

SILVERMANACAMPORA LLP
Counsel to Kenneth P. Silverman, Esq.,
Chapter 7 Trustee
100 Jericho Quadrangle, Suite 300
Jericho, New York 11753
(516) 479-6300
David J. Mahoney
Christopher J. Rubino

Hearing Date: March 4, 2014
Time: 9:30 a.m.

Objections Due: February 25, 2014
Time: 5:00 p.m.

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

-----X
In re:

AGAPE WORLD, INC.,
AGAPE MERCHANT ADVANCE LLC,
AGAPE COMMUNITY LLC, AGAPE
CONSTRUCTION MANAGEMENT LLC,
AGAPE WORLD BRIDGES LLC, AND
114 PARKWAY DRIVE SOUTH LLC,

Debtors.

Chapter 7
Case No.: 09-70660 (DTE)
Substantively Consolidated

-----X
KENNETH P. SILVERMAN, ESQ., as
Chapter 7 Trustee of Agape World, Inc., *et al.*,

Plaintiff,

-against-

Adv. Pro. No.: 11-08213 (REG)

ERICA BALASA,

Defendant.

-----X
KENNETH P. SILVERMAN, ESQ., as
Chapter 7 Trustee of Agape World, Inc., *et al.*,

Plaintiff,

-against-

Adv. Pro. No.: 10-08888 (DTE)

MICHAEL BURNS,

Defendant.
-----X

**NOTICE OF HEARING OF PROPOSED ORDER UNDER
FEDERAL RULE OF BANKRUPTCY PROCEDURE 9019(a) APPROVING
THE STIPULATION SETTLING THE TRUSTEE'S CLAIMS AGAINST ERICA
BALASA AND MICHAEL BURNS AND CLOSING THE ADVERSARY PROCEEDINGS**

PLEASE TAKE NOTICE, that upon the application (the "Motion") of Kenneth P. Silverman, Esq., the chapter 7 trustee (the "Trustee") for the substantively consolidated estate of Agape World, Inc., *et al.*, by his counsel, SilvermanAcampora LLP, the Trustee will move before the Honorable Robert E. Grossman, United States Bankruptcy Judge, at the United States Bankruptcy Court, Courtroom 860, Eastern District of New York at Central Islip, 290 Federal Plaza, Central Islip, New York 11722 on **March 4, 2014 at 9:30 a.m.**, or as soon thereafter as counsel can be heard, for entry of an order granting the Trustee's Motion for an Order Approving the Stipulation of Settlement. A copy of the proposed Order is annexed hereto.

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the relief requested in the Motion or the proposed Order must be (i) made in writing; (ii) electronically filed with the Bankruptcy Court; (iii) delivered to Chambers of the Honorable Robert E. Grossman, United States Bankruptcy Judge, United States Bankruptcy Court, Eastern District of New York, Alfonse M. D'Amato Federal Courthouse, 290 Federal Plaza, Central Islip, New York 11722; (iv) mailed to SilvermanAcampora LLP, 100 Jericho Quadrangle, Suite 300, Jericho, New York 11753, Attn: David J. Mahoney, Esq.; and (v) mailed to the Office of the United States Trustee, 560 Federal Plaza, Central Islip, New York 11722, no later than **5:00 p.m. on February 25, 2014.**

PLEASE TAKE FURTHER NOTICE, that the Hearing may be adjourned without further notice other than by announcement of such adjournment in open Court.

Dated: Jericho, New York
January 22, 2014

SILVERMANACAMPORA LLP
Counsel to Kenneth P. Silverman, Esq., the
Chapter 7 Trustee

By: s/ David J. Mahoney
David J. Mahoney
Member of the Firm
100 Jericho Quadrangle, Suite 300
Jericho, New York 11753
(516) 479-6300

SILVERMANACAMPORA LLP
Counsel to Kenneth P. Silverman, Esq.,
Chapter 7 Trustee
100 Jericho Quadrangle, Suite 300
Jericho, New York 11753
(516) 479-6300
David J. Mahoney
Christopher J. Rubino

Hearing Date: March 6, 2014
Time: 2:00 p.m.

Objections Due: February 27, 2014
Time: 5:00 p.m.

