

IN THE 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.*, : (Substantively Consolidated)
: :
Debtors.¹ : Objection Date: January 7, 2016 at 4:00 p.m.
: :
: Hearing Date: January 20, 2016 at 2:00 p.m.

**NOTICE OF MOTION OF CHAPTER 7 TRUSTEE FOR AUTHORITY TO MAKE
INTERIM DISTRIBUTION TO HOLDERS OF CERTAIN CHAPTER 11
ADMINISTRATIVE EXPENSE CLAIMS, PRIORITY CLAIMS AND GENERAL
UNSECURED CLAIMS**

PLEASE TAKE NOTICE that on December 16, 2015 the Chapter 7 Trustee, George L. Miller (the "Trustee") filed the Motion of Chapter 7 Trustee for Authority to Make Interim Distribution to Holders of Certain Chapter 11 Administrative Expense Claims, Priority Claims and General Unsecured Claims (the "Motion") with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801 (the "Bankruptcy Court").

PLEASE TAKE FURTHER NOTICE that a complete copy of the Motion has been filed of record with the Bankruptcy Court and is available for review and download through the Case Management/Electronic Case File System (CM/ECF) located on the Bankruptcy Court's website at www.deb.uscourts.gov (a PACER account is required), and is also available at the Trustee's websites for these Bankruptcy Cases: <http://www.mctllp.com/trustee.html> and <http://abfsonline.com>. The Trustee in the Motion seeks authority to currently make an interim distribution up to an aggregate amount of \$27,750,180.21 to the creditors holding Resolved Claims identified in Exhibits "A", "B" and "C" of the Motion. The Trustee also seeks in the Motion to later pay to certain creditors holding Remaining Claims (as defined in the Motion) up

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").

to an aggregate amount of \$7,494,412.11 upon the Trustee resolving any disputes or objections to such claims without need for further Court order.

PLEASE TAKE FURTHER NOTICE that any objections to the Motion must be made in writing, filed with the Bankruptcy Court and served so as to actually be received by **4:00 p.m. Eastern Time on January 7, 2016** by the undersigned. If no objections are timely filed in accordance with the above procedures, the undersigned shall file a Certification of No Objection. Upon the filing of the Certification of No Objection, the Court may enter the Order approving the Motion without further notice or a hearing.

PLEASE TAKE FURTHER NOTICE that if an objection is properly filed in accordance with the above procedures, a hearing on the Motion will be held on **January 20, 2016 at 2:00 p.m. Eastern Time** before the Honorable Mary F. Walrath, United States Bankruptcy Court Judge, United States Bankruptcy Court, 824 N. Market Street, 5th Floor, Courtroom No. 4, Wilmington, DE. Only those objections made in writing, timely filed, and served in accordance with the above procedures will be considered at the hearing.

Dated: December 16, 2015
Wilmington, DE

COZEN O'CONNOR

By: /s/ John T. Carroll, III
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*Attorneys for George L. Miller,
Chapter 7 Trustee*

**IN THE 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.*, : (Substantively Consolidated)
: :
Debtors.¹ : **Objection Date: January 7, 2016 at 4:00 p.m.**
: :
: **Hearing Date: January 20, 2016 at 2:00 p.m.**

**MOTION OF CHAPTER 7 TRUSTEE FOR AUTHORITY TO MAKE INTERIM
DISTRIBUTIONS TO HOLDERS OF CERTAIN CHAPTER 11 ADMINISTRATIVE
EXPENSE CLAIMS, PRIORITY CLAIMS AND GENERAL UNSECURED CLAIMS**

George L. Miller, the Chapter 7 Trustee (the "Trustee") for the substantively consolidated estates of American Business Financial Services, Inc., Tiger Relocation Company, American Business Credit, Inc., Home American Credit, Inc., American Business Mortgage Services, Inc., and ABFS Consolidated Holdings, Inc. (collectively, the "Estate"), hereby respectfully files this motion (the "Motion") pursuant to sections 105 and 704 of title 11 of the United States Code (the "Bankruptcy Code") and Rules 2002 and 3009 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") for an order authorizing the Trustee to make an interim distribution (the "Proposed Interim Distribution") to holders of certain Chapter 11 administrative expense claims, priority claims, and general unsecured claims. In support of the Motion, the Trustee respectfully states the following:

