows:

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").

JURISDICTION

1. The Bankruptcy Court has jurisdiction over this Ninth Omnibus Objection pursuant to 28 U.S.C. Sections 157 and 1334. The matter is a core proceeding pursuant to 28 U.S.C. Sections 157(b)(2)(A)(B) and (O). Venue is proper before this Bankruptcy Court pursuant to 28 U.S.C. Sections 1408 and 1409. The statutory predicates for the relief sought herein are sections 105, 501, 502 of title 11 of the United States Code (the "Bankruptcy Code"), Bankruptcy Rules 1001 and 3007 and Local Rules 1001-1(c) and 3007-1.

BACKGROUND

2. On either January 21 or 24, 2005 (the "Petition Date"), the Debtors filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code. Pursuant to an order signed on January 25, 2005, the Debtors' cases are jointly administered with those of their affiliated debtors.

3. On May 17, 2005 the Debtors' Chapter 11 cases were converted to cases under Chapter 7 of the Bankruptcy Code (the "Conversion Date") and on the same date the Chapter 7 Trustee was appointed to administer the Debtors' bankruptcy cases in Chapter 7.

4. On or about May 26, 2005 the Bankruptcy Court issued a Notice of Chapter 7 (Conversion) setting a date of June 16, 2005 for a Meeting of Creditors pursuant to §341 and setting the deadline to file a proof of claim of August 18, 2005 [Docket No. 865] by mail to all known creditors (approximately 35,000 parties). Subsequently, on August 16, 2005, the Bankruptcy Court issued a Notice of Corrected Bar Date by mail to all known creditors (the "Bar Date Notice") [Docket No. 1753]. The Bar Date Notice established a deadline of September 16, 2005 (the "Chapter 7 Bar Date") for the filing of proofs of claim for all claims (except government units) that arose prior to the Petition Date.

5. American Business Financial Services, Inc. (“ABFS”) issued certain senior collateralized notes (the “2003 Senior Collateralized Notes”) under an Indenture, dated as of December 31, 2003 (the “2003 Indenture”) by and between ABFS and U.S. Bank National Association (“U.S. Bank”) as the original Indenture Trustee. Subsequently, U.S. Bank withdrew as Indenture Trustee under the 2003 Indenture and Law Debenture Trust Company of New York (“Law Debenture”) was substituted as the successor Indenture Trustee.

6. ABFS issued certain additional senior collateralized notes (the “2004 Senior Collateralized Notes”) under an Indenture, dated as of June 30, 2004 (the “2004 Indenture” and together with the 2003 Indenture, the “Collateralized Indentures”) by and between ABFS and U.S. Bank as the original Indenture Trustee. Subsequently, U.S. Bank also withdrew as Indenture Trustee under the 2004 Indenture and Wells Fargo Bank, National Association (“Wells Fargo”) was substituted as the successor Indenture Trustee (collectively, Law Debenture and Wells Fargo are the “Collateralized Sub-debt Trustees”).

7. Pursuant to Section 6.9 of the Collateralized Indentures, the Collateralized Sub-debt Trustees each filed proofs of claim (the “Collateralized Sub-debt Master Claims”) for the amounts owing under the Indentures respectively to the holders of the 2003 Senior Collateralized Notes and the 2004 Senior Collateralized Notes (collectively, the “Collateralized Noteholders”). The treatment of the Collateralized Sub-debt 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 which was previously approved by order of the Bankruptcy Court [Docket No. 4160].

8. ABFS also issued certain unsecured, subordinated investment notes and unsecured adjustable rate subordinated money market notes (the “Unsecured Notes” and together with the 2003 Senior Collateralized Notes and the 2004 Senior Collateralized Notes, the “Notes”) under certain indentures dated October 19, 1995, May 27, 1997, October 20, 1998, October 15, 1999, October 30, 2000, October 16, 2001, October 3, 2002 and November 7, 2003 (collectively, the “Unsecured Indentures” and together with the Collateralized Indentures, the “Indentures”) by and between ABFS and U.S. Bank as Indenture Trustee (the “Unsecured Indenture Trustee”).

9. Pursuant to the Unsecured Indentures, the Unsecured Indenture Trustee filed a proof of claim on behalf of the holders of Unsecured Notes (collectively, the “Unsecured Noteholders”) asserting a claim as of the Petition Date in the principal amount of \$487,007,319.74 plus interest of \$34,640,948.47 (the “Unsecured Noteholder Master Claim”).

10. In addition to the Collateralized Sub-debt Master Claims filed by the Collateralized Sub-debt Trustees and the Unsecured Noteholder Master Claim filed by the Unsecured Indenture Trustee asserting rights to payment of the Notes issued pursuant to the Indentures (collectively, the “Master Claims”), individual Collateralized Noteholders and Unsecured Noteholders in response to receiving the Bar Date Notice have filed in excess of approximately 20,000 individual proofs of claim which are duplicative of the claims set forth in the Master Claims.