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

-----X
In re:

AGAPE WORLD, INC.,
AGAPE MERCHANT ADVANCE LLC,
AGAPE COMMUNITY LLC, AGAPE
CONSTRUCTION MANAGEMENT LLC,
AGAPE WORLD BRIDGES LLC, AND
114 PARKWAY DRIVE SOUTH LLC,

Debtors.

Chapter 7
Case No.: 09-70660 (DTE)
Substantively Consolidated

-----X
KENNETH P. SILVERMAN, ESQ., as
Chapter 7 Trustee of Agape World, Inc., *et al.*,

Plaintiff,

-against-

Adv. Pro. No.: 11-08213 (REG)

ERICA BALASA,

Defendant.

-----X
KENNETH P. SILVERMAN, ESQ., as
Chapter 7 Trustee of Agape World, Inc., *et al.*,

Plaintiff,

-against-

Adv. Pro. No.: 10-08888 (DTE)

MICHAEL BURNS,

Defendant.
-----X

**NOTICE OF HEARING OF PROPOSED ORDER UNDER
FEDERAL RULE OF BANKRUPTCY PROCEDURE 9019(a) APPROVING
THE STIPULATION SETTLING THE TRUSTEE'S CLAIMS AGAINST ERICA
BALASA AND MICHAEL BURNS AND CLOSING THE ADVERSARY PROCEEDINGS**

PLEASE TAKE NOTICE, that upon the application (the "Motion") of Kenneth P. Silverman, Esq., the chapter 7 trustee (the "Trustee") for the substantively consolidated estate of Agape World, Inc., *et al.*, by his counsel, SilvermanAcampora LLP, the Trustee will move before the Honorable Dorothy T. Eisenberg, United States Bankruptcy Judge, at the United States Bankruptcy Court, Courtroom 760, Eastern District of New York at Central Islip, 290 Federal Plaza, Central Islip, New York 11722 on **March 6, 2014 at 2:00 p.m.**, or as soon thereafter as counsel can be heard, for entry of an order granting the Trustee's Motion for an Order Approving the Stipulation of Settlement. A copy of the proposed Order is annexed hereto.

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the relief requested in the Motion or the proposed Order must be (i) made in writing; (ii) electronically filed with the Bankruptcy Court; (iii) delivered to Chambers of the Honorable Dorothy T. Eisenberg, United States Bankruptcy Judge, United States Bankruptcy Court, Eastern District of New York, Alfonse M. D'Amato Federal Courthouse, 290 Federal Plaza, Central Islip, New York 11722; (iv) mailed to SilvermanAcampora LLP, 100 Jericho Quadrangle, Suite 300, Jericho, New York 11753, Attn: David J. Mahoney, Esq.; and (v) mailed to the Office of the United States Trustee, 560 Federal Plaza, Central Islip, New York 11722, no later than **5:00 p.m. on February 27, 2014.**

PLEASE TAKE FURTHER NOTICE, that the Hearing may be adjourned without further notice other than by announcement of such adjournment in open Court.

Dated: Jericho, New York
January 22, 2013

SILVERMANACAMPORA LLP
Counsel to Kenneth P. Silverman, Esq., the
Chapter 7 Trustee

By: s/ David J. Mahoney
David J. Mahoney
Member of the Firm
100 Jericho Quadrangle, Suite 300
Jericho, New York 11753
(516) 479-6300

EXHIBIT A

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

-----X
In re:

AGAPE WORLD, INC.,
AGAPE MERCHANT ADVANCE LLC,
AGAPE COMMUNITY LLC, AGAPE
CONSTRUCTION MANAGEMENT LLC,
AGAPE WORLD BRIDGES LLC, AND
114 PARKWAY DRIVE SOUTH LLC,

Debtors.

-----X
KENNETH P. SILVERMAN, ESQ., as
Chapter 7 Trustee of Agape World, Inc., *et al.*,

Plaintiff,

-against-

ERICA BALASA,

Defendant.

-----X
KENNETH P. SILVERMAN, ESQ., as
Chapter 7 Trustee of Agape World, Inc., *et al.*,

Plaintiff,

-against-

MICHAEL BURNS,

Defendant.