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 AND VENUE

1. This Court has jurisdiction over the subject matter of the Motion pursuant to 28 U.S.C. §§ 157 and 1334, and venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. The Trustee has standing to request the relief stated in the Motion. The statutory predicates for the relief sought herein are sections 105 and 704 of the Bankruptcy Code and Bankruptcy Rules 2002 and 3009.

BACKGROUND

2. On either of January 21 or January 24, 2005, the Debtors filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Delaware (the "Court").

3. The Debtors' bankruptcy cases (the "Bankruptcy Cases") are jointly administered under Case No. 05-10203. On March 17, 2015, the Court entered an order substantively consolidating the Debtors' estates.

4. On or about May 17, 2005, the Court entered an order converting the Bankruptcy Cases from cases under Chapter 11 to cases under Chapter 7 of the Bankruptcy Code.

5. On May 17, 2005, the Office of the United States Trustee appointed George L. Miller to serve as the Trustee, and he continues to serve in such capacity.

6. The claims bar date established in the Bankruptcy Cases was September 16, 2005.

7. The Trustee has recovered in excess of \$300 million during his administration of the Bankruptcy Cases, including the liquidation of assets and the settlements achieved by the Trustee in his actions against various third parties.

8. The Trustee is currently holding approximately \$45 million in cash in the Estate, after previously distributing in excess of \$250 million to the Debtors' creditors and in providing for the costs of administering the Bankruptcy Cases.

RELIEF REQUESTED AND BASIS THEREFOR

9. As more fully identified below, the Trustee seeks authority through this Motion to make the Proposed Interim Distribution to holders of certain Chapter 11 administrative expense claims, priority claims, and general unsecured claims.

A. Chapter 11 Administrative Expense Claim Distribution – 100%

10. The aggregate amount of unpaid Chapter 11 administrative expense claims which the Trustee has currently determined should be paid based on his review of such claims (the "Resolved Chapter 11 Administrative Expense Claims") is approximately \$663,483.10 and such Resolved Chapter 11 Administrative Expense Claims are identified on Exhibit "A" hereto. The Trustee reserves his right to remove claims from the list of Resolved Chapter 11 Administrative Expense Claims on Exhibit "A" prior to the entry of an order granting the relief sought in this Motion.

11. The Trustee and his professionals will continue to review, negotiate and if necessary file formal objections to estimated remaining unpaid and asserted Chapter 11 administrative expense claims which are not listed among the Resolved Chapter 11

Administrative Expense Claims identified on Exhibit "A" (the "Remaining Chapter 11 Administrative Expense Claims"), and some of the Remaining Chapter 11 Administrative Expense Claims ultimately may be allowed in full or in part. The Trustee will reserve the full amount of the Remaining Chapter 11 Administrative Expense Claims of \$1,685,053.41 so that the holders of Remaining Chapter 11 Administrative Expense Claims which are later resolved also receive a distribution of 100% of the ultimately allowed claim amount.

12. The Trustee by this Motion seeks authority to pay a Proposed Interim Distribution of 100% to the holders of the Resolved Chapter 11 Administrative Expense Claims identified on Exhibit "A", and also to later pay, without need for further Court order, the same Proposed Interim Distribution of 100% on account of Remaining Chapter 11 Administrative Expense upon the Trustee resolving any disputes or objections to such claims.

B. Priority Claim Distribution – 100%

13. The aggregate amount of the unpaid priority claims which the Trustee has currently determined should be paid based on his review of such claims (the "Resolved Priority Claims") is approximately \$3,111,798.00 and such Resolved Priority Claims are identified on Exhibit "B" hereto. The Trustee reserves his right to remove claims from the list of Resolved Priority Claims on Exhibit "B" prior to the entry of an order granting the relief sought in this Motion.

