

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

In re:

CYNERGY DATA, LLC, et al.,

Debtors.

Chapter 11

Case No. 09-13038 (KG)

(Jointly Administered)

**OBJECTION OF PROCESS AMERICA TO DEBTORS' NOTICE
OF INTENT TO ASSUME AND ASSIGN CERTAIN UNEXPIRED LEASES
AND EXECUTORY CONTRACTS AND SETTING FORTH THE CURE
AMOUNTS AND GENERAL RESERVATION OF RIGHTS**

Process America, by and through its undersigned attorneys, files this Objection and general reservation of rights with respect to the *Notice of Debtors' Intent to Assume and Assign Certain Unexpired Leases and Executory Contracts and Setting Forth the Cure Amounts* (the "Cure Notice"), mailed to all counterparties to the Debtors' unexpired leases and executory contracts in anticipation of the impending sale of the Debtors' assets. In support of this Objection, Process America respectfully represents as follows:

1. Process America hereby objects to the Cure Notice and provides notice that there is a dispute in connection with the proposed cure amounts listed by the Debtors in the Cure Notice with respect to the merchants identified on Exhibit A attached hereto and incorporated herein by reference.

2. Pursuant to section 365 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.*, the Debtors are required to cure defaults under their executory contracts in order to assume and assign the contracts. 11 U.S.C. § 365(b)(1).

3. As illustrated on Exhibit A, the Debtors have failed to identify the accurate rolling reserve cure amounts (the "Rolling Reserve") withheld after May 1, 2009 in trust for and owed to several merchants who are Process America clients. Although the Debtors state the Rolling

Reserve amount owed is \$799,852.39,¹ the correct amount is \$974,024.86 as of September 30, 2009. *See* Exhibit A. Exhibit A was created by Process America after obtaining and confirming the correct reserve amounts by utilizing the Virtual Merchant Application System (“VIMAS”) software program, which is owned and operated by the Debtors.

4. In addition, the Debtors mistakenly identified a \$1,538,866.25 cure payment as being owed to Process America. These pre-petition fixed reserve funds (the “Merchant Reserve Funds”; and together with the Rolling Reserve, the “Reserves”) were/are held in trust by the Debtors and are payable to seventy-six (76) merchants as identified on Exhibit A.

5. Furthermore, the Cure Notice fails to identify approximately \$3 million in suspended funds owed to several merchants who are Process America clients. These suspended funds are temporarily being held by the Debtors pending review of questionable credit card transactions (*i.e.*, funds held to pay for potential questionable, problematic and/or unauthorized charges) and should have been released to the merchants once the transactions are confirmed to be valid. Similar to the rolling reserves, the amount of suspended funds held in trust by the Debtors varies on a daily basis. During these bankruptcy proceedings, the Debtors have not accounted for the suspended funds held in trust, including where the funds are located and how much is being held per merchant. Before the Court approves any assumption and assignment, the Debtors must be compelled to address the suspended funds issue and cure any associated defaults.

6. Cynergy Data and Process America are parties to the May 19, 2004 ISO Processing Agreement (the “ISO Contract”). Upon information and belief, the Debtors intend to assume and assign the ISO Contract. This can only be accomplished if the following cure

¹ Upon information and belief, the Debtors attempted to identify the reserve amounts outstanding as of September 1, 2009 (the “Petition Date”).

requirements are met: (1) the Reserves identified above are returned to the merchants pursuant to the terms of the Merchant Processing Agreements (the “MPAs”); (2) the suspended funds are accounted for and returned to the merchants pending review and confirmation that the transactions are valid; (3) the Debtors pay the outstanding post-petition residual processing fees owed to Process America for September 2009 and October 2009 through the yet to be determined Closing Date, as that term is defined in the August 26, 2009 Asset Purchase Agreement; (4) as set forth below any amounts in excess of \$250,000 in the Comerica Bank reserve account are paid to Process America; and (5) as set forth below Process America’s reasonable attorneys’ fees are paid.

