

**IN THE CHANCERY COURT FOR LEWIS COUNTY  
AT HOHENWALD, TENNESSEE**

**IN RE:**

**SENTINEL TRUST COMPANY**

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**NO. 4781**

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**ACTING COMMISSIONER-IN-POSSESSION'S AND SENTINEL TRUST RECEIVER'S  
REPLY TO OBJECTION BY JOHN MELE REGARDING MOTION SEEKING  
APPROVAL OF THE SCHEDULE OF CLAIM DETERMINATIONS**

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On February 14, 2006, John Mele filed an Objection to the Commissioner-in-Possession's and Receiver's January 31, 2006 Motion Seeking Approval of the Schedule of Claim Determinations and Approval of the Methodology Proposed to Calculate Distributions on Accepted Claims ("Motion"). See Mr. Mele's February 14, 2006 filing attached as **Exhibit 1**. Mr. Mele was a bondholder of a bond issue known as the Jose Eber Salons bond issue. This bond issue had been addressed to pragmatic finality prior to the May 18, 2004 institution of the Sentinel Trust Receivership. The bonds in this issue were not secured, and the losses to the bondholders, as the Receiver understood the situation from prior Sentinel Trust management, were total in scope. It was also the Receiver's understanding 1) that information concerning the bonds being of "no value" and 2) the fact that all efforts to recover on collateral had not yielded amounts for payment to bondholders had been communicated to the Jose Eber bondholders long before the May 18, 2004 institution of the Sentinel Trust Receivership.

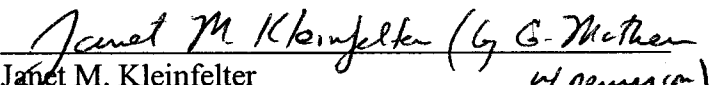
Against this backdrop, Mr. Mele filed a claim against the Sentinel Trust Receivership estate claiming the full amount of his \$50,000 Jose Eber bond. The Schedule of Claim Determinations recommends denial of his claim. Mr. Mele objects, the basis of his Objection being the alleged "theft of the Jose Eber bond fund money."

The reason given in the Schedule of Claim Determinations for the denial of Mr. Mele's claim is that collateral proceeds had been exhausted and, thus, there were, as of May 18, 2004, no funds on deposit in the Pooled Fiduciary Account regarding the Jose Eber bond issue. The main focus of the proof of claim process is to address those claimants whose claims relate to bond issues for which there were supposed to be funds on deposit in the Pooled Fiduciary Account.

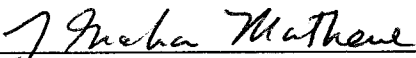
Both the acting Commission-in-Possession and Receiver are sympathetic to Mr. Mele's situation. The loss of a \$50,000 investment can be devastating. But, the hard fact is that there were no collateral proceeds nor any other funds being held by Sentinel Trust regarding the Jose Eber bond issue and, thus, Mr. Mele's claim should be denied. The Objection filed by Mr. Mele provides no reason to alter that determination.

Accordingly, the acting Commissioner-in-Possession and Receiver request that the Court overrule Mr. Mele's Objection.

Respectfully submitted,

  
Janet M. Kleinfelter (by G. Mather  
w/ permission)  
Attorney General's Office  
425 5<sup>th</sup> Avenue North  
P.O. Box 20207  
Nashville, TN 37243  
(615) 741-7403

*Counsel for Acting Commissioner Greg Gonzales*

  
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J. Graham Matherne, BPR #11294  
Wyatt, Tarrant & Combs, LLP  
2525 West End Avenue, Suite 1500  
Nashville, TN 37203-1423  
(615) 244-0020

*Counsel for Receivership Management, Inc.,  
Receiver of Sentinel Trust Company*

**NOTICE OF HEARING OF MOTION**

**THE COMMISSIONER-IN-POSSESSION'S AND RECEIVER'S MOTION SEEKING APPROVAL OF THE SCHEDULE OF CLAIM DETERMINATIONS AND APPROVAL OF THE METHODOLOGY PROPOSED TO CALCULATE DISTRIBUTIONS ON ACCEPTED CLAIMS IS SET TO BE HEARD ON WEDNESDAY, THE 12<sup>TH</sup> DAY OF APRIL, 2006, AT 1:00 P.M. AT THE LEWIS COUNTY COURTHOUSE IN HOHENWALD, LEWIS COUNTY, TENNESSEE.**

**CERTIFICATE OF SERVICE**

This is to certify that on March 24<sup>th</sup>, 2006 a copy of the foregoing Reply has been sent by First Class U.S. Mail, postage paid, and also by facsimile as noted, to:

James S. Chase  
John A. Decker  
Hunton & Williams LLP  
900 South Gay Street, Suite 2000  
P.O. Box 951  
Knoxville, TN 37901

Carrol D. Kilgore  
Attorney at Law  
95 White Bridge Road  
Suite 509, Cavalier Building  
Nashville, TN 37205-1427  
also via fax (615-356-8138)

Donald Schwendimann  
12 East Fourth Avenue  
P.O. Box 366  
Hohenwald, TN 38462  
also via fax (931-796-5692)

Larry Stewart  
Stokes, Bartholomew, Evans & Petree  
424 Church Street, Suite 2800  
Nashville, TN 37219


David D. Peluso  
P.O. Box 250  
Hohenwald, TN 38462-0250

James S. Hereford, Jr.  
310 W. College Street  
P.O. Box 802  
Fayetteville, TN 37334-0802

William B. Hubbard  
Weed, Hubbard, Berry & Doughty  
SunTrust Bank Bldg., Suite 1420  
201 Fourth Avenue North  
Nashville, TN 37219

Diana M. Thimmig  
Roetzel & Andress  
1375 East Ninth Street  
One Cleveland Center, Ninth Floor  
Cleveland, OH 44114

John Mele  
95 Midland Boulevard  
Maplewood, NJ 07040

  
\_\_\_\_\_  
J. Graham Matherne

FILED  
AT 10:20 O'CLOCK A.M.

FEB 14 2006

JANET WILLIAMS, CLERK & MASTER  
BY *Alina Wix*

75 MIDLAND BOULEVARD  
MAPLEWOOD, NEW JERSEY  
07040  
FEBRUARY 10, 2006

RE: CLAIM-172560 - JOSE EBER BOND ISSUE

SIR:

I OBJECT TO YOUR DECISION  
OF \$0 APPROVED FOR MY CLAIM  
OF \$50,000 DUE ME ON THE  
THEFT OF THE JOSE EBER BOND  
FUNDS MONEY.

I AGAIN INFORM YOU TO FORWARD  
MY \$50,000 DUE ME AT THE  
EARLIEST POSSIBLE DATE.

*John Mele*  
JOHN MELE

EXHIBIT

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