UNITED STATES BANKRUPTCY COURT MIDDLE DISTRICT OF FLORIDA

In Re: KJB SPECIALITIES

Chapter 11

Debtor

Case No. 17-00913

AFFIDAVIT OF PAULINE BATCHA

- I, Pauline Batcha, am a Bankruptcy Agent for Ally Servicing LLC. Ally Servicing LLC is the authorized servicer for Ally Financial (hereinafter "Creditor") and I am authorized to act as the Creditor's representative. I declare under penalty of perjury that the following is true and correct based upon my personal review of certain business records maintained by Creditor relating to the subject account. That I am informed and believe such business records were made at or near the time by, or from information transmitted by, a person with knowledge, kept in the ordinary course of Creditor's regularly conducted business activity.
- 1. On March 7, 2014, KJB SPECIALITIES entered into a retail installment sale contract (hereinafter "Contract") with dealer for the purchase of the following collateral: 2006 PORSCHE CAYENNE VIN WP1AB29P06LA62093 (hereinafter "Collateral"). The Contract calls for consecutive monthly payments of \$508.09. Dealer thereafter assigned the Contract and title to Creditor, which holds a security interest in the Collateral. True and correct copies of the Contract and title are attached hereto as Exhibits A and B.
- 2. The fair market value of the Collateral is \$12,500.00.
- 3. The net payoff owing under the contract, including any accrued late and/or unpaid charges, totals \$14,553,82.
- 4. Creditor has not been able to verify whether appropriate insurance coverage exists protecting its Collateral, as required by the Contract.
- 5. No plan has been filed to date by the Debtor.
- 6. The Contract is in default and currently due for the January 21, 2017 payment. Contractually, the pre-petition defaults total \$1,306.13 and the post-petition payment defaults total \$2,032.36. No post-petition payments have been received. The total defaults (pre and post-petition) under the Contract including any accrued late and/or unpaid charges total \$3,338.49.

Dated: June 23, 2017

By:

Pauline Batcha

Subscribed and sworn to before me

Wotary

TEGAN MARIE WILSON
Notary Public
State of Minnesota
My Commission Expires
January 31, 2021

CERTIFICATE OF SERVICE

IHEREBY CERTIFY that a true copy of the foregoing has been served on Lugal, 2017, by electronic notice if registered in the Electronic Case Filing system, otherwise by U.S. Mail to: K.J.B. Specialties, Inc., 1551 Edgewood Avenue West, Jacksonville FL 32208, Debtor, Jason A. Burgess, 1855 Mayport Road, Altantic Beach, FL 32233, Attorney for Debtor, Office of the U.S. Trustee, 135 West Central Boulevard, Suite 620, Orlando, FL 32801, and to the Parties-In-Interest List-pursuant to Local Rule 1007-2.

RUSH, MARSHALL, JONES and KELLY, P.A.

Attorneys for Creditor

By: /s/ Andrew W. Houchins

Andrew W. Houchins, for the firm

Florida Bar No. 59017 Telephone 407-425-5500 Facsimile 407-423-0554

primary email: ahouchins@rushmarshall.com secondary email: arivera@rushmarshall.com

SEND MAIL NOTICES TO: RUSH, MARSHALL, JONES and KELLY, P.A. Attn:Andrew W. Houchins Post Office Box 3146 Orlando, FL 32802-3146

1621.70544 Y8241 1204