

TRUSTEE'S RESPONSES TO OBJECTIONS

Objection Doc. #	Party Filing Objection	Related Member Name(s)	Member #	Year(s) of Membership	Summary	Trustee's Respose to Objection
240	Steve Heath/Lil Heath LLC	Lil Heath, LLC	57645	2012	The objection asserts that Lil Heath, LLC cancelled within 3 days of the effective date and that there never was any work done by the entity, exposure, or premium paid.	The Trustee objects to the objection. Timbermen's records reflect that Lil Heath, LLC was a member of Timbermen between January 30, 2012 and March 28, 2012 with premiums and fees paid reflecting such membership. As a result, Lil Heath, LLC is a Class Member.
241	Joe Smetak & Smetak Farms, Inc.	Joe Smetak, Jr.	56255	2005-2015	The objection asserts that Joe Smetak and Smetak Farms, Inc. should only make 1 payment of \$10,064.34 rather than each being responsible for separate payments of \$10,064.34. The objection alleges that Joe Smetak and Smetak Farms, Inc. are one and the same in the adversary proceeding with Joe, Jr. individually not an investor, obligor or otherwise invested in Timbermen.	The Trustee agrees to treat Joe Smetak, Jr. and/or Smetak Farms, Inc. as one Class Member rather than two Class Members, resulting in only one payment from Joe Smetak, Jr. and/or Smetak Farms, Inc. rather than two payments for two separate members.
241		Smetak Farms, Inc.	56255	2005-2015		
242	All Services Storage & Transport, LLC, Datakeepers, LLC, All Services US, LLC	All Services Storage & Transport, LLC	57848	2013-2015	This is a duplicate of Doc. #243 with the addition of a cover letter.	To the extent this document is considered an objection, the Trustee objects to this objection as a duplicate of the objection filed as Doc. # 243.
242		DATAKEEPERS, L.L.C.	57848	2013-2015		
242		All Services US, LLC	57848	2013-2015		
243	All Services Storage & Transport, LLC, Datakeepers, LLC, All Services US, LLC	All Services Storage & Transport, LLC	57848	2013-2015	The objection asserts that DATAKEEPERS, L.L.C. & All Services US, LLC are disregarded entities and inactive companies with no assets or liabilities and no transactions. The objection asserts that DATAKEEPERS, L.L.C. & All Services US, LLC never had any payroll exposure.	The Trustee agrees for DATAKEEPERS, L.L.C. and All Services US, LLC to be removed as Class Members.
243		DATAKEEPERS, L.L.C.	57848	2013-2015		
243		All Services US, LLC	57848	2013-2015		

EXHIBIT A

Objection Doc. #	Party Filing Objection	Related Member Name(s)	Member #	Year(s) of Membership	Summary	Trustee's Respose to Objection
244	Lyle Jay Ivy & Jane Peterson I	Jane Ivy dba Ivy's Urania General Store	57325	2010-2015	The objection asserts that the member sold its business to Ivy's LLC effective January 1, 2012 and should only be liable for years 2010-2011.	The Trustee agrees for the years of membership of Jane Ivy dba Ivy's Urania General Store to be amended to 2010 and 2011.
245	Harper Truck Line, Inc. and Littleton Truck Line, Inc.	HARPER TRUCK LINE, INC.	56869	2008-2015	The objection asserts that Harper Truck Line, Inc. paid all employees and that all payroll was reported by Harper Truck Line, Inc.	The Trustee agrees for Littleton Truck Lines, Inc. to be removed as a Class Member.
245		Littleton Truck Lines, Inc	56869	2008-2015		
246	Mike's Hardware and Supply, L.L.C.	Mike's Hardware and Supply, L.L.C.	57497	2012-2015	The objection asserts that Mike's Hardware and Supply, L.L.C. never signed an indemnity agreement or members' agreement or any other agreement that would make it liable. The objection further asserts that Mike's Hardware and Supply, L.L.C purchased assets from Rob and Lee Corporation but did not assume any of Rob and Lee Corp's debts/liabilities. The objection further asserts that the insurance agent requested a name change on the policy.	The Trustee objects to this objection and asserts that Mike's Hardware and Supply, L.L.C. remains statutorily liable pursuant to La. R.S. Section 23:1196(F) (1995) for the years it was a fund member, 2012 through 2015, under the terms of the Proposed Settlement Agreement, whether or not it signed a contract providing for solidary liability. On behalf of Mike's Hardware and Supply, L.L.C., Lee M. LaFleur, member & manager of Mike's Hardware and Supply, L.L.C., signed an ERM-14 Form resulting in the change in the membership/coverage under the policy/account from ROB AND LEE CORPORATION dba Rob & Lee Inc. & dba Mike's Hardware to Mike's Hardware and Supply, L.L.C.