-----X

Chapter 7
Case No.: 09-70660 (DTE)
Substantively Consolidated

Adv. Pro. No.: 11-08213 (REG)

Adv. Pro. No.: 10-08888 (DTE)

**ORDER UNDER FEDERAL
RULE OF BANKRUPTCY PROCEDURE 9019(a) APPROVING
THE STIPULATION SETTLING THE TRUSTEE'S CLAIMS AGAINST ERICA
BALASA AND MICHAEL BURNS AND CLOSING THE ADVERSARY PROCEEDINGS**

Upon the Notice of Motion (the "Notice"), dated January 22, 2014, and related documents (collectively, the "Application") of Kenneth P. Silverman, Esq., the chapter 7 trustee (the "Trustee") of the substantively consolidated estate of Agape World, Inc., *et al.*, by his counsel, SilvermanAcampora LLP, seeking the entry of an Order approving the proposed

settlement of the Trustee's Claims against Erica Balasa ("Balasa") and Michael Burns¹ ("Burns" and along with Balasa, the "Defendants"), as memorialized in the Stipulation Settling the Trustee's Claims against Erica Balasa and Michael Burns (the "Stipulation"), and Closing the Adversary Proceedings (defined below); and no objections to the Motion or the proposed Order having been filed; and the Court having found that settling the Trustee's claims and judgment arising under 11 U.S.C. §§105, 502, 544, 548, 550 and 551, New York Debtor and Creditor Law §§273, 274, 275, 276 and 276-a, and New York common law, is reasonable and in the best interest of the Debtors' estate; and sufficient cause having been shown therefor; and after due deliberation and consideration; and it appearing that sufficient notice of the Motion and proposed Order has been given; and it appearing that good and sufficient cause exists for granting the Motion and proposed Order; and no additional notice being necessary or required:

NOW, THEREFORE, upon the Trustee's Notice and Motion and pursuant to Federal Rule of Bankruptcy Procedure 9019(a) and other applicable law, it is hereby

ORDERED, that service of the Notice and Motion and proposed Order, having been provided to: (i) the Office of the United States Trustee; (ii) Nicholas Cosmo, Debtors' former principal; (iii) Defendants; (iv) Defendants' counsel; (v) the Internal Revenue Service and other governmental agencies to the extent required by the Bankruptcy Rules and the Local Rules; and (vi) all parties having filed a Notice of Appearance in this case, and copies have been posted on the Trustee's website located at www.agapeworldbankruptcy.com complies with this Court's Order Establishing Noticing Procedures entered on July 8, 2009 and is otherwise sufficient; and it is further

ORDERED, that the Application is granted, and it is further

ORDERED, that the settlement of the Trustee's Claims against Defendants as memorialized in the Stipulation is approved; and it is further

¹ The Trustee is settling the adversary proceedings against Balasa and Burns together because Balasa and Burns are married.

ORDERED, that the Trustee be, and hereby is authorized and directed to take such steps, execute such documents and expend such funds as may be reasonably necessary to effectuate and implement the terms and conditions of this Order.

SO ORDERED:

EXHIBIT B

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

-----X
In re:

AGAPE WORLD, INC.,
AGAPE MERCHANT ADVANCE LLC,
AGAPE COMMUNITY LLC, AGAPE
CONSTRUCTION MANAGEMENT LLC,
AGAPE WORLD BRIDGES LLC, AND
114 PARKWAY DRIVE SOUTH LLC,

Debtors.

Chapter 7
Case No.: 09-70660 (DTE)
Substantively Consolidated

-----X
KENNETH P. SILVERMAN, ESQ., as
Chapter 7 Trustee of Agape World, Inc., *et al.*,

Plaintiff,

Adv. Pro. No.: 11-08213 (REG)

-against-

ERICA BALASA,

Defendant.

-----X
KENNETH P. SILVERMAN, ESQ., as
Chapter 7 Trustee of Agape World, Inc., *et al.*,

Plaintiff,

Adv. Pro. No.: 11-08888 (DTE)

-against-

MICHAEL BURNS,

Defendant.

-----X
**STIPULATION AND ORDER (I) SETTLING THE
TRUSTEE'S CLAIMS; AND (II) DIRECTING THE CLERK OF
THE COURT TO CLOSE CERTAIN ADVERSARY PROCEEDINGS**

I. On February 5, 2009 (the "Filing Date"), an involuntary chapter 7 petition was filed by four petitioning creditors (the "Petitioning Creditors") pursuant to 11 U.S.C. §303(b), against Agape World, Inc. ("AWI"), in the United States Bankruptcy Court for the Eastern District of New York.