7. To fully cure all monetary defaults under the ISO Contract, Process America is entitled to recover reasonable attorneys’ fees pursuant to the terms of the ISO Contract. *See, e.g., Travelers Casualty & Surety Co. v. Pacific Gas & Elec. Co.*, 549 U.S. 443 (2007); *In re Crown Brooks Corp.*, 269 B.R. 12 (Bankr. D. Del. 2001). The Cure Notice fails to provide for allowance of reasonable attorneys’ fees and costs incurred by Process America in enforcing its contractual rights under Section 4.5 of the ISO Contract. For example, among other things, Process America incurred legal fees and expenses in procuring the Debtors’ reimbursement of \$156,177.99 from the Comerica Bank reserve account on or about September 21, 2009. Notably, the Comerica Bank reserve account is capped at \$250,000.00, and the Debtors had exceeded that amount in violation of Section 3.11(C)(i) of the ISO Contract. This Objection also serves as notice to the Debtors and any purchaser that the Comerica Bank reserve account may not exceed \$250,000.00 and that any excess amount constitutes a cure amount that must be paid to Process America.

8. Finally, Process America reserves all of its rights to amend, supplement, or otherwise modify this Objection as necessary or proper; and to raise such other and further objections to any other proposed cure payments listed on the Cure Notice; and to assert all of its rights and claims at the October 7, 2009 Sale Hearing. Indeed, Process America vigorously opposes any arguments that may be raised by any party that no cure amount is owed under the MPAs with respect to the rolling reserves that are held in trust for the merchants.

WHEREFORE, Process America respectfully requests that the Court sustain this Objection, and enter of an order granting (1) the cure amounts as identified in Exhibit A, (2) reasonable attorneys' fees to Process America, and (3) such other and further relief as the Court deems just and proper.

Dated: October 6, 2009

HUNTON & WILLIAMS LLP

/s/ Jason W. Harbour

Jason W. Harbour, Esq.
(DE Bar No. 4176)
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, Virginia 23219-4074
Telephone: (804) 788-8200
Facsimile: (804) 788-8218
Email: jharbour@hunton.com

-and-

Andrew Kamensky, Esq.
Mellon Financial Center
1111 Brickell Avenue, Suite 2500
Miami, Florida 33131
Telephone: (305) 810-2500
Facsimile: (305) 810-4260
Email: akamensky@hunton.com

Counsel for Process America

CERTIFICATE OF SERVICE

I, Andrew Kamensky, hereby certify that on October 6, 2009, I caused a true and correct copy of the foregoing *Objection of Process America to Debtors' Notice of Intent to Assume and Assign Certain Unexpired Leases and Executory Contracts and Setting Forth the Cure Amounts and General Reservation of Rights* to be served upon counsel listed below electronically through the Court's CM/ECF System and via U.S. first class mail:

David B. Stratton, Esq.
Evelyn J. Meltzer, Esq.
John H. Schanne, II, Esq.
Pepper Hamilton LLP
Hercules Plaza, Suite 5100
1313 Market Street
P.O. Box 1709
Wilmington, DE 19899-1709
*Counsel for the Debtors
and Debtors in Possession*

Office of the United States Trustee
J. Caleb Boggs Federal Building
844 North King Street, Suite 2207
Lockbox 35
Wilmington, DE 19801

Gregory A. Taylor, Esq.
Ashby & Geddes, P.A.
500 Delaware Avenue, 8th Floor
P.O. Box 1150
Wilmington, DE 19899
*Co-counsel for the Official Committee of
Unsecured Creditors*

Peter S. Burlte, Esq.
Paul, Hastings, Janofsky & Walker LLP
515 South Flower Street
Twenty-Fifth Floor
Los Angeles, CA 90071
Counsel for Wells Fargo Foothill LLC

Mark N. Berman, Esq.
Dennis J. Drebsky, Esq.
Lee Harrington, Esq.
Nixon Peabody LLP
437 Madison Avenue
New York, New York 10022
*Counsel for the Debtors
and Debtors in Possession*

Bruce F. Smith, Esq.
Jager Smith P.C.
One Financial Center
Boston, Massachusetts, 02111
*Co-counsel for the Official Committee of
Unsecured Creditors*

Robert J. Diehl, Jr., Esq.
Bodman LLP
6th Floor at Ford Field
1901 St. Antoine Street
Detroit, Michigan 48226
Counsel for Comerica Bank

Gregory A. Bray, Esq.
Milbank, Tweed, Hadley & McCloy LLP
1 Chase Manhattan Plaza
New York, NY 10005
*Counsel for Dymas Funding Company LLC,
Ableco Finance LLC and A3 Funding LP*

