

**In re USA Labs, Inc. and Cosmyl, Inc.**  
Case No. 04-41587-BKC-RAM  
Chapter 11

Administrative expense claims are not subject to §502(d). The structure of §502 indicates that the only claims to which subsection (d) applies to are prepetition claims or those post-petition claims, such as rejection claims or contribution claims, which are treated like prepetition claims in §502(e) through §502(i) and are expressly subject to §502(d). Moreover, the policy considerations underlying the reason for administrative expenses and their corresponding priority in the context of a bankruptcy case, further compel a finding that §502(d) does not act as a bar.