

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

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<b>In Re:</b>	)	<b>Chapter 7 Case 23-40569-EJC</b>
	)	
<b>Master Lending Group, LLC</b>	)	
	)	
<b>Debtor(s).</b>	)	

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**RESPONSE TO CHAPTER 7 TRUSTEE’S MOTION FOR TURNOVER & REQUEST  
FOR HEARING**

Comes now the Respondent, Judson C. Hill, and files this response to the Trustee’s motion for turnover:

1. The Debtor filed Chapter 7 on July 6, 2023 and is subject to the jurisdiction of the Court.
  
2. The Chapter 7 Trustee seeks turnover of communications that are subject to claims of attorney-client privilege asserted by the affected parties in interest (see Exhibit A, attached hereto). As such, I have declined to turnover the communications in the absence of an Order from this Court directing that I do so.

Wherefore, Respondent requests that the matter be set for hearing so that all parties in interest on this matter can be heard. Respondent requests such further relief as the Court deems proper.

This 16<sup>th</sup> day of October, 2023.



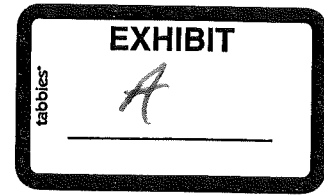
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JUDSON C. HILL, GA BAR 354277  
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ATTORNEYS FOR DEBTOR

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October 3, 2023

### Via Email and U.S. First Class Mail:

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Re: Master Lending Group, LLC, Case No. 23-40569, United States Bankruptcy Court, Southern District of Georgia, Savannah Division

Dear Jud and Jeremiah:

Our firm represents Judy Hirsch in conjunction with Tim Roberts, Esq. and Oliver Maner LLP.

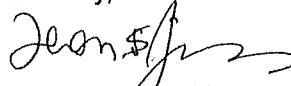
Your firm filed a Chapter 7 bankruptcy case on behalf of Master Lending Group, LLC ("Debtor"). As such you served as counsel for Debtor. During the course of such events, you dealt with Judy Hirsch. Judy Hirsch understood that you also were acting in a capacity as an attorney for her personally and individually. On behalf of Ms. Hirsch, we are confirming to you her understanding and providing notice of the attorney-client relationship that you formed with Ms. Hirsch to the extent that such relationship has not been made clear by you.

As you are aware, Tiffany Caron has been appointed Chapter 7 Trustee in Debtor's bankruptcy case (in such capacity, the "Trustee"). Ms. Hirsch understands that the Trustee has made demand upon you to turn over files of Debtor that are in your possession. You are also in possession of documents that you solicited and obtained from Ms. Hirsch. Certain documents related to Ms. Hirsch and not to Debtor. Ms. Hirsch delivered such documents to you based upon her understanding that you were acting as her attorney and advisor. Therefore, she delivered documents to you – which are her documents – with the understanding that such documents were covered by the attorney-client relationship and privileged.

It is my duty to inform you that you cannot voluntarily produce any documents of Ms. Hirsch to the Trustee. To do so would violate the attorney-client privilege and duty that you owe to Ms. Hirsch. To the extent that you receive a subpoena or other formal request to produce documents from the Trustee or any other party, and to the extent that any such request for document production may potentially request documents of Ms. Hirsch, please advise Tim Roberts (Oliver Maner LLP) and me (Jones & Walden LLC) immediately so that we may seek a protective order,

file a motion to quash, or seek other relief. Please do not voluntarily produce any documents or information pertaining to Ms. Hirsch.

Sincerely,

A handwritten signature in black ink, appearing to read "Leon S. Jones". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Leon S. Jones, Esq.  
Attorney for Judy Hirsch

Cc: Judy Hirsch (via email)  
Tim Roberts, Esq. (via email)

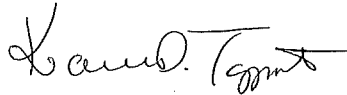
IN RE:  Master Lending Group, LLC  Debtor	Chapter 7 Case No.: 23-40569-EJC
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SOUTHERN DISTRICT OF GEORGIA  
STATE OF GEORGIA

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served a true and correct copy of the **Response to Chapter 7 Trustee's Motion for Turnover and Request for Hearing** to the parties outlined below in Exhibit "A" pursuant to Local ECF Rule 9.

This 16<sup>th</sup> day of October, 2023.



\_\_\_\_\_  
KAREN D. TAGGART, PARALEGAL

GASTIN & HILL  
1020 Drayton Street  
Suite 201  
Savannah, Georgia 31401  
(912) 232-0203

**EXHIBIT "A"**

Tiffany E. Caron, Chapter 7 Trustee  
U.S. Trustee