14. The Trustee and his professionals will continue to review, negotiate and if necessary file formal objections to the estimated remaining unpaid and asserted priority claims which are not listed among the Resolved Priority Claims identified on Exhibit "B" (the

“Remaining Priority Claims”), and some of the Remaining Priority Claims ultimately may be allowed in full or in part. The Trustee will reserve the full amount of the Remaining Priority Claims of \$4,653,464.10 so that the holders of Remaining Priority Claims which are later resolved also receive a distribution of 100% of the ultimately allowed claim amount.

15. The Trustee by this Motion seeks authority to pay a Proposed Interim Distribution of 100% to the holders of the Resolved Priority Claims identified on Exhibit “B” and also to later pay, without need for further Court order, the same Proposed Interim Distribution of 100% on account of Remaining Priority Claims upon the Trustee resolving any disputes or objections to such claims.

C. General Unsecured Claim Distribution – 4.00%

16. The aggregate amount of general unsecured claims which the Trustee has currently determined should be paid based on his review of such claims (the “Resolved GUC” and together with the Resolved Chapter 11 Administrative Expense Claims and the Resolved Priority Claims, the “Resolved Claims”) totals approximately \$599,372,477.83 and such claims are identified on Exhibit “C” hereto. The Trustee reserves his right to remove claims from the list of Resolved GUC on Exhibit “C” prior to the entry of an order granting the relief sought in this Motion.

17. The Trustee and his professionals will continue to review, negotiate and if necessary file formal objections to the estimated remaining unpaid and asserted general unsecured claims which are not listed among the Resolved GUC identified on Exhibit “C” (the “Remaining GUC”); and together with the Remaining Chapter 11 Administrative Expense Claims

and the Remaining Priority Claims, the "Remaining Claims"), and some of the Remaining GUC ultimately may be allowed in full or in part. The Trustee will reserve the amount of 4.00% of the Remaining GUC of \$28,897,365.09 so that the holders of Remaining GUC which are later resolved also receive a distribution of 4.00% of the ultimately allowed claim amount.

18. The Trustee by this Motion seeks authority to pay a Proposed Interim Distribution of 4.00% to the holders of the Resolved GUC and also to later pay, without need for further Court order, the same Proposed Interim Distribution of 4.00% on account of Remaining GUC upon the Trustee resolving any disputes or objections to such claims.

D. Establishment of Reserves

19. In calculating the Proposed Interim Distribution he is in a position to make, the Trustee has, in the exercise of his business judgment, accounted for the need to establish cash reserves of approximately \$10 million for certain purposes, including but not limited to the costs associated with the continued administration of the Bankruptcy Cases and other contingencies, such as administrative tax obligations and estimated and unliquidated claims.

20. As discussed above, the Trustee is reserving sufficient funds to ensure that holders of the Remaining Claims will receive the applicable Proposed Interim Distribution percentage to the extent their Remaining Claims are ultimately resolved. For the avoidance of doubt, in this Motion the Trustee is requesting authority to make, without need for further Court order, the same Proposed Interim Distribution to holders of the Remaining Claims, to the extent such Remaining Claims are ultimately allowed.

E. Summary of Proposed Interim Distribution

21. The following is a summary of the Proposed Interim Distribution:

Claim Category	Aggregate Claim Amount	Reserve Amount	Percentage Distribution	Dollar Distribution	Timing of Distribution
Resolved Chapter 11 Administrative Expense Claims	\$663,483.10	N/A	100%	\$663,483.10	Upon the entry of an order approving this Motion
Remaining Chapter 11 Administrative Expense Claims	\$1,685,053.41	\$1,685,053.41	100% of ultimately resolved amount	None at this time	Upon resolution of the objection or dispute as to each claim
Resolved Priority Claims	\$3,111,798.00	N/A	100%	\$3,111,798.00	Upon the entry of an order approving this Motion
Remaining Priority Claims	\$4,653,464.10	\$4,653,464.10	100% of ultimately resolved amount	None at this time	Upon resolution of the objection or dispute as to each claim
Resolved GUC	\$599,372,477.83	N/A	4.00%	\$23,974,899.11	Upon the entry of an order approving this Motion
Remaining GUC	\$28,897,365.09	\$1,155,894.60	4.00% of ultimately resolved amount	None at this time	Upon resolution of the objection or dispute as to each claim