11. The Chapter 7 Trustee has filed two omnibus objections objecting to more than 20,000 individual proofs of claim filed by individual Collateralized Noteholders and Unsecured Noteholders as being duplicative of the claims set forth in the Master Claims [Docket Nos. 5160, 5161 & 5326] and the Bankruptcy Court has entered orders sustaining both of the Chapter 7 Trustee’s omnibus objections to such claims [Docket Nos. 5257 & 5357].

12. Upon further investigations, the Chapter 7 Trustee has determined that an additional 79 individual proofs of claim filed by individual Collateralized Noteholders and/or Unsecured Noteholders (the “Proofs of Claim”) are duplicative of the claims set forth in the Master Claims but were inadvertently omitted from the previous omnibus objections. Accordingly, in accordance with his duties under § 704(a)(5) of the Bankruptcy Code, and in order to enable distribution to be made from the Estate pursuant to § 726 of the Bankruptcy Code, the Chapter 7 Trustee files this Ninth Omnibus Objection objecting to the Proofs of Claim asserting rights to payment of the Notes filed by individual Collateralized Noteholders and/or Unsecured Noteholders because such individual proofs of claim assert claims which are duplicative of the claims asserted in the Master Claims. The distributions to be made from the Estate by the Chapter 7 Trustee on behalf of Collateralized Noteholders and Unsecured Noteholders will be made on the Master Claims to the Collateralized Sub-debt Trustees and the Unsecured Indenture Trustee, who in turn would make distributions to the individual Collateralized Noteholders and Unsecured Noteholders in accordance with the applicable Indentures.

**Special Claims Procedure Order and Relief Requested in
Ninth Omnibus Objection Regarding Duplicative Claims**

13. The Special Claims Procedure Order [Docket No. 4943] previously entered by the Bankruptcy Court granted the Chapter 7 Trustee’s Motion to Establish Special Procedures Regarding Omnibus Objections to Duplicative Claims [Docket No. 4870], approved the use of certain special procedures in connection with the Ninth Omnibus Objection consisting *inter alia* of permitting the Chapter 7 Trustee to provide notice of the Ninth Omnibus Objection by (a) mailing a Notice of Ninth Omnibus Objection in the form annexed hereto as Exhibit “C” (the “Notice of Ninth Omnibus Objection”) to the individual claimants and (b) posting a copy of the

Ninth Omnibus Objection and Notice of Ninth Omnibus Objection (Exhibit “C” hereto) on the website maintained by the Chapter 7 Trustee (collectively, the “Special Procedures”).

14. By this Ninth Omnibus Objection, the Chapter 7 Trustee hereby objects to each of the listed individual Proofs of Claim filed by individual Collateralized Noteholders and individual Unsecured Noteholders asserting rights of payment of the Notes (the “Duplicative Claims”) set forth on the exhibit which is attached hereto, incorporated herein and marked as Exhibit “A” (the “Duplicative Claims Exhibit”) on the non-substantive basis that the claims asserting rights to payment of the Notes are duplicative of the Master Claims filed by one or more of the Indenture Trustees and therefore should be disallowed. To the extent a Duplicative Claim also asserts an interest in preferred stock, the Trustee requests that the Duplicative Claims shall be deemed to be solely a proof of interest (and not a proof of claim) by an equity security holder under 11 U.S.C. § 501(a) solely for the stock interest, and that such Duplicative Claim(s) shall nevertheless be disallowed as a claim of a creditor as defined by 11 U.S.C. §§ 101(5) and (10). Accordingly, the Chapter 7 Trustee, consistent with the Special Procedures established by the Special Claims Procedures Order, requests entry of an order by the Bankruptcy Court in the form attached hereto as Exhibit “D” disallowing the Duplicative Claims pursuant to § 502 of the Bankruptcy Code, Rules 3007 and 9014 of the Federal Rules of Bankruptcy Procedure and Del. Bankr. L.R. 3007-1.

SEPARATE CONTESTED MATTERS

15. Each of the Duplicative Claims and the Chapter 7 Trustee’s objections thereto as asserted herein constitute a separate contested matter, as contemplated by Bankruptcy Rule 9014 and Local Rule 3007-1. The Chapter 7 Trustee requests that any order entered by the Bankruptcy Court with respect to an objection asserted herein be deemed a separate order with respect to each Duplicative Claim.

RESPONSES TO THE OBJECTION

A. Filing and Service of Responses

16. Pursuant to the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and orders of this Bankruptcy Court, in the event you do not agree to your claim being a duplicate of one of the Master Claim(s) being asserted by the Indenture Trustees or otherwise contest the claim objection, a claimant must file a written response to the Ninth Omnibus Objection (a “Response”) with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Wilmington, DE 19801 on or before **June 14, 2017 at 4:00 p.m. (Prevailing Eastern Time) (the “Response Deadline”).**

17. At the same time claimants file a written Response, if any, with the Bankruptcy Court, claimants must also serve a copy of the written Response upon the Chapter 7 Trustee’s counsel:

John T. Carroll, III, Esquire
Keith L. Kleinman, Esquire
Cozen O’Connor
1201 North Market Street, Suite 1400
Wilmington, DE 19801

18. In any Responses filed with the Bankruptcy Court and served on the Chapter 7 Trustee’s counsel, claimants should **not** disclose their social security numbers.