II. On February 9, 2009, the Petitioning Creditors filed a motion to appoint an interim chapter 7 trustee under 11 U.S.C. §303(g).

III. On February 12, 2009, the Court granted the Petitioning Creditors' motion and entered an order directing the United States Trustee's Office to immediately appoint an interim chapter 7 trustee in the AWI case.

IV. On February 12, 2009, Kenneth P. Silverman, Esq., was appointed the interim trustee in the AWI case, and has since duly qualified and is now the permanent Trustee in the Debtors' substantively consolidated case.

V. On March 4, 2009, the Court issued an Order for relief in the AWI chapter 7 case.

VI. On April 14, 2009, the Court issued an Order substantively consolidating AWI, Agape Merchant Advance LLC, Agape Community LLC, Agape Construction Management, LLC, Agape World Bridges LLC, and 114 Parkway Drive South LLC (collectively, the "Debtors").

VII. The Trustee and his counsel have investigated the financial affairs of the Debtors, including a detailed analysis of the extent and validity of certain transfers made to Erica Balasa ("Balasa") and Michael Burns ("Burns" and together with Balasa, the "Defendants").

VIII. Thereafter, the Trustee commenced the adversary proceeding against Balasa, Adv. Pro. No. 11-08213 (REG) by the filing of a complaint, wherein the Trustee asserted that certain transfers totaling Eighty-Five Thousand Two Hundred Eighty-Nine and 00/100 (\$85,289.00) Dollars (the "Balasa Net Transfers") made to Balasa are recoverable pursuant to 11 U.S.C. §§105, 502, 544, 548, 550 and 551, New York Debtor and Creditor Law §§ 273, 274, 275, 276, 276-a, and New York common law.

IX. The Trustee further commenced the adversary proceeding against Burns, Adv. Pro. No. 11-08888 (DTE) by the filing of a complaint, wherein the Trustee asserted that certain transfers totaling Five Hundred Sixty-Two Thousand Seven Hundred Twelve and 50/100 (\$562,712.50) Dollars (the "Burns Net Transfers" and together with the Balasa Net Transfers,

the “Net Transfers”) made to Burns are recoverable pursuant to 11 U.S.C. §§105, 502, 544, 548, 550 and 551, New York Debtor and Creditor Law §§ 273, 274, 275, 276, 276-a, and New York common law. (The claims described in recital paragraphs VIII and IX are collectively referred to as the “Trustee’s Claims”).

X. Thereafter, Defendants retained their undersigned counsel to defend against the Trustee’s Claims.

XI. Pursuant to this Court’s Order, the parties attended a mediation session on September 16, 2013 at the United States Bankruptcy Court for the Eastern District of New York at Central Islip.

XII. In the spirit of compromise and without any admission of liability, Defendants have offered to remit Forty Thousand and 00/100 (\$40,000.00) Dollars (the “Settlement Sum”) to the Trustee in full and final settlement of the Trustee’s Claims.

XIII. Based upon the his review of all documentation related to the Net Transfers and his investigation of all attendant factors, the Trustee has, in his business judgment, agreed to settle the Trustee’s Claims upon the following terms and conditions, which the Trustee believes are fair and reasonable, especially in light of the costs and uncertainty associated with litigation.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the parties hereto, that the Trustee’s Claims be resolved upon the terms and conditions set forth herein as follows:

Defendants’ Obligation to Pay the Settlement Sum

1. This stipulation (the “Stipulation”) is subject to approval of the Bankruptcy Court pursuant to Fed. R. Bankr. P. 9019 (the “Approval Order”).

2. The Trustee has authorized Defendants to pay the Settlement Sum with five (5) installment payments (the “Monthly Payments”). The first Monthly Payment shall be payable to the Trustee in the amount of \$32,000.00 on September 30, 2013. The remaining four (4) Monthly Payments shall be payable to the Trustee in the amount of \$2,000.00 each on

November 30, 2013, January 31, 2014, March 31, 2014, and June 30, 2014. All Monthly Payments shall be remitted to "Kenneth P. Silverman, Esq., as Chapter 7 Trustee," by delivering a check to Trustee's counsel at SilvermanAcampora LLP, 100 Jericho Quadrangle, Suite 300, Jericho, New York, 11753, Attention: Christopher J. Rubino, Esq. Nothing contained herein shall preclude or penalize Defendants from pre-paying any Monthly Payment or portion of any Monthly Payment. As of the date of execution of this Stipulation, the Trustee has received the first two Monthly Payments, totaling \$34,000.00.