22. Making the Proposed Interim Distribution will not prejudice any creditor or party-in-interest for the reasons stated herein, including the Trustee's reserve of sufficient funds so that holders of Remaining Claims which are later allowed will receive the same Proposed Interim Distribution as the holders of Resolved Claims of the same priority, as well as reserves for Chapter 7 administrative expenses, estimated and unliquidated claims, and any unknown claims. Further, the Proposed Interim Distribution is consistent with Rule 3009 of the Bankruptcy Rules, which provides that "[i]n a chapter 7 case, dividends to creditors shall be paid as promptly as practicable", as well as section 704 of the Bankruptcy Code, which imposes on the Trustee a duty to close the "estate as expeditiously as is compatible with the best interests of parties in interest." 11 U.S.C. § 704(a)(1).

23. This Court also has the authority to grant the relief requested in this Motion pursuant to section 105 of the Bankruptcy Code. Section 105(a) provides that "[t]he court may issue any order...that is necessary or appropriate to carry out the provisions of this title." 11 U.S.C. § 105(a). The requested relief will enable the Trustee's administration of the Estate in a prudent and expeditious manner, as section 704 requires.

NOTICE

24. A complete copy of this Motion is being served upon: (i) counsel to the Debtors; (ii) the United States Trustee; (iii) counsel to Greenwich Capital Financial Products Inc.; (iv) counsel to Wells Fargo Bank N.A.; (v) counsel to Law Debenture Trust Company of New York; (vi) the Internal Revenue Service; (vii) the Debtors' twenty largest unsecured creditors, and (viii) all other parties in interest having requested notice pursuant to Rule 2002 of the Bankruptcy Rules as of the date hereof. Notice of the Motion, in the form attached as Exhibit "D" hereto

(the "Notice"), will be served on all creditors with allowed claims and posted on the Trustee's websites for the Bankruptcy Cases, <http://www.mctllp.com/trustee.html> and <http://abfsonline.com>. The Notice states that the complete Motion, including Exhibits, is filed of record with this Court and available for review and download through the Case Management/Electronic Case File System (CM/ECF) located on the Bankruptcy Court's website at www.deb.uscourts.gov (a PACER account is required), and will also be made available on the Trustee's websites for the Bankruptcy Cases, <http://www.mctllp.com/trustee.html> and <http://abfsonline.com>. In light of the nature of the relief requested herein, the Trustee respectfully submits that no other or further notice need be given.

WHEREFORE, the Trustee respectfully requests that the Court enter an order granting this Motion and authorizing the Trustee to make the Proposed Interim Distribution as outlined herein including, without limitation, to holders of the Remaining Claims to the extent such Remaining Claims are ultimately allowed, without need for further order by the Court authorizing such a distribution.

Dated: December 16, 2015
Wilmington, DE

COZEN O'CONNOR

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*Attorneys for George L. Miller,
Chapter 7 Trustee*

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	:	Chapter 7
	:	
AMERICAN BUSINESS FINANCIAL	:	Case No. 05-10203 (MFW)
SERVICES, INC. <i>et al.</i> ,	:	(Substantively Consolidated)
	:	
Debtors. ¹	:	Related Doc. No.
	:	
	:	

**ORDER APPROVING MOTION OF CHAPTER 7 TRUSTEE FOR AUTHORITY TO
MAKE INTERIM DISTRIBUTION TO HOLDERS OF CERTAIN CHAPTER 11
ADMINISTRATIVE EXPENSE CLAIMS, PRIORITY CLAIMS AND
GENERAL UNSECURED CLAIMS**

