

IT IS ORDERED as set forth below:



Date: January 17, 2024

Edward J. Coleman, III
Chief United States Bankruptcy Court Judge

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

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

**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 the Probate Estate of Gregory M. 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.

END OF DOCUMENT

Prepared by:

/s/ Tiffany E. Caron
TIFFANY E. CARON, ESQ.
GA BAR NO. 745089
CHAPTER 7 TRUSTEE

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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, 2015 to January 15, 2023:

- (1) all bank statements, deposit slips, canceled checks, and signature cards for any account over which Gregory Hirsch has or had signatory authority, including investment accounts (including but not limited to Raymond James and Coinbase);
- (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.

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 Gregory Hirsch.

Life Insurance:

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

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

A list of all life insurance policies paid for by Gregory M. Hirsch out of any personal or business funds, including but not limited to the funds of Master Lending Group, LLC, Low Country Development, LLC, and Hirsch & Co., 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.

Cell Phone and Records:

Production of the cellular phone records and any communication applications for the device used by Gregory M. Hirsch for any and all communications with investors in the two (2) years prior to his death, such records being stored electronically or otherwise.

Any and all communications (written or otherwise), between Gregory Mr. Hirsch and the following individuals, business partners and/or investors, including but not limited to withdrawal of all or a portion principal from January 1, 2022 to August 3, 2023:

- Randy Chu
- Alena Chu
- Mai Chu
- Jonathan Chu
- Vanessa Jones
- Michael Jones
- James Jones
- Chris Williams
- Robert Isaacson
- Dean Flake
- Motti Locker
- David Kahn
- Lewis and/or Julie Mazzo
- James C. Wilson, Jr.
- Sheri Simon
- Nicole Chu
- Frederick and Renie Halperin
- David Klugman
- Jeff Notrica

7 18th 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.

10 Whitaker, LLC

Closing Statement on the Sale of 10 Whitaker Street, Savannah, GA 31401