

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

<b>IN RE:</b>	§	<b>Chapter 11</b>
	§	
<b>CD LIQUIDATION CO., LLC, f/k/a</b>	§	<b>Case No. 09-13038 (KG)</b>
<b>CYNERGY DATA, LLC, et al,<sup>1</sup></b>	§	<b>Jointly Administered</b>
	§	
	§	<b>Hearing Date: 11/12/10 @ 11:00 a.m.</b>
<b>Debtors.</b>	§	<b>Objections Due: 11/05/10 @ 4:00 p.m.</b>
		<b>Re: D.I. 988</b>

**RESPONSE OF WORLDVENTURES MARKETING, INC. TO DEBTOR'S  
FOURTH OMNIBUS (SUBSTANTIVE) OBJECTION TO CLAIMS**

COMES NOW, WorldVentures Marketing, Inc. (“WorldVentures”), and files this, its Response to Debtor’s Fourth Omnibus (Substantive) Objection to Claims (the “Objection”), and in support thereof would respectfully show the Court as follows:

**Background**

1. WorldVentures Marketing, Inc. is a creditor of the Debtor in the CD Liquidation Co., LLC f/k/a Cynergy Data, LLC, et al, jointly administered bankruptcy: Cynergy Data, LLC (“Cynergy Data”), Cynergy Holdings, Inc. (“Cynergy Holdings”) and/or Cynergy Prosperity Plus, LLC (“Cynergy Prosperity”) (collectively herein the “Debtors”).

2. On September 1, 2009 (the “Petition Date”), Debtors filed their voluntary petitions under Chapter 11 of the Bankruptcy Code.

3. On January 29, 2010, WorldVentures filed with the claims agent, Kurtzman Carson Consultants, claims in the amount of \$260,000.00 each against Cynergy Data,

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<sup>1</sup> The Debtors are the following entities (with the last four digits of their federal tax identification numbers in parentheses): CD Liquidation Co., LLC f/k/a Cynergy Data, LLC (8677); Cynergy Data Holdings, Inc. (8208); CD Liquidation Co. Plus, LLC f/k/a Cynergy Prosperity Plus, LLC (4265). The mailing address for the Debtors is 30-30 47<sup>th</sup> Avenue, 9<sup>th</sup> Floor, Long Island City, New York 11101.

Cyneregy Holdings and Cyneregy Prosperity asserting a fee ownership interest in the monies held in reserve by the Debtors (the “WorldVentures Claims”).

4. On September 13, 2010, the Court entered an order that claims be paid by the Debtors’ purchaser through a cure reserve to the requesting merchant.

5. Subsequently, WorldVentures made demand upon the purchaser for payment on the WorldVentures Claims pursuant to the Court’s Order. WorldVentures has not received payment.

6. On October 8, 2010, Debtors filed their Fourth Omnibus (Substantive) Objection of the Debtors to Claims Pursuant to 11 U.S.C. § 502(B), Fed. R. Bankr. P. 3003 and 3007 and Local Rule 3007-1 whereby they seek to disallow the WorldVentures Claims.

**Request for Relief**

7. WorldVentures requests that the Debtor’s objection be overruled or deferred unless and until WorldVentures receives full payment on the WorldVentures Claims.

**WHEREFORE, PREMISES CONSIDERED,** WorldVentures respectfully requests that the Court overrule or defer the Debtor’s objection unless and until WorldVentures receives payment on the WorldVenture Claims, and grant to it such other relief to which it is justly entitled.

Dated: November 9, 2010

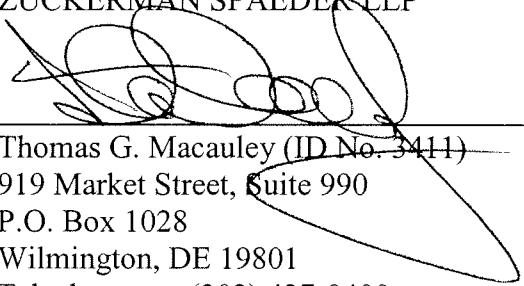
Respectfully submitted,

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-and-

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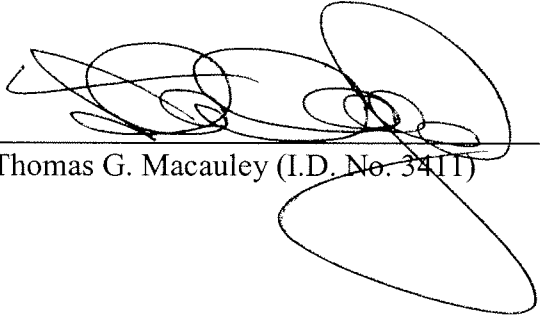
Attorneys for WorldVentures Marketing, Inc.

**CERTIFICATE OF SERVICE**

This is to certify that on the November 9, 2010, a true and correct copy of the above and foregoing Response of WorldVentures Marketing, LLC to Debtor's Fourth Omnibus (Substantive) Objection to Claims was served by facsimile on:

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