

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

IN RE: §
MASTER LENDING GROUP, LLC, § Bankr. Case No. 23-40569-EJC
Debtor. § Chapter 7
§

**MOTION FOR EXAMINATION AND DOCUMENT PRODUCTION PURSUANT TO
BANKRUPTCY RULE 2004**

Mary Ida Townson, U.S. Trustee for Region 21, through the undersigned counsel, respectfully moves for an order pursuant to Bankruptcy Rule 2004 directing an authorized representative of Truist to appear for examination by counsel for the U.S. Trustee and to produce the documents described in the Appendix A attached to the proposed order submitted with this motion. The documents shall be produced on or before September 15, 2023, or on such other date as the parties may subsequently agree. The place of production shall be the Office of the U.S. Trustee, ATTN: Matthew E. Mills, 33 Bull Street, Suite 400, Savannah, GA 31401. It is preferred that the documents be produced in Adobe .pdf format.

The examination will occur on September 20, 2023, at 10:00 a.m. (Eastern Time) or at such other date and time as agreed to by the parties. The examination will be conducted telephonically (or by video conference in accord with any subsequent agreement between the parties) and will be recorded electronically.

Dated: August 8, 2023

Respectfully submitted,
MARY IDA TOWNSON
UNITED STATES TRUSTEE, REGION 21

By: /s/ Joel Paschke
IL Bar No. 6275662

Office of the U.S. Trustee
33 Bull Street, Suite 400
Savannah, Georgia 31401
(912) 652-4112

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify under penalty of perjury that I served the foregoing MOTION FOR EXAMINATION AND DOCUMENT PRODUCTION PURSUANT TO BANKRUPTCY RULE 2004 and related proposed order on the parties listed below via U.S. Mail, postage prepaid. In addition, I have emailed copies of the motion and order to the email addresses listed below. Finally, electronic service will be received by those parties that are entitled to receive such service in this case through the electronic filing system of this Court.

Truist
Attn: Kevin J. Patroni
214 N. Tryon Street, 44th Floor
Charlotte, NC 28202
Email: Kevin.Patroni@truist.com

Judith D. Hirsch, in her capacity
as agent for Gregory M. Hirsch
308 Megan Court
Savannah, GA 31405

S. Elizabeth Hall, Esq.
James F. Banter, Esq.
James Bates Brannan Groover LLP
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Email: ehall@jamesbatesllp.com
jbaxter@jamesbatesllp.com

Date: August 8, 2023

/s/ Joel Paschke

Office of the U.S. Trustee
33 Bull Street, Suite 400
Savannah, Georgia 31401
(912) 652-4112

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF GEORGIA**

In re:

MASTER LENDING GROUP, LLC,

Debtor.

Case No. 23-40569-EJC

Chapter 7

ORDER FOR RULE 2004 EXAMINATION

IT IS HEREBY ORDERED that the U.S. Trustee's motion for a Rule 2004 examination is granted, and that an authorized representative of Truist shall appear for an examination under oath pursuant to Bankruptcy Rule 2004 via telephone (or video conference if the parties subsequently agree) on **September 20, 2023**, commencing at **10:00 a.m. (Eastern Time)**, or such other date and time as the parties may subsequently agree.

IT IS FURTHER ORDERED that Truist shall produce the documents described in the attached Appendix A. The documents are to be produced on or before **September 15, 2023**, preferably by emailing them to counsel for the U.S. Trustee in Adobe .pdf format.

[END OF DOCUMENT]

Prepared by:

/s/ Joel Paschke

IL Bar No. 6275662

Office of the U.S. Trustee

33 Bull Street, Suite 400

Savannah, GA 31401

(912) 652-4112

Joel.Paschke@usdoj.gov

Appendix A

Description of Documents Requested

The U.S. Trustee requests production of the following documents covering the period from **January 1, 2015**, through **June 30, 2023**:

- (1) all bank statements, deposit slips, canceled checks, and signature cards for any account over which Gregory Hirsch has or had signatory authority;
- (2) all credit card statements for accounts on which Gregory Hirsch was an authorized user; and
- (3) any personal financial statements or loan applications submitted by Gregory Hirsch.