

[Your Name/Law Firm Name]

[Address]

[City, State, Zip Code]

[Email]

[Phone Number]

[Date]

[Trustee Name/Plaintiff Counsel Name]

[Address]

[City, State, Zip Code]

**RE: [Debtor Name] - Preference Claim Demand**

**Case No: [Case Number]**

**Adversary Proceeding No: [Adversary Number, if applicable]**

Dear [Name],

We represent [Creditor Name] ("Creditor") in connection with your demand for the return of alleged preferential transfers in the amount of \$[Amount] made by [Debtor Name] ("Debtor") during the 90-day period preceding the bankruptcy filing.

Based on our review of the payment history between the parties, it is our opinion that the challenged transfers are protected from avoidance under 11 U.S.C. § 547(c)(2), commonly known as the "Ordinary Course of Business" defense.

Specifically, the transfers satisfy the statutory requirements as follows:

1. **Subjective Ordinary Course (11 U.S.C. § 547(c)(2)(A)):** The transfers were made in payment of debts incurred by the Debtor in the ordinary course of business between the Debtor and the Creditor. The timing, method of payment, and collection efforts during the preference period were consistent with the historical dealings between the parties established over the [Number] months/years prior to the preference period.
2. **Objective Ordinary Course (11 U.S.C. § 547(c)(2)(B)):** The transfers were made according to ordinary business terms prevalent in the [Specify Industry] industry. The payment terms and behavior align with standard industry practices for similar transactions.

Attached is a summary of the payment history comparing the "Pre-Preference Period" with the "Preference Period." The data demonstrates that there was no significant deviation in the weighted average days to pay or the manner of payment that would suggest the Creditor received preferential treatment.

In light of the evidence supporting this affirmative defense, we request that you withdraw your demand and close your file regarding this matter. If you intend to pursue this claim further, please provide any specific evidence you believe rebuts this ordinary course defense.

Sincerely,

[Signature]

[Your Printed Name]