Upon consideration of the Motion of Chapter 7 Trustee for Authority to Make Interim Distribution to Holders of Certain Chapter 11 Administrative Expense Claims, Priority Claims and General Unsecured Claims (the "Motion")²; and notice thereof as described in the Motion being adequate and appropriate under the circumstances; and the relief requested in the Motion appearing to be in the best interest of the Estate; and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Motion is granted; and it is further

ORDERED that the Trustee is authorized to make the Proposed Interim Distribution as set forth in the Motion to the holders of Resolved Claims; and it is further

ORDERED that the Trustee is also authorized to make the Proposed Interim Distribution as set forth in the Motion to the holders of Remaining Claims upon the Trustee resolving any

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 not otherwise defined herein shall have the meanings given in the Motion.

disputes or objections to any such claims without need for further order of this Court; and it is further

ORDERED that this Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

BY THE COURT:

DATED: _____, 2016

Honorable Mary F. Walrath
United States Bankruptcy Court Judge

Exhibit A

Resolved Chapter 11 Administrative Expense Claims

American Business Financial Services, Inc. et al.

Exhibit A - Resolved Chapter 11 Administrative Expense Claims

Creditor	Claim #/Court Order [D.I.]	Resolved Administrative Expense Claim Amount	Proposed Distribution Amount	Proposed Distribution Percentage
Alliance Consulting	21497	\$ 17,104.03	\$ 17,104.03	100.00%
Alvarez & Marsal LLC	18878	\$ 124,292.49	\$ 124,292.49	100.00%
Aungst, Richard E	8180	\$ 4,120.00	\$ 4,120.00	100.00%
Corporate Staffing Services	6358	\$ 16,692.00	\$ 16,692.00	100.00%
Hecker Colasurdo And Segall PC	20387	\$ 35,607.01	\$ 35,607.01	100.00%
Hughes Watters Askanase LLP	13598	\$ 160.00	\$ 160.00	100.00%
JP Morgan Chase Bank, NA	D.I. 1217	\$ 326,004.81	\$ 326,004.81	100.00%
Kforce, Inc.	22946	\$ 7,547.86	\$ 7,547.86	100.00%
Office Of The US Trustee District Of Delaware	18189	\$ 20,000.00	\$ 20,000.00	100.00%
Pitney Bowes Credit Corporation	21041	\$ 5,363.96	\$ 5,363.96	100.00%
Pitney Bowes Credit Corporation	2655	\$ 4,086.41	\$ 4,086.41	100.00%
Pitney Bowes Credit Corporation	3348	\$ 2,293.12	\$ 2,293.12	100.00%
Pitney Bowes Credit Corporation	3940	\$ 310.02	\$ 310.02	100.00%
Pitney Bowes Credit Corporation	743	\$ 257.07	\$ 257.07	100.00%
Sun Microsystems, Inc.	23241	\$ 31,500.32	\$ 31,500.32	100.00%
Sungard Availability Services LP	1470	\$ 68,144.00	\$ 68,144.00	100.00%
Totals		\$ 663,483.10	\$ 663,483.10	

Exhibit B

Resolved Priority Claims

American Business Financial Services, Inc. et al.
 Exhibit B - Resolved Priority Claims

Creditor	Claim #	Resolved Priority Claim Amount	Priority Code Section	Proposed Distribution Amount	Proposed Distribution Percentage
Borough Of West Mifflin	22975	\$ 1,283.82	507(a)(8)	\$ 1,283.82	100.00%
City Of Chicago, A Municipal Corp.	4351	\$ 2,800.00	507(a)(8)	\$ 2,800.00	100.00%
Cleveland, Dirk J	16499	\$ 349.00	507(a)(3)	\$ 349.00	100.00%
Delaware Secretary Of State	26311	\$ 114,234.86	507(a)(8)	\$ 114,234.86	100.00%
Department Of The Treasury	26414-2	\$ 2,979,471.74	507(a)(8)	\$ 2,979,471.74	100.00%
Pennsylvania Dept Of Revenue	26314-2	\$ 6,272.05	507(a)(8)	\$ 6,272.05	100.00%
State Of New Jersey	3730	\$ 6,074.03	507(a)(8)	\$ 6,074.03	100.00%
Swirsding, William E	20468	\$ 1,312.50	507(a)(3)	\$ 1,312.50	100.00%
Totals		\$ 3,111,798.00		\$ 3,111,798.00	

