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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

In re:

POWER BLOCK COIN, L.L.C.

Debtor

Case No. 24-bk-23041

Chapter 11

Judge Cathleen D. Parker

MOTION FOR DERIVATIVE STANDING

The Official Committee of Unsecured Creditors (the “Committee”) of the Debtor Power Block Coin, L.L.C. (the “Debtor”), by and through counsel, files this motion (“Motion”)¹ seeking an expedited order from the Court authorizing the Committee to pursue various derivative claims and insider transactions on behalf of the Debtor’s estate (the “Estate”). In support hereof, the Committee respectfully states as follows:

I. INTRODUCTION

The Committee moves for entry of an order authorizing the Committee to commence and pursue, on behalf of the Estate, claims against the Debtor’s insiders and affiliates, including, but

¹ Along with this Motion, the Committee has also filed a motion seeking to shorten time and expedite hearing on this Motion.

not limited to, actions to avoid and recover fraudulent and preferential transfers to the Debtor's affiliates and to pursue all related relief (the "Derivative Actions"). The Committee brings this Motion not as a substitute for its pending Motions to Approve Disclosure Statement [Doc. No. [277](#)] and for Appointment of a Chapter 11 Trustee [Doc. No. [413](#)] (the "Trustee Motion"), but as a further effort to ensure that the only significant assets of this bankruptcy estate—the tens of millions of dollars of avoidance and other claims against insiders and affiliates of the Debtor and other persons and entities aligned with its principal, Aaron Tilton—are not irretrievably lost to the existing two-year statute of limitation under Section 546(a) that will run in June 2026. The record in this case demonstrates pervasive conflicts, gross mismanagement, and a persistent failure and refusal by the Debtor to pursue valuable insider claims, all while the statute of limitations deadline on key avoidance and other actions approaches. Immediate grant of derivative standing to the Committee is necessary to preserve and maximize Estate value.

Ultimately, however, this Motion is only a partial solution to a larger problem. While the Committee could preserve certain of the most obvious claims if granted derivative standing as sought here, only the appointment of a trustee, complete access to the records of the Debtor, and resulting extension of the limitations period for an additional year under Section 546(a) will afford the reasonable additional period necessary to preserve, formulate, and pursue the many claims that the Debtor has failed to disclose.

II. JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of Utah (the "Court") has jurisdiction over this Motion pursuant to [28 U.S.C. § 1334](#).
2. This matter is a core proceeding within the meaning of [28 U.S.C. § 157\(b\)\(2\)](#).

3. Venue is proper in this district pursuant to [28 U.S.C. §§ 1408](#) and [1409](#).

III. RELIEF SOUGHT AND GROUNDS FOR RELIEF

4. Pursuant to Bankruptcy Code Section [503\(b\)\(3\)\(B\)](#) and Section [1103\(c\)\(5\)](#), as well as other relevant sections of the Bankruptcy Code, the Committee seeks authorization, on behalf of the Estate, to investigate, commence, prosecute, and/or settle the Derivative Actions against the Debtor’s insiders and affiliates, including, without limitation, Blue Castle Holdings, Inc., SmartFi Lending, Solara Communities, LLC, and related entities and persons, together with all mediate and immediate transferees, and to seek all available related relief.

IV. STATEMENT OF FACTS

A. History of the Case

5. On June 20, 2024 (the “Petition Date”), the Debtor commenced this case by filing for bankruptcy under Chapter 11 of the Bankruptcy Code, improperly electing to proceed under Subchapter V despite the existence of claims against it in excess of \$192 million.² [Doc. No. [1](#)].

6. On October 9, 2024, the Court sustained objections to the Debtor’s election to proceed under Subchapter V, thus rendering this case a traditional Chapter 11 proceeding. [Doc. No. [190](#)].

7. On October 24, 2024, the U.S. Trustee appointed the Committee to serve as the Official Committee of Unsecured Creditors for the Debtor. [Doc. No. [199](#)].

8. On September 18, 2024, the Debtor filed a Plan of Reorganization under Chapter 11, Subchapter V. [Doc. No. [184](#), amended at Doc. No. [185](#)].

² A filing by the Debtor states that “the total value of claims . . . asserted” in this case is \$192,521,332.36. [Doc. No. [350](#)] at 5.

9. On November 18, 2024, the Debtor filed a motion to extend the exclusivity period for it to file and solicit support for a plan. [Doc. No. [213](#)].