Peter J. Antoszyk, Esq.
Proskauer Rose LLP
1585 Broadway
New York, NY 10036
Counsel for Garrison Credit Investments

Susan F. Balaschak, Esq.
Akerman Senterfitt LLP
335 Madison Ave., Suite 2600
New York, NY 10017
Counsel for the Purchaser

Alison D. Bauer, Esq.
Torys LLP
237 Park Avenue
New York, NY 10017
Counsel for Harris Bank

Sheila Corvino, Esq.
Pipeline Data, Inc.
4400 North Point Parkway
Alpharetta, GA 30022

/s/ Andrew Kamensky

Andrew Kamensky

EXHIBIT “A”

CYNERGY DATA MERCHANT RESERVE FUNDS AND ROLLING RESERVE

| MERCHANT NAME | MID# | RESERVE FUNDS HELD BY CYNERGY DATA NOT INCLUDED IN ROLLING RESERVE | ROLLING RESERVE COLLECTED BY CYNERGY DATA AS OF 09/30/2009 | TOTAL OF RESERVE FUNDS AND ROLLING RESERVE | CURE AMOUNT FROM NOTICE OF DEBTORS' INTENT TO ASSUME AND ASSIGN | DIFFERENCE BETWEEN TOTAL OF RESERVE FUNDS AND ROLLING RESERVE, AND THE DEBTORS' LISTED CURE AMOUNT |
|-------------------------------------|------------------|--|--|--|---|--|
| AFL FINANCIAL SERVICES | 3899000001231073 | \$ 10,530.85 | \$ 56,412.30 | \$ 66,943.15 | \$ 47,586.30 | \$ 19,356.85 |
| ALPHA GROUP ADVISORS 1 | 3899000001312204 | | \$ 33,727.30 | \$ 33,727.30 | \$ 30,651.30 | \$ 3,076.00 |
| ALPHA GROUP ADVISORS 2 | 3899000001312238 | | \$ 33,182.45 | \$ 33,182.45 | \$ 30,168.70 | \$ 3,013.75 |
| AMERICAN EQUITY MANAGEMENT | 3899000001423431 | | \$ 4,368.00 | \$ 4,368.00 | \$ 2,768.75 | \$ 1,599.25 |
| AP Products LLC | 3899000000865228 | \$ 28,281.24 | \$ - | \$ 28,281.24 | | \$ 28,281.24 |
| AP Products LLC 2 | 3899000000865418 | \$ 27,890.79 | \$ - | \$ 27,890.79 | | \$ 27,890.79 |
| BIMINI ISLAND AIR | 3899000001025491 | \$ 21,554.24 | \$ 47,632.69 | \$ 69,186.93 | \$ 40,405.31 | \$ 28,781.62 |
| BROADCAST LINK CORP | 3899000001206794 | \$ 31,622.72 | \$ 43,167.07 | \$ 74,789.79 | \$ 36,607.20 | \$ 38,182.59 |
| BROADCAST LINK CORP 2 | 3899000001355328 | | \$ 25,531.84 | \$ 25,531.84 | \$ 21,438.51 | \$ 4,093.33 |
| CHARITY FOLKS | 3899000001044658 | \$ 6,744.78 | \$ - | \$ 6,744.78 | | \$ 6,744.78 |
| CLEAR FINANCIAL SOLUTIONS | 3899000001174380 | \$ 27,913.17 | \$ 89,115.66 | \$ 117,028.83 | \$ 52,267.16 | \$ 64,761.67 |
| CONNECT GROUP SERVICES | 3899000001247731 | \$ 7,000.32 | \$ 99,504.75 | \$ 106,505.07 | \$ 72,310.50 | \$ 34,194.57 |
| COUNTRYWIDE TIMESHARES | 3899000001154630 | \$ 14,679.79 | \$ - | \$ 14,679.79 | | \$ 14,679.79 |
| CREATIVE VACATION SOLUTIONS | 3899000001238672 | \$ 99.07 | \$ 53,237.60 | \$ 53,336.67 | \$ 31,136.60 | \$ 22,200.07 |
| DCPS FINANCIAL | 3899000001331741 | \$ 1,843.17 | \$ 47,915.10 | \$ 49,758.27 | \$ 47,765.85 | \$ 1,992.42 |
| DYNAMIC FINANCIAL GROUP USA | 3899000001218187 | \$ 24,693.10 | \$ 16,603.25 | \$ 41,296.35 | \$ 15,124.75 | \$ 26,171.60 |
| DYNAMIC FINANCIAL GROUP USA 2 | 3899000001220530 | \$ 16,558.26 | \$ 13,939.25 | \$ 30,497.51 | \$ 12,483.00 | \$ 18,014.51 |
| Event America | 3899000000579803 | \$ 64,835.44 | \$ - | \$ 64,835.44 | | \$ 64,835.44 |
| EXOTIC HOME | 3899000001280732 | \$ 573.48 | \$ - | \$ 573.48 | | \$ 573.48 |
| EZINCOME 1 | 3899000001135761 | \$ 10,863.47 | \$ - | \$ 10,863.47 | | \$ 10,863.47 |
| EZINCOME 2 | 3899000001135787 | \$ 10,809.72 | \$ - | \$ 10,809.72 | | \$ 10,809.72 |
| EZINCOME 3 | 3899000001142395 | \$ 8,852.56 | \$ - | \$ 8,852.56 | | \$ 8,852.56 |
| EZINCOME 4 | 3899000001142437 | \$ 2,845.46 | \$ - | \$ 2,845.46 | | \$ 2,845.46 |
| EZINCOME 6 | 3899000001173077 | \$ 5,391.49 | \$ - | \$ 5,391.49 | | \$ 5,391.49 |
| EZINCOME 7 | 3899000001175593 | \$ 5,388.03 | \$ - | \$ 5,388.03 | | \$ 5,388.03 |
| EZINCOME 8 | 3899000001178894 | \$ 5,694.81 | \$ - | \$ 5,694.81 | | \$ 5,694.81 |
| FIRST UNIVERSAL MARKETING SOLUTIONS | 3899000000912608 | \$ 102,122.16 | \$ - | \$ 102,122.16 | | \$ 102,122.16 |
| FON PILOT | 3899000001007622 | \$ 211.88 | \$ 389.75 | \$ 601.63 | \$ 389.75 | \$ 211.88 |
| FUSION LABS | 3899000001119260 | \$ 24,268.32 | \$ 5,061.87 | \$ 29,330.19 | \$ 4,611.29 | \$ 24,718.90 |
| FUSION LABS 2 | 3899000001129863 | \$ 11,055.73 | \$ 2,708.80 | \$ 13,764.53 | \$ 2,584.99 | \$ 11,179.54 |