19. If a Response to the Ninth Omnibus Objection is not received by the Response Deadline, the relief requested shall be deemed unopposed, and the Bankruptcy Court may enter an order granting the relief sought without a hearing.

20. If a Response contains an address different from that stated on the Duplicative Claims actually filed, the address in the Response shall control and shall be the service address for other future service of papers.

B. Timely Response Required; Hearing; Replies

21. If a Response is properly and timely filed and served in accordance with the above-procedures, the Chapter 7 Trustee will endeavor to reach a consensual resolution with the claimant. If no consensual resolution is reached, the Bankruptcy Court will conduct a hearing with respect to the Ninth Omnibus Objection and the Response on **June 21, 2017 at 2:00 p.m. (Prevailing Eastern Time)** or other such date and time as the parties filing Responses may be notified. Only those Responses made in writing and timely filed and received will be considered by the Bankruptcy Court at any such hearing. The Chapter 7 Trustee reserves the right to adjourn a hearing with respect to a specific objection set forth herein and any Response thereto.

22. If a claimant whose proof of claim is subject to the Ninth Omnibus Objection fails to file and serve a timely Response on or before the Response Deadline, the Chapter 7 Trustee will present to the Bankruptcy Court an appropriate order disallowing the claim **without further notice to the claimant.**

NOTICE

23. The Chapter 7 Trustee will, in accordance with the Special Claims Procedures Order, provide notice of this Ninth Omnibus Objection by (a) mailing the Notice of Ninth Omnibus Objection to the individual claimants and (b) posting a copy of the Ninth Omnibus Objection and the Notice of Ninth Omnibus Objection on the website maintained by the Chapter 7 Trustee for the Debtors' Estate. Service of the Notice of the Ninth Omnibus Objection (Exhibit "C" hereto) will be made by first-class, U.S. mail, postage prepaid upon each of the claimants identified in the Duplicative Claim Exhibit (Exhibit "A") to the Ninth Omnibus Objection at the addresses listed therein. A copy of this Ninth Omnibus Objection is also being served upon the United States Trustee.

RESERVATION OF RIGHTS

24. In this Ninth Omnibus Objection, the Chapter 7 Trustee has asserted certain objections to the Duplicative Claims. Pursuant to Del. Bankr. L.R. 3007-1, the objections contained herein are non-substantive. By this reservation, the Chapter 7 Trustee expressly reserves the right to amend, modify, or supplement the objections asserted herein and to file additional objections, including without limitation, pursuant to § 502(d) of the Bankruptcy Code, to the Proofs of Claim or any other claims (whether filed or not filed) which may be asserted against the Debtors' Estate. Should this Ninth Omnibus Objection be dismissed or overruled, the Chapter 7 Trustee reserves his right to object on any other grounds that the Chapter 7 Trustee discovers during the pendency of this case.

STATEMENT OF COMPLIANCE WITH LOCAL RULE 3007-1

25. The undersigned representative of Cozen O'Connor ("Cozen") certifies that he has reviewed the requirements of Del. Bankr. L.R. 3007-1 and that the Ninth Omnibus Objection substantially complies with that Local Rule subject to the terms of the Special Claims Procedures Order. To the extent that the Ninth Omnibus Objection does not comply in all respects with the requirements of Del. Bankr. L.R. 3007-1 and the Special Claims Procedures Order, Cozen believes that such deviations are not material and respectfully requests that any such requirement be waived.

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WHEREFORE, the Chapter 7 Trustee respectfully requests that the Bankruptcy Court (i) sustain this Ninth Omnibus Objection, (ii) enter an Order, substantially in the form which is attached hereto as Exhibit “D” disallowing the Duplicative Claims, and (iii) granting such other and further relief as the Bankruptcy Court may deem just and proper.

Dated: May 22, 2017

COZEN O’CONNOR

/s/ Keith L. Kleinman

By: _____

John T. Carroll, III (DE No. 4060)

Keith L. Kleinman (DE No. 5693)

1201 N. Market Street

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Counsel to Chapter 7 Trustee,

George L. Miller

EXHIBIT A
DUPLICATIVE CLAIMS EXHIBIT

American Business Financial Services, Inc. et al.