10. On December 11, 2024, the Committee filed an objection to the Debtor's exclusivity motion. [Doc. No. [237](#)].

11. On December 17, 2024, at the hearing on the Debtor's motion to extend exclusivity, the Honorable Judge Marker denied the Debtor's motion, largely because of the Debtor's failure to disclose or address ongoing litigation involving the Solara Property (a piece of real property purchased with a loan from the Debtor made to one of its affiliates) and the \$2 million lien placed on the Solara Property, as well as Mr. Tilton acting on both sides of the Solara transaction. [Doc. No. [243](#)]. In connection with this ruling and these issues, the Court further noted that "the Debtor has not shown that it has the ability to operate this estate in a way that's beneficial to creditors with transparency and good faith." [Doc. No. [243](#)], audio file at 21:45.

12. On December 16, 2024, the Debtor filed its First Amended Plan of Reorganization. [Doc. No. [242](#)].

13. On January 30, 2025, the Committee filed its own plan [Doc. No. [254](#)], followed by an amended version of that plan on March 7, 2025 [Doc. No. [273](#), [274](#)]. This plan provides for the establishment of a liquidating trust and a liquidating trustee who is vested with all estate causes of action, including all claims against insiders and affiliates.

14. On June 27, 2025, the Debtor, Blue Castle, the Committee, and other affiliates of the Debtor engaged in mediation before the Honorable Judge Peggy Hunt to see if the parties could negotiate terms for a consensual joint plan. While the parties reached tentative agreement on some, but not all, of the issues, the parties later came to an impasse on many key points.

15. On March 14, 2025, the Committee filed a motion seeking an order (i) approving the adequacy of its disclosure statement, (ii) approving solicitation and notice procedures for confirmation of the Committee’s plan, (iii) approving ballot and notice forms in connection therewith, (iv) scheduling certain dates with respect thereto, and (v) granting related relief. [Doc. No. [277](#)]. This motion was heard by the Court on November 18, 2025, and remains under advisement.

B. Insider Transactions and Claims

14. Numerous insider and accounting issues exist in this case, beginning with the unorthodox first-day “Cash Management Motion” in which the Debtor asked the Court to allow the Debtor (which had allegedly become unbanked in late 2023) to pay its operating expenses through a so-called Services Agreement with Blue Castle, a related entity that, like the Debtor, is controlled by Aaron Tilton. [Doc. No. [7](#)]. Under the Services Agreement, Blue Castle uses money from its bank accounts to pay for the Debtor’s obligations. In exchange, the Debtor either transfers cryptocurrency to Blue Castle or “applies a credit against the balances of the Blue Castle Loan, a loan it has made to Blue Castle.” *Id.* at 3.

15. The Debtor made the Blue Castle Loan on August 8, 2023, in the principal amount of \$1,400,000.00 with a maturity date of August 6, 2028, and an APR of 4%— below market rates and on below market terms. [Doc. No. [242](#)] at 7, 22. Upon information and belief, the Blue Castle Loan was funded from the money of investors on the Debtor’s cryptocurrency platform.

16. Various irregularities and accounting issues exist with this Blue Castle Note and the Cash Management Motion, as further set forth in the Committee’s Trustee Motion. [Doc. No. [413](#)] at 4–6.

17. Additionally, as noted in the Debtor’s own plan (which is now off the table), the Blue Castle Note is only one of “three notes receivable made by [the Debtor’s] affiliates”—Solara, Blue Castle, and SmartFi Lending—which notes constitute the Debtor’s primary assets (the “Affiliate Notes”). [Doc. No. [242](#)] at 22. *All of these Notes arise from pre-petition insider transfers of the Debtor’s funds* (the “Affiliate Loans”). These Affiliate Loans were “made at favorable interest rates to the Debtor’s affiliates” and are “unsecured obligations with no payments due until their respective maturity dates” that do not come due until August 2028, September 2028, and March 2032, respectively. *Id.* SmartFi Lending, Solara Communities, LLC, and Blue Castle (the “Affiliates”) are all affiliates of the Debtor and are controlled, to one extent or another, by Mr. Tilton. Mr. Tilton is an officer and director of Blue Castle Holdings, Inc., and the Debtor, SmartFi Lending, and Solara Communities LLC are all sub-entities of Blue Castle. *See* [Doc. No. [237](#)] at 6.

18. The Committee has raised these insider notes and Affiliate Loans with the Debtor multiple times and has asserted that the Debtor should bring claims related to these notes and loans.

19. However, the Debtor has stated that “pursuing those [Affiliate Loans] as Avoidance Actions would be costly and risky,” and therefore, has declined to pursue them. *See* [Doc. No. [242](#)] at 27. Thus, absent the appointment of a trustee or a grant of derivative standing to the Committee, these valuable causes of action will not be pursued.