| | | | | | | | | | | | |
|------------------------------|-------------------|----|------------|----|-----------|----|------------|----|-----------|----|------------|
| FUSION LABS 3 | 3899000001129897 | \$ | 7,076.23 | \$ | 3,222.05 | \$ | 10,298.28 | \$ | 3,144.90 | \$ | 7,153.38 |
| FUSION LABS 4 | 3899000001129921 | \$ | 5,611.80 | \$ | 4,140.05 | \$ | 9,751.85 | \$ | 3,902.70 | \$ | 5,849.15 |
| FUSION LABS 5 | 3899000001129947 | \$ | 934.23 | \$ | 1,895.05 | \$ | 2,829.28 | \$ | 1,741.69 | \$ | 1,087.59 |
| GRANT SEARCH FINDER I | 3899000001164787 | \$ | 9,334.79 | \$ | - | \$ | 9,334.79 | \$ | | \$ | 9,334.79 |
| H AND K FINANCIAL | 3899000001326667 | \$ | 386.49 | \$ | 6,177.75 | \$ | 6,564.24 | \$ | 6,177.75 | \$ | 386.49 |
| HD PRODUCTS | 3899000001245438 | \$ | 228.43 | \$ | 2,647.81 | \$ | 2,876.24 | \$ | | \$ | 2,876.24 |
| HERBAL SAVERS I | 3899000001165578 | \$ | 10,034.58 | \$ | - | \$ | 10,034.58 | \$ | | \$ | 10,034.58 |
| HERBAL SAVERS II | 3899000001169158 | \$ | 2,664.66 | \$ | - | \$ | 2,664.66 | \$ | | \$ | 2,664.66 |
| HOME SURVEY WORKERS | 3899000001157617 | \$ | 28,490.78 | \$ | - | \$ | 28,490.78 | \$ | | \$ | 28,490.78 |
| HOMERUN MEDIA LLC | 38990000000995199 | \$ | 12,548.82 | \$ | - | \$ | 12,548.82 | \$ | | \$ | 12,548.82 |
| HOMERUN MEDIA LLC 2 | 38990000000995272 | \$ | 10,244.13 | \$ | - | \$ | 10,244.13 | \$ | | \$ | 10,244.13 |
| HOMERUN MEDIA LLC 3 | 38990000000995512 | \$ | 3,142.09 | \$ | - | \$ | 3,142.09 | \$ | | \$ | 3,142.09 |
| J2 INCORPORATED | 3899000001227147 | \$ | 7,078.46 | \$ | 11,013.48 | \$ | 18,091.94 | \$ | 9,094.60 | \$ | 8,997.34 |
| J2 INCORPORATED 2 | 3899000001245271 | \$ | 643.80 | \$ | 1,054.97 | \$ | 1,698.77 | \$ | 1,002.48 | \$ | 696.29 |
| J2 INCORPORATED 3 | 3899000001264488 | \$ | 48.99 | \$ | 3.44 | \$ | 52.43 | \$ | 3.44 | \$ | 48.99 |
| JGJ MARKETING INC | 3899000001300597 | \$ | 7,654.52 | \$ | - | \$ | 7,654.52 | \$ | | \$ | 7,654.52 |
| LASER AD GROUP | 3899000000267433 | \$ | | \$ | 2,740.58 | \$ | 2,740.58 | \$ | 2,740.58 | \$ | - |
| LEARNING ANNEX LLC | 3899000001157104 | \$ | 3,323.20 | \$ | 3,961.18 | \$ | 7,284.38 | \$ | 2,856.24 | \$ | 4,428.14 |