Exhibit C

Resolved GUC Amount

American Business Financial Services, Inc. et al.
Exhibit C - Resolved GUC Amount

Creditor	Claim #/Court Order [D.I.]	Resolved GUC Amount	Proposed Distribution Amount	Proposed Distribution Percentage
Axiom Corporation	14826	\$ 175,977.57	\$ 7,039.10	4.00%
Administrative Agent Of At&T	12534	\$ 411,121.55	\$ 16,444.86	4.00%
Advantage Human Resourcing	12951	\$ 4,072.50	\$ 162.90	4.00%
Alliance Consulting	21497	\$ 145,927.22	\$ 5,837.09	4.00%
Allied Office Products Inc.	20628	\$ 141,357.34	\$ 5,654.29	4.00%
Alta Communications, Inc.	25509	\$ 127,578.00	\$ 5,103.12	4.00%
America's Lending Partners	8857	\$ 77,229.63	\$ 3,089.19	4.00%
Aprisma Management Technologies Inc	12045	\$ 5,350.00	\$ 214.00	4.00%
Atlantic Envelope	17554	\$ 131,687.83	\$ 5,267.51	4.00%
Avaya, Inc.	25190	\$ 75,600.17	\$ 3,024.01	4.00%
Black Box Network Services	24311	\$ 119,388.35	\$ 4,775.53	4.00%
Broughman, William A PC	21450	\$ 107,576.85	\$ 4,303.07	4.00%
Bucks County Recorder Of Deeds	10769	\$ 726.00	\$ 29.04	4.00%
CDW Computer Centers Inc	5935	\$ 162,748.15	\$ 6,509.93	4.00%
Chesapeake Information Services Inc	3461	\$ 105,000.00	\$ 4,200.00	4.00%
Computer Image Systems Inc	4070	\$ 165,872.38	\$ 6,634.90	4.00%
Concerto Software, Inc.	6684	\$ 479,315.95	\$ 19,172.64	4.00%
CPS-Card Personalization Solutions	17546	\$ 102,684.65	\$ 4,107.39	4.00%
Credit Based Asset Servicing & Securization	20464	\$ 6,866,116.78	\$ 274,644.67	4.00%
CSC/Corporation Service Company	4671	\$ 27,514.44	\$ 1,100.58	4.00%
Daimlerchrysler Services North America, Llc	4226	\$ 73,936.89	\$ 2,957.48	4.00%
Doyle And Friedmeyer Pc	23900	\$ 129,292.49	\$ 5,171.70	4.00%
Duane Morris LLP	19815	\$ 351,222.80	\$ 14,048.91	4.00%
Efs-Express Financial Services Inc	11635	\$ 88,658.50	\$ 3,546.34	4.00%
Ems Executive Mailing Services	14354	\$ 477,153.53	\$ 19,086.14	4.00%
Equifax Credit Information Services	22177	\$ 339,755.61	\$ 13,590.22	4.00%
Experian	3614	\$ 455,936.46	\$ 18,237.46	4.00%
Fein Such Kahn & Shepard PC	3514	\$ 88,494.61	\$ 3,539.78	4.00%
Guerra, Rene Realtispec	21599	\$ 175,676.00	\$ 7,027.04	4.00%
H2L2 Architects/Planners, Llp	5094	\$ 156,562.78	\$ 6,262.51	4.00%
Hughes Watters Askanase LLP	13598	\$ 84,969.56	\$ 3,398.78	4.00%
Hutchens, H Terry Pa	18565	\$ 168,670.21	\$ 6,746.81	4.00%
Impax Marketing Group	14433	\$ 94,665.68	\$ 3,786.63	4.00%
Independence Press Inc	10613	\$ 214,763.05	\$ 8,590.52	4.00%
