

**Creditor Leonard Jackson's Motion for Entry of Order Determining Proof of Claim
Timely Filed (the "Jackson Motion")**

By the Jackson Motion, Leonard Jackson ("Jackson") seeks entry of an order determining that Jackson's proof of claim (the "Jackson Claim") is timely filed notwithstanding the fact that the Jackson Claim was filed approximately five months after the deadline established for filing proofs of claim (the "Bar Date").

Jackson alleges that (i) on December 26, 2006 he purchased a house from the Debtors in Parkland, Florida for \$1,112,999, (ii) after the Bar Date and during an inspection commissioned by Jackson, it was proven that his home contains tainted drywall imported from China ("Chinese Drywall") and he has claims for property damage and it is unknown whether he has claims for personal injuries, (iii) the Debtors knew that other homeowners in the community had complained about issues regarding Chinese Drywall, (iv) the Debtors knew that Chinese Drywall had been installed in Jackson's home and that it was corroding copper and other metal surfaces therein, (v) Jackson notified the Debtors of certain air conditioning and electrical problems prior to the Bar Date but had no reason to know such issues were related to the presence of Chinese Drywall until after the Bar Date, and (vi) subsequent to the Bar Date, the Debtors acknowledged that it utilized Chinese Drywall in Jackson's home.

As a result of the foregoing allegations, Jackson asserts that (i) he was not aware of the existence of the Drywall Claims prior to the Bar Date and acted expeditiously to have the Jackson Claims deemed timely filed, (ii) the Debtors were generally aware of the assertion of the Chinese Drywall claims prior to the Bar Date and aware of Jackson's air conditioning and electrical problems prior to the Bar Date, and (iii) allowing Jackson to file the Jackson Claims would not prejudice other creditors.