Case # 05-10203

EXHIBIT A - NINTH OMNIBUS OBJECTION
DUPLICATIVE CLAIMS

1	2	3	4	5
Claimant Name	Remaining Master Claim	Duplicate Claim to be Disallowed	Claim Amount	Reason for Disallowance
Mansfield, Michael 105 Flotsam Rd Manahawkin, NJ 08050	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	298	\$ 3,176.41	Duplicative of Master Claim(s) Identified in Column 2
Mansfield, Michael 105 Flotsam Rd Manahawkin, NJ 08050	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	299	\$ 1,000.00	Duplicative of Master Claim(s) Identified in Column 2
Capista, Craig Ugtma 206 Maple Ave Wyncote, PA 19095	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	1231	\$ 1,661.42	Duplicative of Master Claim(s) Identified in Column 2
Corbett, Gleeola And Masia, Shelia 2930 Driftwood Place X91 Stockton, CA 95219	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	1817	\$ 20,469.16	Duplicative of Master Claim(s) Identified in Column 2
Moscoso, Luis Edgar 18524 SW 294 Ter Homestead, FL 33030- 2441	US Bank Claim #14093	2191	\$ 234.07	Duplicative of Master Claim(s) Identified in Column 2
Moscoso, Luis Edgar 18524 SW 294 Ter Homestead, FL 33030- 2441	US Bank Claim #14093	2192	\$ 274.99	Duplicative of Master Claim(s) Identified in Column 2
Kaplan Rev Liv Tr Jerry Kaplan 2385 Tahitian Lane #19 Clearwater, FL 33763	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	2353	\$ 20,000.00	Duplicative of Master Claim(s) Identified in Column 2
Tweddle, Carol 39 Eighth Street W. Keansburg, NJ 07734	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	2980	\$ 4,000.00	Duplicative of Master Claim(s) Identified in Column 2
Welsh, Dorn K 133 Fairway Dr. Dillsburg, PA 17019- 1542	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	3351	\$ 83.52	Duplicative of Master Claim(s) Identified in Column 2

Schmitz, Kay G 560 NW 43rd Ave Conconut Creek, FL 33066	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	3972	\$ 41.13	Duplicative of Master Claim(s) Identified in Column 2
Coulter, Patricia A 4816 West 140th Street Hawthorne, CA 90250- 6517	US Bank Claim #14093	3982	\$ 4,915.42	Duplicative of Master Claim(s) Identified in Column 2
Levine, Adam 5000 Collett Ave Encino, CA 91436	US Bank Claim #14093, Law Debenture Claim #26564, Wells Fargo Claim #19730	5199	\$ 489,288.64	Duplicative of Master Claim(s) Identified in Column 2
Shirley Pullman Trust Northern Trust Bank of FL 3100 North Military Trail Boca Raton, FL 33431- 6323	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	5384	\$ 10,000.00	Duplicative of Master Claim(s) Identified in Column 2
Cloud, Katelin Beth Ugtma 709 N. Belview Ave Springfield, MO 65802- 2246	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	6360	\$ 1,619.54	Duplicative of Master Claim(s) Identified in Column 2
Allison W Keyes Tr Uda 8/30/93 10300 Village Circle Drive, Apt 1411 Palos Park, IL 60464- 3350	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	6932	\$ 3,600.00	Duplicative of Master Claim(s) Identified in Column 2
Amaranthus, Brianna 1032 Starlite Place Grant's Pass, OR 97526- 1165	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	7177	\$ 3,445.67	Duplicative of Master Claim(s) Identified in Column 2
Zaremba, Olivia Ugtma 18 Duncan Pl Nutley, NJ 07110-3312	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	7543	\$ 2,638.34	Duplicative of Master Claim(s) Identified in Column 2
Corbett, Gleola and Masia, Sheila 2930 Driftwood Pl, Apt X91 Stockon, CA 95219- 8024	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	7682	\$ 20,008.88	Duplicative of Master Claim(s) Identified in Column 2
Byrnes, Thomas J 105 Dover Road Colonia, NJ 07067-3916	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	8214	\$ 2,200.00	Duplicative of Master Claim(s) Identified in Column 2

Tweddle, Carol And Raymond 39 8th Street Keansburg, NJ 07734	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	10389	\$ 4,000.00	Duplicative of Master Claim(s) Identified in Column 2
Gift Shop Jewelers Inc 215 E Hutchinson San Marcos, TX 78666	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	11016	\$ 2,500.00	Duplicative of Master Claim(s) Identified in Column 2
Estate of Zora H McNeece Richard Stein (Administrator) 162 First Oak Drive Mabank, TX 75156	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	12518	\$ 2,270.96	Duplicative of Master Claim(s) Identified in Column 2
Quattrochi, Bonnie A 4 Eisenhower Dr Mlavern, PA 19355- 2906	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	12908	\$ 1,147.67	Duplicative of Master Claim(s) Identified in Column 2
Miller, Audrey 3503 Woodvalley Dr. Pikesville, MD	US Bank Claim #14093	13553	\$ 4,047.00	Duplicative of Master Claim(s) Identified in Column 2
Lindenfeld, Sara 1490 Hornell Loop, Apt 2H Brooklyn, NY 11239- 2509	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	15037	\$ 1,593.39	Duplicative of Master Claim(s) Identified in Column 2
Altmann, Erika Schnackenburg Str .6 12159 Berlin, Germany	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	15992	\$ 5,777.03	Duplicative of Master Claim(s) Identified in Column 2
Labouff, Connie 117 Woodland Ave Medford, NJ 08055	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	16497	\$ 1,473.02	Duplicative of Master Claim(s) Identified in Column 2
Schecter, Jonathan 41 Fifth Ave New York, NY 10003	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	16907	\$ 35,000.00	Duplicative of Master Claim(s) Identified in Column 2
Roehl, Jeffry L 20663 Ulysses St NW Elk River, MN 55330- 8729	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	17130	\$ 2,343.38	Duplicative of Master Claim(s) Identified in Column 2
Cowherd, Larry 2621 East 26th Street Joplin, MO 64804-3106	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	18630	\$ 7,435.41	Duplicative of Master Claim(s) Identified in Column 2