Independence Press, Inc.	26570	\$ 89,027.94	\$ 3,561.12	4.00%
Independence Web	10610	\$ 84,611.90	\$ 3,384.48	4.00%
Innovative Print And Media Group Inc	23459	\$ 175,019.67	\$ 7,000.79	4.00%
Law Debenture Trust Company of New York and Wells Fargo Bank, as Indenture Trustees	D.I. 4160	\$ 58,149,685.00	\$ 2,325,987.40	4.00%
Lewis, Nancy	4538	\$ 220,844.97	\$ 8,833.80	4.00%
Lockheed Martin Corporation	4030	\$ 131,173.25	\$ 5,246.93	4.00%
Mcgraw-Hill Inc DbA Standard & Poors	2784	\$ 285,000.00	\$ 11,400.00	4.00%
On Time Mailing	5328	\$ 444,778.85	\$ 17,791.15	4.00%
One Presidential Boulevard Associates	23019	\$ 259,817.19	\$ 10,392.69	4.00%
Pidc Local Development Corp	4280	\$ 1,800,000.00	\$ 72,000.00	4.00%
Pitney Bowes Credit Corporation	2657	\$ 15,373.30	\$ 614.93	4.00%
Pro-Teck Services, Ltd	7643	\$ 4,690.00	\$ 187.60	4.00%
Purcell Krug And Haller	25590	\$ 169,962.19	\$ 6,798.49	4.00%
R R Donnelley & Sons Company	19529	\$ 573,032.17	\$ 22,921.29	4.00%
Recall Secured Destruction Services	7920	\$ 847.65	\$ 33.91	4.00%
Rekaren Incorporated	475	\$ 477,350.00	\$ 19,094.00	4.00%
Remx Financial A Division Of Remedy	2	\$ 106,723.82	\$ 4,268.95	4.00%
REO WI LLC	196	\$ 2,599.84	\$ 103.99	4.00%
Robert A Tremain And Associates Pc	14276	\$ 91,130.59	\$ 3,645.22	4.00%
Shapiro & Fishman	3207	\$ 180,629.60	\$ 7,225.18	4.00%
SN Funding Trust	19830	\$ 420,000.00	\$ 16,800.00	4.00%
SN Funding Trust	19826	\$ 199,686.10	\$ 7,987.44	4.00%
SN Funding Trust	19823	\$ 195,000.00	\$ 7,800.00	4.00%
SN Funding Trust	19827	\$ 149,366.56	\$ 5,974.66	4.00%
SN Funding Trust	19831	\$ 108,079.21	\$ 4,323.17	4.00%
Softmart	26358	\$ 27,113.83	\$ 1,084.55	4.00%
Spherion Corporation	7839	\$ 101,847.00	\$ 4,073.88	4.00%

American Business Financial Services, Inc. et al.
 Exhibit C - Resolved GUC Amount

Creditor	Claim #/Court Order [D.I.]	Resolved GUC Amount	Proposed Distribution Amount	Proposed Distribution Percentage
Sun Microsystems, Inc.	23241	\$ 134,628.64	\$ 5,385.15	4.00%
Trilogy Leasing Co LLC	20386	\$ 117,744.24	\$ 4,709.77	4.00%
Trivista Plastics, Llc	4285	\$ 143,569.46	\$ 5,742.78	4.00%
US Bank National Association	14093	\$ 521,648,268.21	\$ 20,865,930.73	4.00%
Wallace, Moore	19530	\$ 290,840.56	\$ 11,633.62	4.00%
Wells Fargo Financial Leasing, Inc.	20109	\$ 162,787.56	\$ 6,511.50	4.00%
Wescoco Llc	933	\$ 78,645.00	\$ 3,145.80	4.00%
Totals		\$ 599,372,477.83	\$ 23,974,899.11	4.00%

Exhibit D

Notice of Motion