3. As additional consideration for settling the Trustee's Claims, Balasa agrees to waive Claim No. 3726 and Claim No. 5077. A copy of the Claim Waiver for Claim No. 3726 is attached as **Exhibit A**. A copy of the Claim Waiver for Claim No. 5077 is attached as **Exhibit B**.

4. If Defendants fail to make timely payment of the Settlement Sum in accordance with paragraph 2, above, or if Defendants' payment is dishonored for any reason whatsoever and Defendants do not cure such default within ten (10) business days after written notice sent by Federal Express or other reputable overnight courier to Defendants and Defendants' counsel at the addresses set forth herein, then the Trustee shall be entitled to move before the Bankruptcy Court, without further notice and upon the affidavit by the Trustee attesting to the default (a) for the entry of a judgment against Defendants for Three Hundred Three Thousand One and 50/100 (\$303,001.50) Dollars, plus costs, (less any sums previously paid as provided herein), and (b) for any further relief necessary to enforce his rights under this Stipulation.

5. Written notice of default shall be sent by Federal Express or other reputable overnight courier to:

Defendants at:

Erica Balasa and Michael Burns
106 Gideon Drive
Kenneth Square, PA 19348

Defendants' attorney at:

Scott L. Steinberg, Esq.
Lasky & Steinberg, P.C.
595 Stewart Avenue, Suite 410

6. Any portion of the Settlement Sum received prior to the Approval Order's entry shall be held in the Trustee's segregated "Earnest Money" account until the Approval Order becomes final and non-appealable under 28 U.S.C. §158(c)(2) and Bankruptcy Rule 8002.

7. Upon the Approval Order becoming final and non-appealable, (which is the 14th day after the Approval Order's entry), the Trustee's counsel will transfer all portions of the Settlement Sum being held in the segregated "Earnest Money" account to the Debtors' estate account. If the Bankruptcy Court denies the entry of the Approval Order, the Trustee shall return any portion of the Settlement Sum being held in the segregated "Earnest Money" Account, without interest, to Defendants' or their counsel without undue delay.

8. If the Court does not enter the Approval Order, this Stipulation will be null and void and none of the terms herein shall be usable as evidence by either party.

Releases

9. Upon the Approval Order becoming final and non-appealable, and the Trustee's receipt and clearance of each installment of the Settlement Sum, the Trustee and the estate release and forever discharge Defendants from any and all claims, claims for relief, demands, costs, expenses, damages, liabilities, and obligations of any nature arising out of or relating to the Trustee's Claims.

10. Upon the Approval Order becoming final and non-appealable, Defendants release, discharge, and waive any and all claims against the Debtor's estate, the Trustee and the Trustee's agents, attorneys, assigns and successors-in-interest from any and all claims, proofs of claim, claims for relief, demands, costs, expenses, damages, liabilities, and obligations of any nature.

No Admission

11. It is understood and agreed that this Stipulation is entered into to avoid costly and protracted litigation. Neither the execution of this Stipulation, nor the payment of the Settlement Sum shall be construed as an admission on Defendants' part. For clarification, this paragraph is not intended and shall not be deemed to affect Defendants' obligation to make timely payment of the Settlement Sum or adversely affect the Trustee's rights and remedies if Defendants fail to make timely payment of the Settlement Sum.

Miscellaneous

12. This Stipulation may be executed in one or more counterparts, with each part being deemed a part of the original document, and facsimile or other electronic signatures shall be deemed an original signature.

13. The person executing this Stipulation on behalf of each respective party warrants and represents that she or he is authorized and empowered to execute and deliver this Stipulation on behalf of such party.

14. This Stipulation may not be altered, modified, or changed unless in writing, signed by the parties or their counsel.

15. The Bankruptcy Court shall retain exclusive jurisdiction over the subject matter of this Stipulation, including but not limited to its enforcement and the implementation and interpretation of its terms and conditions.