Dugan, Meghan 18 Hampton Ct Queensbury, NY 12804	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	18963	\$ 2,225.00	Duplicative of Master Claim(s) Identified in Column 2
Gilstrop, Ethel S 32 N 62nd St Philadelphia, PA 19139- 2210	US Bank Claim #14093	19156	\$ 3,000.00	Duplicative of Master Claim(s) Identified in Column 2
Cunard, Stefanie Ugtma 2252 Lawton Trl MO Valley, IA 51555- 8002	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	19571	\$ 12,500.00	Duplicative of Master Claim(s) Identified in Column 2
MIT S LLP 5891 Hulmeville Road Bensalem, PA 19020- 2447	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	20003	\$ 10,495.82	Duplicative of Master Claim(s) Identified in Column 2
Martel, Rosemary 1125 W Charlene Lane Schaumburg, IL 60193- 1325	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	20580	\$ 5,192.45	Duplicative of Master Claim(s) Identified in Column 2
Hartman, Kevin J 4146 Rabbit Run Dr Brooklyn, OH 44144	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	20600	\$ 3,000.00	Duplicative of Master Claim(s) Identified in Column 2
Hartman, Kevin J 4146 Rabbit Run Dr Brooklyn, OH 44144	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	20603	\$ 2,000.00	Duplicative of Master Claim(s) Identified in Column 2
Rowland, Dermot F 933 Wildwood Lane Naples, FL 34105-3253	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	20668	\$ 28,996.43	Duplicative of Master Claim(s) Identified in Column 2
Holtz Jr., Robert F 1294 Ironwood Pl Broomfield, CO 80020- 1248	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	20677	\$ 73.18	Duplicative of Master Claim(s) Identified in Column 2
Henry, Leroy D 1621 Randolph Ave Pulaski, VA 24301	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	20770	\$ 137.77	Duplicative of Master Claim(s) Identified in Column 2
Holben, Lyndsey 2815 Woodview Dr Beavercreek, OH 45431	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	20969	\$ 1,000.00	Duplicative of Master Claim(s) Identified in Column 2
Puderbach, Janet M 27 Jasmine Lane Sicklerville, NJ 08081- 4107	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	21138	\$ 1,150.00	Duplicative of Master Claim(s) Identified in Column 2

Mucci, Alicia R UGTMA 1331 Verga Ave Verga, NJ 08093-1733	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	21872	\$ 1,000.00	Duplicative of Master Claim(s) Identified in Column 2
Jensen Family Trust 11106 W Palmeras Dr Sun City, AZ 85373- 1826	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	21883	\$ 5,000.00	Duplicative of Master Claim(s) Identified in Column 2
SPCP Group, LLC C/O Maura I Russell, Esq. Traub, Bonacquist & Fox LLP 655 Third Avenue, 21st floor New York, NY 10017	US Bank Claim #14093 or Wells Fargo Claim #19730	21929	\$ 3,123.13	Duplicative of Master Claim(s) Identified in Column 2
O'Neill, Trevor O Ugtma 28 N Central Ave, 2nd floor Rockledge, PA 19046- 4212	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	22283	\$ 2,348.89	Duplicative of Master Claim(s) Identified in Column 2
Kozikowski, Josephine 36 Lawson Drive Madison, CT 06443- 3135	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	23298	\$ 4,206.14	Duplicative of Master Claim(s) Identified in Column 2
Cole, Kristina R Ugtma Carol A. Cole Custodian 5583 Berrybrook Cir Pace, FL 32571-6320	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	23350	\$ 6,500.00	Duplicative of Master Claim(s) Identified in Column 2
Pierson, John T 281 Bay Ave Milford, DE 19963- 4909	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	23416	\$ 2,071.83	Duplicative of Master Claim(s) Identified in Column 2
Sanfilippo, Donna Ugtma 84-56 258th Street Floral Park, NY 11001	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	23500	\$ 10,925.00	Duplicative of Master Claim(s) Identified in Column 2
Pachtman, Elaine Gelb 511 Lombard St Philadelphia, PA 19147- 1414	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	23553	\$ 7,883.59	Duplicative of Master Claim(s) Identified in Column 2
New England Hebrew Academy 9 Prescott St Brookline, MA 02446- 4020	US Bank Claim #14093	23671	\$ 1,850.00	Duplicative of Master Claim(s) Identified in Column 2