20. The entanglement of the Debtor, the Affiliates, and Mr. Tilton has led to a variety of other issues, including claims of improper joint defense agreements between Tilton and the Debtor, accounting issues in the Debtor’s MORs, commingling of Estate cryptocurrency assets with customer assets, the undisclosed recovery of assets from a Canadian proceeding that were

used to pay the Debtor's legal fees, and more. These issues are more fully set forth in the Committee's Trustee Motion. *See* Trustee Motion at 8, 10–11, 12.

21. For obvious reasons, under the control of Mr. Tilton, the Debtor has had and will continue to have blatant conflicts of interest, and accordingly, no interest or incentive to investigate, much less pursue, any of these insider or affiliate claims, which have languished and remain unasserted as the two-year statute of limitations to commence actions on such claims runs toward lapse on June 20, 2026.

C. The Trustee Motion and the Conversion Motion

22. On October 21, 2025, the Committee filed the Trustee Motion. In the Trustee Motion, the Committee highlighted the rapidly approaching Section 546(a) statute of limitations deadline for avoidance actions, which is set to run on June 20, 2026. *See* Trustee Motion at 20.

23. On November 7, 2025, the Debtor responded by filing a motion to convert the case to Chapter 7 (the "Conversion Motion"). [Doc. No. [422](#)].

24. On November 14, 2025, the Committee filed an objection to the Debtor's Conversion Motion, and in that objection, cited to how the interplay of the Trustee Motion and the Conversion Motion triggered the provisions of Section 1112(b). *See* [Doc. No. [433](#)] at 6–7.

25. Based on the Trustee Motion, the Conversion Motion, and their interplay, the Committee relied on the statutory requirement in Section 1112(b)(3) in its assumption that such motions would be heard "not later than 30 days after the filing of the motion" and decided "not later than 15 days after the commencement of such hearing."

26. On November 18, 2025, the Court held a timely hearing on the two motions, as well as the Committee's motion to approve its disclosure statement under its plan. The Court took the matters under advisement.

27. On December 11, 2025, the U.S. Trustee filed a motion seeking disgorgement of the fees paid to the Debtor's counsel based on evidence of Debtor's counsel's failure to disclose the source of payment of attorney fees and failure to disclose a connection and potential conflict in their representation of the Debtor. [Doc. No. [448](#)].

28. While the Bankruptcy Code sets an expedited deadline for disposition of motions filed under Section [1112\(b\)\(3\)](#), there has not yet been a decision on the Committee's Trustee Motion or on the Conversion Motion.

V. ARGUMENT

A. Legal Standard

29. Courts have granted derivative standing to official committees to pursue estate claims under a variety of Bankruptcy Code sections, including Section [503\(b\)\(3\)\(B\)](#) (authorizing payment of administrative expense for "creditor that recovers, after the court's approval, for the benefit of the estate any property transferred or concealed by the debtor"); Section [1103\(c\)\(5\)](#) (authorizing committee to "perform such other services as are in the interest of those represented"); Section [1107\(a\)](#) (granting a debtor in possession the rights of a trustee); and Section [1109\(b\)](#) (granting parties in interest the right to raise, appear, and be heard on any issue in a case under chapter 11). *See In re Roman Cath. Church of Archdiocese of Santa Fe*, [621 B.R. 502, 507](#) (Bankr. D.N.M. 2020).

30. While the Tenth Circuit has not directly addressed the question of committee derivative standing, it has noted that other courts have “permitted creditors’ committees to bring actions *in the name of the debtor*,” so long as they are “in connection with actions against insiders or other persons that the debtor in possession has refused or is reluctant to sue.” *In re MS55, Inc.*, [477 F.3d 1131, 1139](#) (10th Cir. 2007) (*citing* Collier on Bankruptcy ¶ 1103.05[6][a]).³

31. Multiple courts within the Tenth Circuit have authorized derivative standing for committees and creditors. *See In re Roman Cath. Church of Archdiocese of Santa Fe*, [621 B.R. at 513](#); *In re Bear Commc'ns, LLC*, [2021 WL 4898422, at *7](#) (Bankr. D. Kan. Oct. 19, 2021) (“The Court continues to believe that the Tenth Circuit would join with other circuits in recognizing derivative standing suits in limited circumstances where the trustee or debtor-in-possession has unjustifiably refused to pursue the proposed claims.”); *Rindlesbach v. Jones*, [532 B.R. 850, 858](#) (D. Utah 2015) (“This court agrees with the Bankruptcy Court for the District of Kansas’ conclusion in *Vill. of Overland Pointe, LLC v. Terra Bentley II, LLC (In re Bentley II, LLC)* that there is ‘no reason to believe the Tenth Circuit would disagree with the unanimous view of the Circuits that have decided [that derivative suits are permitted.]’”).