16. This Stipulation shall be governed by the laws of the State of New York, except with respect to matters as to which federal law is applicable without regard to any conflicts of law principles.

17. The Trustee and Defendants are each responsible for their own costs and attorneys' fees incurred in connection with this proceeding.

18. Upon the entry of this Stipulation as an Approval Order in this proceeding, the Clerk of the Court is directed to close this adversary proceeding.

Dated: Jericho, New York
December __, 2013

SILVERMANACAMPORA LLP
Attorneys for Kenneth P. Silverman, Esq.,
The Chapter 7 Trustee

By: s/David J. Mahoney
David J. Mahoney, Esq.
Member of the Firm
100 Jericho Quadrangle, Suite 300
Jericho, New York 11753
(516) 479-6300

Dated: Garden City, New York
December 16, 2013

Attorney for Defendants

By: s/Scott L. Steinberg
Scott L. Steinberg, Esq.
Lasky & Steinberg, P.C.
595 Stewart Avenue, Suite 410
Garden City, New York 11530

Dated: Kennett Square, Pennsylvania
December 13, 2013

Defendant

By: s/Erica Balasa
Erica Balasa

Dated: Kennett Square, Pennsylvania
December 13, 2013

Defendant

By: s/Michael Burns
Michael Burns

EXHIBIT A

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

-----X
In re:

AGAPE WORLD, INC.,
AGAPE MERCHANT ADVANCE LLC,
AGAPE COMMUNITY LLC, AGAPE
CONSTRUCTION MANAGEMENT LLC,
AGAPE WORLD BRIDGES LLC, AND
114 PARKWAY DRIVE SOUTH LLC,

Debtors.
-----X

Chapter 7
Case No.: 09-70660 (DTE)
Substantively Consolidated

**NOTICE OF WAIVER AND WITHDRAWAL WITH PREJUDICE OF CLAIM
NUMBER 3726, IN THE AMOUNT OF \$113,423.00, FILED BY ERICA BALASA**

Erica Balasa hereby waives and withdraws, with prejudice, Claim Number 3726, filed on June 12, 2009, in the amount of \$113,423.00 and any subsequent amendments thereto. SilvermanAcampora LLP, counsel to Kenneth P. Silverman, Esq., the Chapter 7 Trustee of the substantively consolidated cases of Agape World, Inc., *et al.*, is authorized to file this Notice with the Bankruptcy Court to effect the withdrawal of Claim number 3726 with prejudice. A copy of Claim number 3726 is attached hereto.

Dated: ~~November~~ 17, 2013
December

By: s/Erica Balasa
Erica Balasa

Address: 106 Gideon Drive
Kennett Square, PA 19348

01000346



UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF NEW YORK	PROOF OF CLAIM CHAPTER 7
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Name of Debtor Agape World Inc	Case Number 09-70660 (DTE)
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NOTE: This form should not be used to make a claim for an administrative expense arising after the commencement of the case but may be used for purposes of asserting a claim under 11 U.S.C. 503(b)(9) (see Column #5). A request for payment of an administrative expense may be filed pursuant to 11 U.S.C. § 503.

Name of Creditor (the person or other entity to whom the debtor owes money or property) Erica Balasa	<input type="checkbox"/> Check this box to indicate that this claim amends a previously filed claim Court Claim Number _____ (If known) Filed on _____
Name and address where notices should be sent BALASA, ERICA 88 VINTON ST LONG BEACH, NY 11561	
Telephone number _____ Name and address where payment should be sent (if different from above) _____ Telephone number _____	

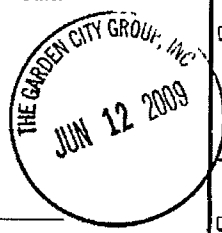
FILED - 03726
USBC - EASTERN DISTRICT OF NEW YORK
AGAPE WORLD INC.
09-70660 (DTE)