New England Hebrew Academy Yeshiva Gedola Attn: Chaim Ciment 9 Prescott Street, Box 514 Brookline, MA 02446	US Bank Claim #14093	23675	\$ 88,946.55	Duplicative of Master Claim(s) Identified in Column 2
Spcp Group, Llc As Agent For Silver Point Capital C/O Maura I Russell, Esq. Traub, Bonacquist & Fox LLP 655 Third Avenue, 21st floor New York, NY 10017	US Bank Claim #14093 or Wells Fargo Claim #19730	23808	\$ 32,872.71	Duplicative of Master Claim(s) Identified in Column 2
Schmitt, Eva A 5495 Orange Blvd. Sanford, FL 32771	US Bank Claim #14093	23884	\$ 6,845.14	Duplicative of Master Claim(s) Identified in Column 2
Schmitt, Eva A 5495 Orange Blvd. Sanford, FL 32771	US Bank Claim #14093	23885	\$ 2,200.00	Duplicative of Master Claim(s) Identified in Column 2
Schmitt, Eva A 5495 Orange Blvd. Sanford, FL 32771	US Bank Claim #14093	23886	\$ 2,010.90	Duplicative of Master Claim(s) Identified in Column 2
Schmitt, Eva A 5495 Orange Blvd. Sanford, FL 32771	US Bank Claim #14093	23891	\$ 4,900.00	Duplicative of Master Claim(s) Identified in Column 2
Knowles, Bryan C 62 Oak Street Harwich, MA 02645	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	24412	\$ 1,416.90	Duplicative of Master Claim(s) Identified in Column 2
Stith, Gladys W 3341 Santa Monica Dr Orlando, FL 32822-5895	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	24479	\$ 2,820.00	Duplicative of Master Claim(s) Identified in Column 2
Estate Of Richard Leonard Lawrence 3724 E. Lizard Rock Place Tucson, AZ 85718	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	24628	\$ 5,567.32	Duplicative of Master Claim(s) Identified in Column 2
Cianci, Lisa 1208 Swedesford Road North Wales, PA 19454-3613	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	24945	\$ 3,000.00	Duplicative of Master Claim(s) Identified in Column 2

Wagner, Leonard 1121 Country Place Drive Houston, TX 77079- 4740	US Bank Claim #14093	25009	\$ 143,906.45	Duplicative of Master Claim(s) Identified in Column 2
Hurtado, Richard Jr. 643 Erma Ave Stockton, CA 95207- 2024	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	25075	\$ 586.00	Duplicative of Master Claim(s) Identified in Column 2
SPCP Group LLC C/O Maura I Russell, Esq. Traub, Bonacquist & Fox LLP 655 Third Avenue, 21st floor New York, NY 10017	Wells Fargo Claim #19730	25460	\$ 12,093.56	Duplicative of Master Claim(s) Identified in Column 2
Tufts, Herbert 2740 Asbury Ave Bensalem, PA 19020- 3720	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	25612	\$ 1,000.00	Duplicative of Master Claim(s) Identified in Column 2
Friedman, Charles 309 E. 49th St #1C New York, NY 10017	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	25721	\$ 4,497.19	Duplicative of Master Claim(s) Identified in Column 2
Goodman, Shelly Z. 7857 Spring Ave Elkins Park, PA 19027	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	26237	\$ 6,678.73	Duplicative of Master Claim(s) Identified in Column 2
Hallbom, Jeanette 8312 E Pueblo Ave Mesa, AZ 85208-4604	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	26353	\$ 1,453.94	Duplicative of Master Claim(s) Identified in Column 2
Ventline, Lawrence M 25959 Waterway Druve Harriston Twp, MI 48045	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	26663	\$ 3,000.00	Duplicative of Master Claim(s) Identified in Column 2
Adams, Leland Kenneth 19902 Thacker Drive Boonsboro, MD 21713	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	26696	\$ 4,000.00	Duplicative of Master Claim(s) Identified in Column 2
ARUFFO, PHILIP 369 Barbados Drive Williamstown, NJ 08094	Law Debenture Claim #26564	26720	\$ 25,294.67	Duplicative of Master Claim(s) Identified in Column 2
Viera, John 391 Faith Terrace Sebastian, FL 32958	US Bank Claim #14093	26721	\$ 20,270.54	Duplicative of Master Claim(s) Identified in Column 2

MANDALAYWALA, NAVINIT 440 Liberty Ave Jersey City, NJ 07307	US Bank Claim #14093	26722	\$ 2,096.03	Duplicative of Master Claim(s) Identified in Column 2
Otani, Ryuichi 6-10 Osue-cho Hikone, Shiga 522-0001 Japan	US Bank Claim #14093	26723.2	\$ 5,500.00	Duplicative of Master Claim(s) Identified in Column 2
POWLOVICH, MARILYN 15 Tanglewood Road Paxton, MA 01612-1301	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	26726	\$ 3,000.00	Duplicative of Master Claim(s) Identified in Column 2
Hull, Armond 5950 SW 20th Ave Apt. 1 Gainesville, FL	US Bank Claim #14093, Law Debenture Claim #26564, or Wells Fargo Claim #19730	26727	\$ 10,570.24	Duplicative of Master Claim(s) Identified in Column 2
Squibb, Ronald C 7505 White Hawk Drive Anchorage, AK 99507	US Bank Claim #14093	26728	\$ 10,494.10	Duplicative of Master Claim(s) Identified in Column 2
Gupta, Sanjay Kumar 8 Cranford Road Plainview, NY 11803- 4004	US Bank Claim #14093	26729	\$ 1,174.73	Duplicative of Master Claim(s) Identified in Column 2
Sovik, Paul 18 Breton Hill Road Apt. 2A Baltimore, MD 21208	US Bank Claim #14093	26730	\$ 70,368.77	Duplicative of Master Claim(s) Identified in Column 2

