

SUMMARY OF CLAIM ESTIMATES				
	Claim Estimates		Estimate of	Claim Estimates
	Excluding		Postpetition	Including
	Postpetition	+	Interest	=
	Interest and Fees		and Fees ^(a)	Postpetition
				Interest and Fees
Senior Claims ^(b)	\$2,144,387,154.18		\$55,930,411.42	\$2,200,317,565.60
Subordinated Notes Claims ^(c)	49,631,188.00		1,712,931.83	51,344,119.83
Other Unsecured Claims ^(d)	27,998,022.00		191,784.33	28,189,806.33
Total Secured and Unsecured Claim Estimates	\$2,222,016,364.18		\$57,835,127.58	\$2,279,851,491.77

- (a) Postpetition interest and fee amounts are calculated based on an assumed emergence date of May 31, 2010.
- (b) Senior Claims exclude \$2.9mm outstanding but undrawn letters of credit since they are cash collateralized at 105% per the Cash Collateral Order.
- (c) Postpetition interest is calculated based on prepetition rates of 8% and 1.875% applicable to the two tranches of Subordinated Notes Claims. It should be noted, however, that the 8% Subordinated Notes Indenture provides as follows: “between January 1, 2010 and January 10, 2010, the Company Bank and the Trustee Bank shall agree on the annual interest rate which would be required as of January 1, 2010 in order to make all such Securities trade at par value as of January 1, 2010, excluding accrued but unpaid interest thereon....”
- (d) Estimates of other Unsecured Claims are as of May 3, 2010. Postpetition interest is calculated based on the prime rate as of December 20, 2009 for the TWDC Working Capital Settlement and the yield of 12- month treasuries as of December 20, 2009 for other trade and accrued claim estimates.

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⁴ As explained in my Original Declaration, I, together with the Debtors’ management and other A&M personnel, prepared the liquidation analysis attached as **Exhibit G** to the Disclosure Statement. The liquidation analysis, which was prepared in connection with the filing of the original versions of the plan and disclosure statement on February 3, 2010, included certain estimates of Secured and Unsecured Claims.