

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANAH DIVISION**

In Re:	§	Case No.: 23-40569-EJC
	§	
MASTER LENDING GROUP, LLC,	§	(Chapter 7)
	§	
Debtor	§	

**MOTION FOR EXAMINATION AND DOCUMENT PRODUCTION
BY LOW COUNTRY DEVELOPMENT GROUP, LLC PURSUANT TO BANKRUPTCY
RULE 2004 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

COMES NOW, Tiffany E. Caron, as Chapter 7 Trustee (“**Trustee**”) for the bankruptcy estate of Master Lending Group, LLC (“**Debtor**”), and files this *Motion for Examination and Document Production by Low Country Development Group, LLC Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure* (the “**Motion**”), seeking an Order authorizing the examination of Low Country Development Group, LLC (“**LCD**”) under Rule 2004 of the Federal Rules of Bankruptcy Procedure, and in support thereof respectfully shows this Court as follows:

Jurisdiction and Venue

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409(a).

Background

2. On July 6, 2023 (the “**Petition Date**”), Debtor initiated this case by filing a voluntary petition for relief under Chapter 7 of Title 11 of the United States Code (the “**Bankruptcy Code**”).

3. Trustee was thereafter appointed and remains the duly acting Chapter 7 trustee in this case.

4. At the commencement of the Bankruptcy Case, a bankruptcy estate was created pursuant to 11 U.S.C. § 541(a) (the “**Bankruptcy Estate**”), and that Bankruptcy Estate includes all Debtor’s legal or equitable interests in property as of the commencement of the bankruptcy case and any interest in property that the estate acquires after commencement of the bankruptcy case. 11 U.S.C. § 541(a)(1) and (7) (2018). Trustee is the sole representative of the Bankruptcy Estate. 11 U.S.C. § 323(a) (2018).

5. Debtor filed this case as asset case. [Doc. No. 1 at Page 3 of 50].

6. The Petition and Schedules show Gregory Hirsch as the owner of Master Lending Group, LLC (Doc No. 1).

7. The Georgia Secretary of State lists Gregory Hirsch as the Registered Agent for Low Country Development Group, LLC.

8. On information and belief, Gregory Hirsch is also the owner of Low Country Development Group, LLC.

9. The Debtor and LCD made various loans to Synergy Designer Homes, Inc. (“Synergy”) totaling over \$10 million dollars (approximately \$9.76 million from Debtor and \$525,000 from LCD).

10. Documentation from the Debtor’s bank statements and Synergy show that Synergy repaid approximately \$2 million dollars to MLG and over \$2.5 million dollars to LCD, funds which should have been paid to the Debtor.

11. The Debtor’s bank statements from Truist Bank show transfers of approximately \$1,500,000 from LCD to the Debtor and transfers of approximately \$545,000 from Debtor to LCD.

12. LCD has received payments from Synergy which are property of the bankruptcy estate.

Relief Requested

13. Trustee requests authority to examine LCD with respect to the financial affairs of the Debtor. Trustee requests that the examination commence on a mutually agreeable date and time, at the Office of the United States Trustee, 33 Bull Street, Suite 400, Savannah, GA 31401, by Zoom video conference, or at such other mutually agreeable place.

14. Trustee also requests an order from the Court requiring LCD to produce, on or before November 7, 2023 to the Trustee, any and all records and items listed on Appendix “A,” (the “**Documents**”) attached hereto and incorporated herein by reference.

Basis for Relief

15. Rule 2004 provides that any party in interest, including a creditor, may examine any other entity about the financial affairs of a debtor. Fed. R. Bankr. P. 2004.

16. Because Trustee is a party in interest, it is well within the Court’s discretion to grant the relief requested in this Motion. Indeed, such an examination is necessary for Trustee to evaluate fully the interest of the Bankruptcy Estate, if any, along with the circumstances that led to the bankruptcy filing of the Debtor.

WHEREFORE, Trustee respectfully requests that this Court:

(a) Enter an order authorizing Trustee to conduct the examination of LCD at a mutually agreeable time and place and directing LCD to produce the documents and items requested herein; and

(b) Grant such other and further relief as the Court may deem just and proper.

Respectfully submitted this 16th day of October, 2023.

Respectfully submitted,

/s/ Tiffany E. Caron
Tiffany E. Caron
Ga. Bar # 745089
Attorney for Trustee

P.O. Box 711
West Palm Beach, FL 33402
404.647.4917
Tiffany.caron@hotmail.com

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

All Bank Statements, Cancelled Checks, Deposit Slips, Electronic and Wire Transfer Confirmations for the Low Country Development Group, LLC (“LCD”) bank account with Truist Bank (Account ending 3456) and any other bank accounts owned by or in the name of Low Country Development Group, LLC for the period of March 1, 2014 to present.

Any and all correspondence between Master Lending Group, LLC and/or Gregory Hirsch and Synergy Designer Homes, Inc. (“Synergy) or a related entity and/or John Read Brennan regarding payments or promissory notes between Debtor and/or LCD and Synergy for the period of March 1, 2014 to present.

Any and all loan documents evidencing loans made by Debtor and/or LCD to Synergy and/or John Read Brennan or any entity related to Synergy or John Read Brennan for the period of March 1, 2014 to present.

The Trustee is agreeable to review and discuss this Document production to ease or limit the burden on LCD. Please contact the Trustee to discuss the Document Production.

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

IN THE MATTER OF:)
)
Master Lending Group, LLC,) CHAPTER 7 CASE NO.: 23-40569-EJC
)
)
DEBTOR)

CERTIFICATE OF SERVICE

This is to certify that I have this date served the foregoing, **Motion for Examination of and Document Production by Low Country Development Group, LLC under Rule 2004 of the Federal Rules of Bankruptcy Procedure**, through CM/ECF or by depositing same in the United States Mail with sufficient postage affixed thereon, to those addressed below:

Judson C. Hill
Gastin & Hill
Gastin & Hill, P O Box 8012
Savannah, GA 31412

Office of the U.S. Trustee
33 Bull Street, Suite 400
Savannah, GA 31401

Low Country Development Group, LLC,
Gregory Hirsch, RA
Thomas J. Ratcliffe, Jr.
Executor of the Estate of Gregory Hirsch
103 North Main Street
Hinesville, GA 31313

James F. Banter
James-Bates-Brannan-Groover-LLP
231 Riverside Drive
Macon, GA 31201

And all other creditors and parties in interest receiving notice through the Court’s CM/ECF Filing System.

This the 16th day of October, 2023.

/s/ Tiffany E. Caron
TIFFANY E. CARON, Trustee/Petitioner

Prepared by:
TIFFANY E. CARON, ESQ.
GA BAR NO. 745089
CHAPTER 7 TRUSTEE
P.O. BOX 711

WEST PALM BEACH, FL 33402
404-647-4917
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**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 Low Country Development Group, LLC shall appear for examination under oath at a date and time mutually agreed upon by the parties;

IT IS FURTHER ORDERED that Low Country Development Group, LLC shall produce to the Trustee the documents listed in Appendix A on or before November 7, 2023 or as otherwise agreed upon by the parties.

END OF DOCUMENT

Prepared by:

/s/ Tiffany E. Caron

TIFFANY E. CARON, ESQ.

GA BAR NO. 745089

CHAPTER 7 TRUSTEE

P.O. BOX 711

WEST PALM BEACH, FL 33402

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