EXHIBIT B
CHAPTER 7 TRUSTEE
DECLARATION

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

In re:

AMERICAN BUSINESS FINANCIAL
SERVICES, INC., *et al.*,

Debtors.¹

Chapter 7

Case No. 05-10203 (MFW)
(Substantively Consolidated)

**DECLARATION OF GEORGE L. MILLER, CHAPTER 7 TRUSTEE,
IN SUPPORT OF THE NINTH OMNIBUS OBJECTION (NON-SUBSTANTIVE)
TO CLAIMS**

I, George L. Miller, the Chapter 7 Trustee for the substantively consolidated estates of the above-captioned Debtors (the “Estate” of the “Debtors”) hereby declare that the following is true to the best of my knowledge, information and belief:

1. On or about May 17, 2005, the Chapter 11 cases of the Debtors were converted to Chapter 7 cases under the Bankruptcy Code² and on the same day I was appointed as Chapter 7 Trustee to administer the Debtors’ Estate.

2. I submit this declaration in support of the Trustee’s Ninth Omnibus Objection (Non-Substantive) to Claims (the “Ninth Omnibus Objection”).

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 Unless otherwise defined herein, all capitalized terms shall have the meanings set forth in the Ninth Omnibus Objection.

3. I make this Declaration on the basis of my review of the Debtors' books and records, the official register of claims together with the claims registered with the claims agent appointed during the Chapter 11 case (collectively the "Claims Register"), information provided by Miller Coffey Tate LLP ("Chapter 7 Trustee's Accountants"), the docket, and the Proofs of Claim (the "Claims") filed in this case.

4. By the Ninth Omnibus Objection, and after review of the Debtors' books and records and upon consultation with the Chapter 7 Trustee's Accountants, I object in my capacity as Chapter 7 Trustee to each of the Duplicative Claims identified on Exhibit "A" of the Ninth Omnibus Objection as claims being duplicative of the Master Claims filed by the Indenture Trustees. To the extent a Duplicative Claim also asserts an interest in preferred stock, I request by the Ninth Omnibus Objection that the Duplicative Claim be deemed to be solely a proof of interest (and not a proof of claim) by an equity security holder under 11 U.S.C. § 501(a) solely for the stock interest, and that such Duplicative Claim(s) shall nevertheless be disallowed as a claim of a creditor as defined by 11 U.S.C. §§ 101(5) and (10).

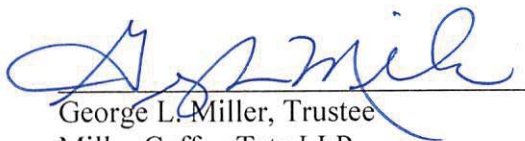
Conclusion

5. Based upon my review and the Chapter 7 Trustee's Accountants' review of the Duplicative Claims, the Claims Register and certain books and records of the Debtors, I believe that granting the relief requested in the Ninth Omnibus Objection is appropriate, correct and also in the best interests of the Debtors' Estate and creditors.

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I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: May 22, 2017



George L. Miller, Trustee
Miller Coffey Tate LLP
8 Penn Center, Suite 950
1628 JFK Boulevard
Philadelphia, PA 19103
Telephone: (215) 561-0950
Chapter 7 Trustee for the Bankruptcy Estates of Debtors

EXHIBIT C

**NOTICE OF NINTH OMNIBUS CLAIM
OBJECTION**

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

In re:

AMERICAN BUSINESS FINANCIAL
SERVICES, INC., *et al.*,

Debtors.⁶

Chapter 7

Case No. 05-10203 (MFW)
(Substantively Consolidated)

Hearing Date: June 21, 2017 at 2:00 p.m.

Objection Date: June 14, 2017 at 4:00 p.m.

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

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

The Chapter 7 Trustee has filed the Trustee's Ninth Omnibus (Non-Substantive) Objection to Claims (the "Ninth Omnibus Objection") [**Docket No.** _____] which seeks to alter your rights by disallowing individual claims of Collateralized Noteholders and Unsecured Noteholders¹ 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.

⁶ 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").

¹ Capitalized terms shall have meanings ascribed to them in the Ninth Omnibus Objection unless otherwise expressly defined herein.

To identify which of the Master Claims is a duplicate of the individual claim which you filed, you should check the exhibits to the Ninth Omnibus Objection which are posted on the Trustee's website at WWW.ABFSONLINE.COM and also on the Bankruptcy Court's docket [**Docket Entry No. _____, dated May 22, 2017**]. The reason the Chapter 7 Trustee has filed this Ninth 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 Ninth 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,² 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 Ninth Omnibus Objection on or before **June 14, 2017 (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:

² To the extent your individual claim also asserts an interest in preferred stock, the Ninth 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.

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.

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

The Bankruptcy Court will conduct a hearing on the Ninth Omnibus Objection on **June 21, 2017 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 Ninth 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 Ninth Omnibus Objection without further notice or hearing if there are no written responses filed in accordance with this Notice.