1 Amount of Claim as of Date Case Filed. \$ <u>113,423.00</u> If all or part of your claim is secured, complete item 4 below, however, if all of your claim is unsecured, do not complete item 4. If all or part of your claim is entitled to priority, complete item 5. <input type="checkbox"/> Check this box if claim includes interest or other charges in addition to the principal amount of claim. Attach itemized statement of interest or charges.	<input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars. <input type="checkbox"/> Check this box if you are the debtor or trustee in this case.
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2 Basis for Claim: <u>INVESTMENT - See attached</u> (See instruction #2 on reverse side)	5 Amount of Claim Entitled to Priority under 11 U.S.C. §507(a). If any portion of your claim falls in one of the following categories, check the box and state the amount. Specify the priority of the claim:
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3 Last four digits of any number by which creditor identifies debtor. <u>7003</u> 3a Debtor may have scheduled account as: _____ (See instruction #3a on reverse side)	<input type="checkbox"/> Domestic support obligations under 11 U.S.C. §507(a)(1)(A) or (a)(1)(B) <input type="checkbox"/> Unsecured claims allowed under § 502(f) (§507 (a)(1)(A)(3)) <input type="checkbox"/> Wages, salaries, or commissions (up to \$10,950*) earned within 180 days before filing of the bankruptcy petition or cessation of the debtor's business, whichever is earlier - 11 U.S.C. §507 (a)(4) <input type="checkbox"/> Contributions to an employee benefit plan - 11 U.S.C. §507 (a)(5) <input type="checkbox"/> Up to \$2,425* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use - 11 U.S.C. §507 (a)(7) <input type="checkbox"/> Taxes or penalties owed to governmental units - 11 U.S.C. §507 (a)(8) <input type="checkbox"/> Value of goods received by the Debtor within 20 days before the date of commencement of the case - 11 U.S.C. § 503(b)(9) (§507(a)(2)) <input type="checkbox"/> Other - Specify applicable paragraph of 11 U.S.C. §507 (a)(____) Amount entitled to priority \$ _____
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4 Secured Claim (See instruction #4 on reverse side) Check the appropriate box if your claim is secured by a lien on property or a right of setoff and provide the requested information. Nature of property or right of setoff <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other Describe: _____ Value of Property \$ _____ Annual Interest Rate _____ % Amount of arrearage and other charges as of time case filed included in secured claim, if any \$ _____ Basis for perfection: _____ Amount of Secured Claim \$ _____ Amount Unsecured \$ _____	*Amounts are subject to adjustment on 4/1/10 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment.
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6 Credits. The amount of all payments on this claim has been credited for the purpose of making this proof of claim. 7. Documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements or running accounts, contracts, judgments, mortgages, and security agreements. You may also attach a summary. Attach redacted copies of documents providing evidence of perfection of a security interest. You may also attach a summary (See definition of "redacted" on reverse side). DO NOT SEND ORIGINAL DOCUMENTS ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING If the documents are not available, please explain _____	Amount entitled to priority \$ _____
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Date <u>6/6/09</u> Signature The person filing this claim must sign it. Sign and print name and title, if any, of the creditor or other person authorized to file this claim and state address and telephone number if different from the notice address above. Attach copy of power of attorney, if any. Erica Balasa <i>Erica Balasa</i>	FOR COURT USE ONLY
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EXHIBIT B

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

-----X
In re:

AGAPE WORLD, INC.,
AGAPE MERCHANT ADVANCE LLC,
AGAPE COMMUNITY LLC, AGAPE
CONSTRUCTION MANAGEMENT LLC,
AGAPE WORLD BRIDGES LLC, AND
114 PARKWAY DRIVE SOUTH LLC,

Debtors.
-----X

Chapter 7
Case No.: 09-70660 (DTE)
Substantively Consolidated

**NOTICE OF WAIVER AND WITHDRAWAL WITH PREJUDICE OF CLAIM
NUMBER 5077, IN THE AMOUNT OF \$113,423.00, FILED BY ERICA BALASA**

Erica Balasa hereby waives and withdraws, with prejudice, Claim Number 5077, filed on May 30, 2010, in the amount of \$113,423.00 and any subsequent amendments thereto. SilvermanAcampora LLP, counsel to Kenneth P. Silverman, Esq., the Chapter 7 Trustee of the substantively consolidated cases of Agape World, Inc., *et al.*, is authorized to file this Notice with the Bankruptcy Court to effect the withdrawal of Claim number 5077 with prejudice. A copy of Claim number 5077 is attached hereto.

