

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

IN RE:

**MASTER LENDING GROUP, LLC,

Debtor.**

CHAPTER 7

CASE NO. 23-40569-EJC

**TIFFANY E. CARON, Chapter 7 Trustee
for the Bankruptcy Estate of
Master Lending Group, LLC**

Plaintiff,

v.

**JUDITH HIRSCH,

Defendant.**

Adv. Pro. No. 23-04013-EJC

MOTION TO DISMISS

COMES NOW Judith Hirsch (“Defendant”), and respectfully moves this Court to dismiss Plaintiff’s Complaint in this Adversary Proceeding (DN. 1) with prejudice. Defendant makes this Motion pursuant to Federal Rule of Civil Procedure 12(b)(6) as made applicable by Federal Rule of Bankruptcy Procedure 7012(b). In support of this Motion, Defendant contemporaneously files her memorandum of law containing arguments and citation of authorities which is adopted herein.

WHEREFORE, Defendant prays for the following relief:

- (a) That this Court grant her Motion to Dismiss; and
- (b) For such other and further relief as this Court deems just and proper.

Respectfully submitted this 6th day of October, 2023.

JONES & WALDEN LLC

/s/ Leon S. Jones

Leon S. Jones

Georgia Bar No. 003980

Cameron M. McCord

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF GEORGIA
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IN RE: MASTER LENDING GROUP, LLC, Debtor.	CHAPTER 7 CASE NO. 23-40569-EJC
TIFFANY E. CARON, Chapter 7 Trustee for the Bankruptcy Estate of Master Lending Group, LLC Plaintiff, v. JUDITH HIRSCH, Defendant.	Adv. Pro. No. 23-04013-EJC

CERTIFICATE OF SERVICE

I certify that the foregoing *Motion to Dismiss* (the “Motion”) were electronically filed using the Bankruptcy Court’s Electronic Case Filing program which sends a notice of and an accompanying link to the Amendment to the following parties who have appeared in this case under the Bankruptcy Court’s Electronic Case Filing program:

- **Natalie Rowland** nrowland@taylorenghish.com

This 6th day of October, 2023.

JONES & WALDEN LLC

/s/ Leon S. Jones

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