Dated: May 22, 2017

COZEN O'CONNOR

By:

John T. Carroll, III (DE No. 4060)
Keith L. Kleinman (DE No. 5693)
1201 N. Market Street
Suite 1001
Wilmington, DE 19801
302-295-2000 Telephone
302-295-2013 Fax
jcarroll@cozen.com
kkleinman@cozen.com

*Counsel to Chapter 7 Trustee
George L. Miller*

EXHIBIT D
PROPOSED FORM OF ORDER

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

In re:

AMERICAN BUSINESS FINANCIAL
SERVICES, INC., *et al.*,

Debtors.¹

Chapter 7

Case No. 05-10203 (MFW)
(Substantively Consolidated)

Related D.I. No. _____

ORDER SUSTAINING TRUSTEE'S NINTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) TO CLAIMS

Upon the Ninth Omnibus Objection (Non-Substantive) to Claims pursuant to § 502 of title 11 of the United States Code (the "Bankruptcy Code"), Rules 3007 and 9014 of the Federal Rules of Bankruptcy Procedure and Del. Bankr. L.R. 3007-1 (the "Ninth Omnibus Objection"),² filed by George L. Miller, the Chapter 7 Trustee (the "Chapter 7 Trustee") for the substantively consolidated estates of the above referenced Debtors (the "Estate"); and the Declaration of the Chapter 7 Trustee, attached as Exhibit "B" to the Ninth Omnibus Objection (the "Chapter 7 Trustee's Declaration"); and it appearing that good and sufficient notice of the Ninth Omnibus Objection has been given and that no further notice of the Ninth Omnibus Objection or entry of this order need be provided; and upon the entire record herein; and the Bankruptcy Court having considered the Ninth Omnibus Objection, the Chapter 7 Trustee's Declaration and the Duplicative Claims; and after due deliberation and good and sufficient cause appearing therefore;

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 Unless expressly defined herein, capitalized terms shall have the meanings ascribed to them in the Ninth Omnibus Objection.

IT IS HEREBY FOUND THAT

- A. Capitalized terms not otherwise defined in this Order shall have meanings ascribed to such terms in the Ninth Omnibus Objection;
- B. Each holder of a Duplicative Claim listed on Exhibit “A” of the Ninth Omnibus Objection (the “Claimants”) was provided proper and adequate notice of the Ninth Omnibus Objection pursuant to the Special Claims Procedures Order;
- C. The Ninth Omnibus Objection is a core proceeding under 28 U.S.C. § 157(b)(2);
- D. Any entity known to have an interest in the Duplicative Claims has been afforded reasonable opportunity to respond or to be heard regarding the relief requested in the Ninth Omnibus Objection;
- E. Each of the Duplicative Claims listed on Exhibit “A” of the Ninth Omnibus Objection are claims which are duplicative of Master Claims filed either by the Collateralized Sub-debt Trustees and/or the Unsecured Indenture Trustee;
- F. The relief requested in the Ninth Omnibus Objection is in the best interest of the Debtors’ Estate, creditors, and other parties in interest; and it is therefore

ORDERED, ADJUDGED AND DECREED THAT

1. The Ninth Omnibus Objection is **GRANTED**.
2. Pursuant to Sections 105(a) and 502(b) of the Bankruptcy Code, each of the Duplicative Claims identified on Exhibit “A” of the Ninth Omnibus Objection are disallowed with respect to any asserted right of payment under the Notes as duplicative of the Master Claims.

3. To the extent a Duplicative Claim asserts an interest in preferred stock, the Duplicative Claim is deemed to be solely a proof of interest (and not a proof of claim) by an equity security holder under 11 U.S.C. §501(a) solely for the stock interest, and that such Duplicative Claim(s) are disallowed as a claim of a creditor as defined by 11 U.S.C. §§101(5) and (10).

4. The Bankruptcy Court shall retain jurisdiction over the Debtors and the Claimants whose claims are subject to the Ninth Omnibus Objection with respect to any matters related to or arising from the implementation of this Order.

5. Each Duplicative Proof of Claim and the objection by the Chapter 7 Trustee constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate Order with respect to each claim. Any stay of this Order pending appeal by any of the Claimants whose claims are subject to the contested matter which involves such Claimants shall not act to stay the applicability and/or finality of this Order with respect to other contested matters covered hereby.

6. This Order is without prejudice to the Chapter 7 Trustee's right to amend, modify, or supplement the Ninth Omnibus Objection, or to file additional non-substantive or substantive objections.

[remainder of page left intentionally blank]

7. This Order does not affect any claims, rights or remedies the Chapter 7 Trustee has or may have against the Claimants in respect of any amounts owed to the Debtors' Estate by any Claimant under Chapter 5 of the Bankruptcy Code, including without limitation the right to seek disallowance of any Claim pursuant to § 502(d) of the Bankruptcy Code.

Dated: This _____ day of _____, 2017.

BY THE COURT:

Honorable Mary F. Walrath
United States Bankruptcy Court Judge