

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

IN RE:)	
)	Case No. 09-18086-RGM
GORDON PROPERTIES, LLC)	Chapter 11
CONDOMINIUM SERVICES, INC.,)	
)	Jointly Administered
Debtors.)	
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RESPONSE TO MOTION FOR CLARIFICATION
REGARDING DUE PROCESS

COMES NOW First Owner’s Association of Forty Six Hundred Condominium, Inc.’s (“FOA”), by counsel, and makes the following Response to the Examiner, Stephen E. Leach’s Motion for Clarification.

1. FOA has no objection to the Examiner interviewing the members of FOA’s Special Litigation Committees and other FOA witnesses.
2. FOA has no objection to the Examiner interviewing Bryan Sells, Managing Member of Gordon Properties, LLC and other Gordon Properties, LLC witnesses without the attendance and right to cross examine said witnesses by FOA’s counsel.

WHEREFORE, for the reasons set forth hereinabove Defendant, First Owner’s Association of Forty Six Hundred Condominium, Inc., by counsel states that it has no objection to the Examiner, Stephen E. Leach, holding the interview of Bryan Sells, or other witnesses of Gordon Properties, LLC without the attendance and right to cross examine these witnesses by FOA’s counsel.

FIRST OWNERS’ ASSOCIATION OF FORTY
SIX HUNDRED CONDOMINIUM, INC.
By Counsel

John T. Donelan, Esquire
Virginia State Bar Id. No.18049
125 South Royal Street
Alexandria, Virginia 22314
Phone (703) 684-7555
*Counsel for First Owner’s Association of
Forty Six Hundred Condominium, Inc.*

LAW OFFICE OF JOHN T. DONELAN

/s/ John T. Donelan
JOHN T. DONELAN, ESQUIRE
Virginia State Bar Identification No.18049
125 South Royal Street
Alexandria, Virginia 22314
Phone (703) 684-7555
Fax (703) 684-0981
*Counsel for First Owner's Association of
Forty Six Hundred Condominium, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of July, 2013 a true copy of the foregoing Response to Motion for Clarification was sent via email to: Donald F. King, Esquire, donking@ofplaw.com.; Joseph A. Guzinski, Esquire, joseph.a.guzinski@usdoj.gov.; Jeremy Brian Root, Esquire, jroot@bklawva.com; Bradley David Jones, Esquire, bradley.d.jones@usdoj.gov.; and Stephen E. Leach, Esquire, sleach@ltblaw.com.

/s/ John T. Donelan
JOHN T. DONELAN