

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

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

**MOTION FOR EXAMINATION AND DOCUMENT PRODUCTION  
BY JUDITH HIRSCH 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**” or “**MLG**”), and files this *Motion for Examination and Document Production by Judith Hirsch Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure* (the “**Motion**”), seeking an Order authorizing the examination of The Estate of Judith Hirsch 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 an 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. Judith Hirsch is the spouse of the late Gregory Hirsch.

#### **Relief Requested**

8. Trustee requests authority to examine the Judith Hirsch with respect to the financial affairs of the Debtor.

9. Trustee requests an order from the Court requiring Judith Hirsch to produce, on or before February 16, 2024 to the Trustee, any and all records and items listed on Appendix “A,” (the “**Documents**”) attached hereto and incorporated herein by reference.

10. Trustee requests authority to examine Judith Hirsch with respect to the financial affairs of the Debtor. Trustee requests that the examination commence on February 28, 2024 at 10:00 AM or at such other mutually agreeable time at the Office of the United States Trustee, 33 Bull Street, Suite 400, Savannah, GA 31401, or at such other mutually agreeable place.

#### **Basis for Relief**

11. 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.

12. 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.

### **Specific Allegations**

13. The Trustee has obtained documents showing checks from Master Lending Group, LLC were made payable to and deposited into the account of Judith Hirsch.

14. The Trustee has obtained documents showing checks from Master Lending Group, LLC were made payable to various other entities and a dba of Gregory Hirsch which then made payments to Judith Hirsch.

15. The Trustee has obtained documents showing that Master Lending Group, LLC funds were used to pay premiums on life insurance policies owned by or insured on the life of Gregory M. Hirsch for which Judith Hirsch was the sole beneficiary.

WHEREFORE, Trustee respectfully requests that this Court:

- (a) Enter an order authorizing Trustee to conduct the examination of Judith Hirsch and directing Judith Hirsch 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 January, 2024.

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](mailto: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

**Financials:**

For the period of January 1, 2016 to January 15, 2023:

- (1) all bank statements, deposit slips, canceled checks, and signature cards for any account over which Judith Hirsch has or had signatory authority (including but not limited to Wells Fargo Accounts ending 7761, 1316 and 3586, including investment accounts (including, but not limited to, Raymond James and Coinbase);
- (2) all credit card statements for accounts on which Judith Hirsch was an authorized user; and
- (3) any personal financial statements or loan applications submitted by Judith Hirsch.

**Tax Returns:**

Federal and State Income Tax Returns whether filed as Married Filing Jointly or Married Filing Separately for the years of 2014 to 2021 for Judith Hirsch.

**Life Insurance:**

For the period of January 1, 2021 to January 15, 2024:

A list of all life insurance policies insured on the life of Gregory M. Hirsch on which Judith Hirsch is a named beneficiary, including: Name of Insurance Company, Policy Number, Amount of Death Benefit, and Status of Proceeds.

A list of all life insurance policies on the life of Gregory M. Hirsch with premiums paid by Judith Hirsch including: Name of Insurance Company, Policy Number, Amount of Death Benefit, and Status of Proceeds.

Copies of the Sale Agreements with Trelog, Inc. for the sale of New York Life Insurance Policies with Death Benefits of:

- \$7,000,000 New York Life – Sold to Trelog, Inc. for approximately \$3,575,000 on or around February 10, 2023;
- \$5,000,000 New York Life – Sold to Trelog, Inc. for approximately \$2,500,000 on or around February 14, 2023; and
- \$2,500,000 New York Life – Sold to Trelog, Inc. for approximately \$1,375,000 on or around February 14, 2023.

**7 18<sup>th</sup> Street, Tybee Island, Georgia 31328 (the “Property”):**

Any and all documents related to the real estate transactions involving the Property for the period of January 1, 2017 to January 15, 2024.

**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 Judith Hirsch 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:

Timothy Roberts  
Oliver Maner, LLP  
218 W. State Street  
Savannah, GA 31401

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

Leon S. Jones, Esq.  
Attorney for Judith Hirsch  
699 Piedmont Avenue, NE  
Atlanta, GA 30308

Judith Hirsch  
308 Megan Court  
Savannah, GA 31405

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

This the 16th day of January, 2024.

/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  
TIFFANY.CARON@HOTMAIL.COM

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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 Judith Hirsch shall produce to the Trustee the documents listed in Appendix A on or before February 16, 2024 or as otherwise agreed upon by the parties; and

IT IS FURTHER ORDERED that Judith Hirsch shall appear for examination under oath at the Office of the United States Trustee, 33 Bull Street, Suite 400, Savannah, GA 31401, on **February 28, 2024 at 10:00 AM**, 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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