Dated: ~~November~~ 13, 2013
December

By: s/Erica Balasa
Erica Balasa

Address: 106 Gideon Drive
Kennett Square, PA 19348

1000346

UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF NEW YORK	PROOF OF CLAIM CHAPTER 7
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Name of Debtor Agape World Inc	Case Number 09-70660 (DTE)
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NOTE: This form should not be used to make a claim for an administrative expense arising after the commencement of the case, but may be used for purposes of asserting a claim under 11 U.S.C. § 507(b)(9) (see Column #3). A request for payment of an administrative expense may be filed pursuant to 11 U.S.C. § 503.

Name of Creditor (the person or other entity in whom the debtor owes money or property). Erica Balasa	<input type="checkbox"/> Check this box to indicate that this claim amends a previously filed claim
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Name and address where notices should be sent BALASA, ERICA 88 VINTON ST LONG BEACH, NY 11561	Court Claim Number _____ (if known)
Telephone number _____	Filed on _____

Name and address where payment should be sent (if different from above) FILED - 05077 USBC - EASTERN DISTRICT OF NEW YORK AGAPE WORLD INC. 09-70660 (DTE)	<input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars
Telephone number _____	<input type="checkbox"/> Check this box if you are the debtor or trustee in this case

1. Amount of Claim as of Date Case Filed \$ 113,423.00 If all or part of your claim is secured, complete item 4 below, however, if all of your claim is unsecured, do not complete item 4 If all or part of your claim is entitled to priority, complete item 5	5. Amount of Claim Entitled to Priority under 11 U.S.C. §507(a) If any portion of your claim falls in one of the following categories, check the box and state the amount.
<input type="checkbox"/> Check this box if claim includes interest or other charges in addition to the principal amount of claim. Attach itemized statement of interest or charges	Specify the priority of the claim

2. Basis for Claim (see instruction #2 on reverse side) PAID BY ASSETS attached	<input type="checkbox"/> Domestic support obligations under 11 U.S.C. §507(a)(1)(A) or (a)(1)(B)
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3. Last four digits of any number by which creditor identifies debtor 7003	<input type="checkbox"/> Unsecured claims allowed under § 502(f) (§507 (a)(1)(A)(3))
3a Debtor may have scheduled account as _____ (see instruction #3 on reverse side)	<input type="checkbox"/> Wages, salaries, or commissions (up to \$10,950* earned within 180 days before filing of the bankruptcy petition or cessation of the debtor's business, whichever is earlier - 11 U.S.C. §507 (a)(4)

4. Secured Claim (see instruction #4 on reverse side) Check the appropriate box if your claim is secured by a lien on property or a right of setoff and provide the requested information Nature of property or right of setoff. <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other Describe _____ Value of Property \$ _____ Annual Interest Rate % _____ Amount of mortgage and other charges as of time case filed included in secured claim, _____ If any \$ _____ Basis for perfection: _____ Amount of Secured Claim \$ _____ Amount Unsecured \$ _____	<input type="checkbox"/> Contributions to an employee benefit plan - 11 U.S.C. §507 (a)(5) <input type="checkbox"/> Up to \$2,425* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use - 11 U.S.C. §507 (a)(7) <input type="checkbox"/> Taxes or penalties owed to governmental units - 11 U.S.C. §507 (a)(8) <input type="checkbox"/> Value of goods received by the Debtor within 20 days before the date of commencement of the case - 11 U.S.C. § 503(b)(9) (§507(a)(2)) <input type="checkbox"/> Other - Specify applicable paragraph of 11 U.S.C. §507 (a)() Amount entitled to priority \$ _____
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6. Credits - the amount of all payments on this claim has been credited for the purpose of making this proof of claim	<small>*Amounts are subject to adjustment on 4/1/10 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment</small>
7. Documents - Attach reduced copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements or running accounts, contracts, judgments, mortgages, and security agreements. You may also attach a summary. Attach reduced copies of documents providing evidence of perfection of a security interest. You may also attach a summary. (See definition of "reduced" on reverse side)	
DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING.	
If the documents are not available, please explain _____	

Date 6/6/09 Signature: The person filing this claim must sign it. Sign and print name and title, if any, of the creditor or other person authorized to file this claim and state address and telephone number if different from the notice address above. Attach copy of power of attorney, if any. Erica Balasa Erica Balasa	FOR COURT USE ONLY THE GARDEN CITY U.S. BANK MAR 30 2010
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