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1 2 3 4	PROBER & RAPHAEL, A LAW CORPORATION LEE S. RAPHAEL, ESQUIRE, #180030 CASSANDRA J. RICHEY, ESQUIRE #155721 DAVID F. MAKKABI, ESQUIRE #249825 MELISSA VERMILLION, ESQUIRE #241354 WILLIAM K. HONG, ESQUIRE #266690 20750 Ventura Boulevard, Suite 100 Woodland Hills, California 91364 P.O. Box 4365 Woodland Hills, CA 91365-4365 (818) 227-0100 (818) 227-0101 facsimile C.094-3878A Attorneys for Responding Secured Creditor	
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9	UNITED STATES BANKRUPTCY COURT	
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11	EASTERN DISTRICT OF CALIFORNIA	
12	In re	) Bk. No. 10-21656-E-11
13	RICKIE WALKER dba RICK'S JANITORIAL,	) Chapter 11
14 15	Debtor.	) ) PPR-1 )
16 17	RESPONSE TO DEBTOR'S OBJECTION TO CLAIMS OF BAC HOME LOANS SERVICING, L.P.	
18	BAC Home Loans Servicing, L.P., its assignees and/or successors in interest,	
19	secured creditor in the above-entitled Bankruptcy proceeding, hereby submits the following	
20	response to Debtor's Objection to the Claims of BAC Home Loans Servicing, L.P.:	
21	Bankruptcy Rule 3001(d) states: "Evidence of perfection of security interest. If a	
22	security interest in property of the debtor is claimed, the proof of claim shall be accompanied by	
23	evidence that the security interest has been perfected." U.S.C.S. Bankruptcy R 3001.	
24	First, Secured Creditor has attached evidence to the Notice of Security Interest of	
25	Rents and Profit that the security interest has been perfected as Exhibit A, i.e. the Note and Deed	
26	of Trust.	
27	In addition, although the Debtor star	tes, "The proof of claim does not set forth the
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creditor's claim with proper specificity, pursuant to F.R.B.P. Rule 3001(a) & (c)," Secured Creditor has yet to file a proof of claim and it is premature for any proof of claim to be objected to, "amended," or "disallowed". Rather, a Proof of Claim is currently being reviewed for accuracy purposes and shall be filed shortly. WHEREFORE, Secured Creditor respectfully requests that Debtor's Objection to Claim of BAC Home Loans Servicing, L.P. be denied. Dated: April 22, 2010 Prober & Raphael, A Law Corporation By /s/ Cassandra J. Richey, Esq. Attorneys for Secured Creditor 20750 Ventura Boulevard, Suite 100 Woodland Hills, California 91364 (818) 227-0100 C.094-3878A Response to Debtor's Objection to Claims