32. A court may grant derivative standing to a committee on a showing that the committee made demand on the debtor to bring a claim; the demand was unjustifiably refused; the

³ While the 10th Circuit BAP may have initially indicated in a 2004 decision that derivative standing for committees was not permissible, *see In re Fox*, [305 B.R. 912](#) (10th Cir. BAP 2004), other courts in the 10th Circuit have distinguished this case and noted that “[e]very circuit court that has ruled on the question of derivative standing after *Hartford* has allowed it” and “[a]lmost all bankruptcy courts, BAPs, and district courts have ruled the same way.” *In re Roman Cath. Church of Archdiocese of Santa Fe*, [621 B.R. 502, 506](#) (Bankr. D.N.M. 2020). *See also In re Bear Commc'ns, LLC*, [2021 WL 4898422](#), at *7 (Bankr. D. Kan. Oct. 19, 2021) (“The Court continues to believe that the Tenth Circuit would join with other circuits in recognizing derivative standing suits in limited circumstances where the trustee or debtor-in-possession has unjustifiably refused to pursue the proposed claims.”).

claim is colorable; and the committee seeks court permission to bring the claim. *In re Roman Cath. Church of Archdiocese of Santa Fe*, [621 B.R. at 508–09](#).

33. The Committee can prove each such element here.

B. The Committee Has Demanded and the Debtor Has Unjustifiably Failed to Pursue Insider and Affiliate Claims

34. The Debtor’s management is conflicted and has demonstrated an unwillingness or inability to pursue insider claims despite demands for such by the Committee.

35. The Affiliate Loans, detailed above, are insider transactions on unsecured, below-market terms with long-out maturities, made to entities under Mr. Tilton’s control and constituting the Estate’s principal assets. Additionally, the Debtor has many questionable transactions with Blue Castle under the Cash Management Agreement.

36. The Committee has raised these issues with the Debtor and has asserted that the Debtor should pursue claims based on these insider and affiliate transactions.

37. However, as set forth above, the Debtor has unjustifiably refused to pursue such actions. Additionally, more than 18 months have elapsed since the start of this case; the Debtor has had more than enough time to pursue these claims but has failed and refused to do so.

38. These facts establish both a refusal by the Debtor to pursue such claims, despite requests to do so, and disabling conflicts that disincentivize the Debtor from bringing such claims. These issues warrant derivative standing for the Committee.

C. The Proposed Claims Are Colorable

39. Additionally, the record in this case shows plausible, well-pled claims that meet the “colorable” threshold, which requires claims that could survive a motion to dismiss. *See In re Bear*

Commc'ns, LLC, [2021 WL 4898422](#), at *8. These claims include, but are not limited to, the following:

- Avoidance and recovery claims for the unsecured, below-market Affiliate Loans transferring value to affiliates controlled by an insider, with delayed maturities and inadequate consideration;
- Claims for commingling of estate and customer cryptocurrency, leading to questions and concerns of estate assets leaving the estate; and
- Other potential claims related to transactions with Blue Castle, including unaccounted payments without proper reconciliation.

40. These facts are largely set forth in the Committee's Trustee Motion and are supported by evidence that could survive a motion to dismiss. *See* Trustee Motion at 4–6, 12–13.

The Committee now seeks Court permission to pursue such claims.

D. Derivative Standing Is in the Best Interests of the Estate

41. The best interests of the Estate strongly favor the grant of derivative standing to the Committee to pursue these Derivative Actions, especially given the upcoming statute of limitation deadlines and the need for independent oversight in this case.

42. As stated above, the Section [546\(a\)](#) limitation period expires June 20, 2026, approximately four months away, and the Committee still lacks complete access to the Debtor's records needed to finalize claims. With no trustee yet appointed to take up the Derivative Actions, the Committee seeks authorization to do so in order to preserve and pursue known and currently knowable claims before they lapse. This will provide a step forward for whatever trustee is

eventually appointed, either in the current Chapter 11 case, as requested by the Committee, or in a Chapter 7 case upon conversion, as requested by the Debtor.

43. While all parties agree that the Debtor needs to be taken out of possession, the only disagreement is whether the trustee should be appointed in this Chapter 11 case or in a Chapter 7 case. Upon the appointment of a trustee under either option, Section [546\(a\)\(1\)\(B\)](#) dictates that the statute of limitations for avoidance actions will be extended for a period of one additional year from the appointment of a trustee. The granting of standing to the Committee to begin the process of commencing actions against insiders will merely speed up this process and give the trustee a headstart.