| MC Consulting Associates Inc | 3899000000699783 | \$ | 21,774.84 | \$ | 3,286.25 | \$ | 25,061.09 | \$ | 3,286.25 | \$ | 21,774.84 |
| Medical Health Network | 3899000000627602 | \$ | 42,596.05 | \$ | - | \$ | 42,596.05 | \$ | | \$ | 42,596.05 |
| PARAMOUNT MARKETING INC. | 3899000000945004 | \$ | 1,046.31 | \$ | - | \$ | 1,046.31 | \$ | | \$ | 1,046.31 |
| PDM INET YLW PGS | 3899000000544526 | \$ | 3,721.79 | \$ | 24.85 | \$ | 3,746.64 | \$ | 24.85 | \$ | 3,721.79 |
| PDM International Inc | 3899000000544500 | \$ | 106,593.59 | \$ | 81,458.02 | \$ | 188,051.61 | \$ | 68,957.14 | \$ | 119,094.47 |
| PDM International Number 2 | 3899000000781276 | \$ | 54,798.37 | \$ | 43,953.21 | \$ | 98,751.58 | \$ | 38,263.54 | \$ | 60,488.04 |
| PDM Intl 3 | 3899000000848752 | \$ | 47,570.23 | \$ | 43,215.20 | \$ | 90,785.43 | \$ | 37,535.05 | \$ | 53,250.38 |
| PDM Intl 4 | 3899000000885846 | \$ | 42,927.91 | \$ | 44,426.97 | \$ | 87,354.88 | \$ | 38,179.96 | \$ | 49,174.92 |
| PDM Intl 5 | 3899000000956001 | \$ | 43,127.09 | \$ | 75,602.17 | \$ | 118,729.26 | \$ | 64,078.91 | \$ | 54,650.35 |
| PREFERRED PROPERTY SERVICES | 3899000001150620 | \$ | 916.02 | \$ | - | \$ | 916.02 | \$ | | \$ | 916.02 |
| RES CTR ITL 2 | 3899000000986537 | \$ | 2,224.94 | \$ | - | \$ | 2,224.94 | \$ | | \$ | 2,224.94 |
| SDAME I | 3899000001306727 | \$ | 3,092.16 | \$ | 1,719.73 | \$ | 4,811.89 | \$ | 1,719.73 | \$ | 3,092.16 |
| SDAME II | 3899000001308970 | \$ | 2,145.33 | \$ | 1,673.71 | \$ | 3,819.04 | \$ | 1,673.71 | \$ | 2,145.33 |
| SDAME III | 3899000001309465 | \$ | 2,038.17 | \$ | 597.50 | \$ | 2,635.67 | \$ | 597.50 | \$ | 2,038.17 |
| SDAME IV | 3899000001309572 | \$ | 1,921.12 | \$ | 1,294.51 | \$ | 3,215.63 | \$ | 1,294.51 | \$ | 1,921.12 |
| Shores Escape | 3899000000753788 | \$ | 47,094.78 | \$ | - | \$ | 47,094.78 | \$ | | \$ | 47,094.78 |
| Showcase Resorts | 3899000000554822 | \$ | 170,901.89 | \$ | - | \$ | 170,901.89 | \$ | | \$ | 170,901.89 |
| SOVAN INC | 3899000001263670 | \$ | 536.06 | \$ | 184.62 | \$ | 720.68 | \$ | 184.62 | \$ | 536.06 |
| SUN TRAVEL CLUB VACATIONS | 3899000001302247 | \$ | | \$ | 278.60 | \$ | 278.60 | \$ | 278.60 | \$ | - |
| SUPER FOODS | 3899000001251311 | \$ | 6,560.95 | \$ | 3,264.02 | \$ | 9,824.97 | \$ | 1,635.04 | \$ | 8,189.93 |

