

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

| | | |
|-------------------------|---|-----------------------|
| In re: |) | |
| |) | |
| CAJ SOUTHWAY PLAZA LLC, |) | |
| |) | |
| Debtor |) | Chapter 11 |
| |) | Case No. 18-12631-JNF |

**OBJECTION OF THE UNITED STATES TRUSTEE
TO DISCLOSURE STATEMENT**

Pursuant to 28 U.S.C. 586(a)(3)(B), 11 U.S.C. 1125 and Fed. R. Bankr. P. 3017, the United States Trustee ("UST") states that the proposed disclosure statement ("Disclosure Statement") dated October 5, 2018 and submitted by by CAJ Southway Plaza LLC ("Debtor") and several named proponents (cumulatively "Proponents") fails to provide adequate and meaningful information concerning the proposed plan of reorganization of even date ("Plan") (*D.E. # s 48 and 49*). In support, the UST says the caption to the Disclosure Statement and Plan should be amended to indicate a joint Disclosure Statement and Plan between the Debtor and each identified Proponent. Each Proponent should sign the Disclosure Statement and Plan. The Disclosure Statement should include financial information that demonstrates the ability of the Reorganized Debtor/Proponents to make the payments due on the Effective Date and over time, to identify each party to the solar contract with AED, and attach a copy of such contract.

WHEREFORE, the UST respectfully requests that the Court deny the Disclosure Statement and Plan as presently drafted.

WILLIAM K. HARRINGTON
United States Trustee

By: /s/ Paula R. C. Bachtell
Paula R. C. Bachtell BBO #564155

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Dated: November 6, 2018.

**CERTIFICATE OF CONFERENCE
AS REQUIRED BY LOCAL RULE 3017-1**

The UST hereby certifies, in accordance with Local Rule 3017-1(b), that the undersigned attempted to confer with David Madoff on October 24, 2018 and November 6, 2018 regarding the foregoing Objection in a good faith effort to narrow the areas of disagreement.

CERTIFICATE OF SERVICE

The undersigned certifies that on November 6, 2018, true and correct copies of the foregoing Objection were served via the U.S. Bankruptcy Court's CM/ECF filing system or by United States mail, First Class postage pre-paid to those persons listed below.

/s/ Paula R. C. Bachtell
Paula R. C. Bachtell

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