44. It is imperative to get the Debtor out of possession; to appoint a trustee who will begin to investigate all claims, and particularly the large insider claims; and to extend the statute of limitations by an additional year. This is in accord with the statutory deadline set forth in Section 1112(b) emphasizing the Code's statutory preference for a quick decision on these key motions. In the meantime, however, the Committee seeks this additional relief to move forward with claims against insiders that need to be pursued for the benefit of creditors.

45. Additionally, there are assets, such as the Solara Property, purchased by diversion of Estate assets to these less-than-market Affiliate Loans, that need immediate protection against further impairment and undisclosed secured loans against the property. Without granting the Committee standing to pursue these claims, known assets such as the Solara Property cannot be pursued and protected from further impairment.⁴

⁴ As things currently stand, there is no oversight into whether the Solara Property is being adequately protected and whether the Debtor and its Affiliates have allowed more liens to be placed on the property without notifying the Court.

46. Furthermore, the more time that expires, the more difficult it will be to trace, support, and bring claims relating to the Debtor's cryptocurrency holdings. The nature of cryptocurrency makes it difficult to safeguard and trace, and the longer the Debtor's cryptocurrency sits unsupervised, the more difficult it will be to bring and support claims related to this cryptocurrency. Thus, time is of the essence on these potential claims as well.

47. Ultimately, the relief sought herein is just an interim step to benefit creditors of this Estate. The Committee has proposed a plan because it recognizes that, in order to pursue all claims against insiders that exist in this case, it needs to have a plan confirmed and a plan administrator appointed to bring additional Estate claims against insiders and affiliates. This structure is best suited to help avoid potential *in pari delicto* defense issues that could hinder these claims against Debtor insiders and affiliates under a Chapter 7 proceeding or another alternative structure. *See* [Doc. No. [433](#)] at 12.⁵

48. Finally, the Committee has done substantial preparatory work and is ready to investigate the potential claims of the Estate once authority and standing are so granted.

VI. CONCLUSION

For the foregoing reasons, the Committee respectfully requests entry of an order:

Indeed, the fact that the Debtor's affiliate allowed an undisclosed lien to be placed on the Solara Property was one of the reasons the Court cited for terminating exclusivity. [Doc. No. [243](#)].

⁵ The Committee is asking for this interim relief to move claims against insiders forward immediately and to protect assets, such as the Solara Property purchased with transfers to insiders, for the benefit of creditors, but recognizes that ultimately, it still believes moving forward with the Committee's plan is in the best interest of creditors. Not only does it manage the *in pari delicto* defense that might otherwise wrongly protect insiders and affiliates, but it also avoids the delay and headache of determining proper claim amounts for Chapter 7 trustee voting purposes if the case were converted to a Chapter 7 case. This is particularly challenging since the Debtor has never amended its Statements and Schedules to reflect proper claim amounts, despite the Court's decision back in October 2024 in which it found that the Debtor had wrongly categorized two groups of claims as contingent/unliquidated with "unknown" claim amounts. [Doc. No. [190](#)].

(a) granting the Committee derivative standing to investigate, commence, prosecute, and, subject to Court approval, settle the Derivative Actions against insiders, affiliates, and all mediate and immediate transferees;

(b) providing that, upon (1) the appointment of a Chapter 11 trustee, (2) confirmation of a Chapter 11 plan, or (3) conversion of the case to a Chapter 7 case and appointment of a Chapter 7 trustee, litigation authority for the Derivative Actions shall vest in a Chapter 11 trustee, a Chapter 11 plan trustee/plan administrator appointed under Section [1123\(b\)\(3\)\(B\)](#), or a Chapter 7 trustee, as appropriate, without prejudice to the Committee's interim authority; and

(c) granting such other and further relief as the Court deems just and proper.

Dated: February 20, 2026

Respectfully submitted,

GREENBERG TRAURIG, LLP

/s/ Abigail Stone
Annette W. Jarvis
Carson Heninger
Abigail J. Stone

Attorneys for the Committee

CERTIFICATE OF SERVICE BY NOTICE OF ELECTRONIC FILING (CM/ECF)

I hereby certify that on this 20th of February, 2026, I electronically filed the foregoing with the United States Bankruptcy Court for the District of Utah by using the CM/ECF system. I further certify that the parties of record in this case, as identified below, are registered CM/ECF users and will be served through the CM/ECF system.

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/s/ Abigail Stone

CERTIFICATE OF SERVICE – MAIL, OTHER

I further certify that I caused to be served a true and correct copy of the Notice as follows:

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