| | | | | | | | | | | | |
|------------------------|------------------|----|---------------------|----|-------------------|----|---------------------|----|-------------------|----|---------------------|
| SUPER FOODS | 3899000001253770 | \$ | 12,844.48 | \$ | 755.71 | \$ | 13,600.19 | \$ | 2,611.75 | \$ | 10,988.44 |
| SUPER FOODS | 3899000001257847 | \$ | 11,584.68 | \$ | 2,611.75 | \$ | 14,196.43 | \$ | 3,264.02 | \$ | 10,932.41 |
| SUPER FOODS | 3899000001261823 | \$ | 6,299.74 | \$ | 1,635.04 | \$ | 7,934.78 | \$ | 755.71 | \$ | 7,179.07 |
| SUPER FOODS | 3899000001266582 | \$ | 10,417.50 | \$ | 1,750.95 | \$ | 12,168.45 | \$ | 1,750.95 | \$ | 10,417.50 |
| Telemzgz | 3899000000990570 | \$ | 25,313.36 | \$ | - | \$ | 25,313.36 | \$ | | \$ | 25,313.36 |
| Telemzgz 2 | 3899000001011913 | \$ | 15,744.57 | \$ | - | \$ | 15,744.57 | \$ | | \$ | 15,744.57 |
| Telemzgz 3 | 3899000001012200 | \$ | 20,363.78 | \$ | - | \$ | 20,363.78 | \$ | | \$ | 20,363.78 |
| Telemzgz 4 | 3899000001012309 | \$ | 22,666.80 | \$ | - | \$ | 22,666.80 | \$ | | \$ | 22,666.80 |
| Vacation Promotions | 3899000000607810 | \$ | 160,981.87 | \$ | - | \$ | 160,981.87 | \$ | | \$ | 160,981.87 |
| Vacation Promotions 2 | 3899000000717767 | \$ | 14,839.23 | \$ | - | \$ | 14,839.23 | \$ | | \$ | 14,839.23 |
| Vacation Promotions 4 | 3899000001038221 | \$ | 208.72 | \$ | - | \$ | 208.72 | \$ | | \$ | 208.72 |
| WELLNESS WATCHERS MD 1 | 3899000001150976 | \$ | 26,188.88 | \$ | 3,239.93 | \$ | 29,428.81 | \$ | 3,239.93 | \$ | 26,188.88 |
| WELLNESS WATCHERS 2 | 3899000001154309 | \$ | 15,830.93 | \$ | 3,372.88 | \$ | 19,203.81 | \$ | 3,372.88 | \$ | 15,830.93 |
| ZERO DOWN FORECLOSURE | 3899000001205887 | \$ | 12,223.81 | \$ | 50,325.20 | \$ | 62,549.01 | \$ | 48,183.40 | \$ | 14,365.61 |
| TOTAL | | \$ | 1,538,866.00 | \$ | 974,024.86 | \$ | 2,512,890.86 | \$ | 799,852.39 | \$ | 1,713,038.47 |

The Debtors' Cure Notice identifies \$1,538,866.25 as being owed to Process America. For purposes of clarification, this amount is owed to each of the merchants identified above in the respective amounts listed