# IT IS ORDERED as set forth below:

SUBSTRICT OF ORDER

**Date: January 17, 2024** 

Edward J. Coleman, III Chief United States Bankruptcy Court Judge

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF GEORGIA SAVANNAH DIVISION

In Re: \$ Case No.: 23-40569-EJC \$ (Chapter 7) \$ Debtor \$

# ORDER FOR EXAMINATION AND PRODUCTION OF DOCUMENTS PURSUANT TO BANKRUPTCY RULE 2004

Upon the motion filed by the Trustee pursuant to Bankruptcy Rule 2004,

IT IS HEREBY ORDERED that Judith Hirsch shall produce to the Trustee the documents listed in Appendix A on or before February 16, 2024 or as otherwise agreed upon by the parties; and

IT IS FURTHER ORDERED that Judith Hirsch shall appear for examination under oath at the Office of the United States Trustee, 33 Bull Street, Suite 400, Savannah, GA 31401, on **February 28, 2024 at 10:00 AM**, or as otherwise agreed upon by the parties.

## END OF DOCUMENT

# Prepared by:

/s/ Tiffany E. Caron
TIFFANY E. CARON, ESQ.
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CHAPTER 7 TRUSTEE
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## **APPENDIX "A"**

# Definitions

- A. As used herein, the term "Document" is intended to have the broadest permissible meaning under the Federal Rules of Civil Procedure and shall mean any written, printed, recorded, taped, electromagnetically recorded or encoded, electronically stored, graphic or other matter of every type and description that is or has been in the possession, custody, or control of you or any of your agents and attorneys, or of which you have knowledge, and shall include without limitation, the following: letters, correspondence, affidavits, declarations, statements, books, articles, reprints, resolutions, minutes, communications, messages, e-mails, electronic communications, electronically stored information, notes, loan documents, collateral documents, stenographic or handwritten notes, memoranda, diaries, contracts, subcontracts, bids, worksheets, drafts, agreements, records, resumes, invoices, receipts, bills, cancelled checks, financial statements, audit reports, tax returns, calendars, schedules, summaries, studies, calculations, estimates, diagrams, sketches, drawings, plans, photographs, tapes, videotapes, movies, recordings, transcriptions, work orders, computer print-outs, computer disks, data processing cards, data storage cards, and the like; and where originals of such documents are not available or are not in your possession, custody or control, every copy of every such document; and every copy of every such document where such copy is not an identical copy of the original or where such copy contains any commentary or notation whatsoever which does not appear on the original.
- B. As used herein, the term "Debtor" or "MLG" shall refer to Master Lending Group, LLC.
- C. As used herein, the term "Petition Date" shall refer to July 6, 2023.

# **Document and Information Request**

#### **Financials:**

# For the period of January 1, 2016 to January 15, 2023:

- (1) all bank statements, deposit slips, canceled checks, and signature cards for any account over which Judith Hirsch has or had signatory authority (including but not limited to Wells Fargo Accounts ending 7761, 1316 and 3586, including investment accounts (including, but not limited to, Raymond James and Coinbase);
- (2) all credit card statements for accounts on which Judith Hirsch was an authorized user; and
- (3) any personal financial statements or loan applications submitted by Judith Hirsch.

## Tax Returns:

Federal and State Income Tax Returns whether filed as Married Filing Jointly or Married Filing Separately for the years of 2014 to 2021 for Judith Hirsch.

#### Life Insurance:

# For the period of January 1, 2021 to January 15, 2024:

A list of all life insurance policies insured on the life of Gregory M. Hirsch on which Judith Hirsch is a named beneficiary, including: Name of Insurance Company, Policy Number, Amount of Death Benefit, and Status of Proceeds.

A list of all life insurance policies on the life of Gregory M. Hirsch with premiums paid by Judith Hirsch including: Name of Insurance Company, Policy Number, Amount of Death Benefit, and Status of Proceeds.

Copies of the Sale Agreements with Trelog, Inc. for the sale of New York Life Insurance Policies with Death Benefits of:

- \$7,000,000 New York Life Sold to Trelog, Inc. for approximately \$3,575,000 on or around February 10, 2023;
- \$5,000,000 New York Life Sold to Trelog, Inc. for approximately \$2,500,000 on or around February 14, 2023; and
- \$2,500,000 New York Life Sold to Trelog, Inc. for approximately \$1,375,000 on or around February 14, 2023.

# 7 18th Street, Tybee Island, Georgia 31328 (the "Property"):

Any and all documents related to the real estate transactions involving the Property for the period of January 1, 2017 to January 15, 2024.