

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.	)	
_____	)	

**MOTION FOR PRODUCTION OF DOCUMENTS**  
**PURSUANT TO BANKRUPTCY RULE 2004**

COMES NOW, Truist Bank (“Truist”), a party-in-interest in the above-captioned bankruptcy case of Master Lending Group, LLC (“Debtor”), and files this *Motion for Production of Documents Pursuant to Bankruptcy Rule 2004* (the “Motion”), seeking an Order authorizing (1) Truist to produce certain banking records of the Debtor under the control of the Chapter 7 trustee in this case, Tiffany E. Caron (the “Trustee”) to the Plaintiff (as later defined herein) in the Litigation (as later defined herein), and (2) authorizing the Trustee to produce to Truist certain records in her possession and control related to the Debtor in response to subpoenas issued to and served upon the Trustee in the Litigation.

**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).
2. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409(a).

**Background**

3. On December 14, 2023, Barbara Aronson, individually and on behalf of the Aronson Family Residence Trust and Barbara Aronson IRA (“Plaintiff”), filed a civil lawsuit styled *Aronson, et al. v. Thomas Ratcliffe, et al.*, Civil Action File No. STCV23-02510, in the State

Court of Chatham County, Georgia (the “Litigation”). The Litigation names Truist as a defendant, along with (1) Thomas Ratcliffe, the administrator of the estate of deceased accountant Gregory Hirsch (“Hirsch”), and (2) Hirsch’s accounting firm, Hirsch & Tucker LLC (“Hirsch & Tucker”).

4. In broad terms, the Litigation alleges that, over decades, Plaintiff invested substantial sums of money in the Debtor through Hirsch but lost some or all of those funds because Hirsch operated the debtor as a Ponzi scheme. In addition to various claims against Hirsch and Hirsch & Tucker, Plaintiff seeks to hold Truist responsible for Hirsch’s alleged fraud because the Debtor conducted its banking primarily through Truist. Essentially, Plaintiff alleges that Truist knew or should have known that the Debtor was a Ponzi scheme but failed to alert take action to stop the Ponzi scheme, enabling Plaintiff to avoid her losses. In connection with these claims, Plaintiff alleges that Truist was aware of the Ponzi scheme and knowingly participated in the underlying fraud by allowing the Debtor to continue its banking activities.

5. On July 6, 2023 (the “Petition Date”), the 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”).

6. The Trustee was thereafter appointed as the duly acting Chapter 7 trustee in this case.

7. On December 14, 2023, the Plaintiff in the Litigation served certain requests for production of documents (the “RFPs”) on Truist requesting, among other things, the Debtor’s bank account records concerning its account(s) at Truist, including documents, checks, correspondence, and bank statements. A copy of the RFPs is attached hereto as **Exhibit 1**. Truist has requested the Trustee to confirm that she has no objection to the production by Truist of the Debtor’s bank records to the Plaintiff.

8. Prior to filing this present motion, Truist conferred with the Trustee regarding the release of the Debtor's banking information subject to the RFPs (the "Banking Records"). The Trustee informed Truist that she could neither produce, nor authorize the production of, this information without permission from this Court.

9. At Truist's request, the State Court in the Litigation has issued subpoenas directed to the Trustee seeking production of certain records of and/or related to the Debtor that are relevant to the issues in the Litigation (the "Trustee Records"). Truist has domesticated the subpoenas in Florida, where the Trustee resides, and duly served them on the Trustee. Copies of the subpoenas are attached hereto as Exhibit 2.

10. Prior to filing this Motion, Truist conferred with the Trustee regarding her compliance with the Subpoenas. The Trustee informed Truist that she could neither produce, nor authorize the production of, this information without permission from this Court.

### **Basis for Relief**

11. Rule 2004 of the Federal Rules of Bankruptcy Procedure provides that any party in interest to a bankruptcy case may examine any other entity about "acts, conduct or property, or to the liabilities and financial condition of the debtor[.]" Fed. R. Bankr. P. 2004.

12. In turn, the property of a debtor's estate includes "all legal or equitable interests of the debtor in property as of the commencement of the case." 11 U.S.C. § 541.

13. A party seeking discovery pursuant to Rule 2004 bears the burden of proving that there is good cause for its request. *In re Defoor Centre, LLC*, 634 B.R. 630, 638 (Bankr. M.D. Fla. 2021). In turn, these parties may establish good cause by showing that the "discovery is needed to establish a claim or that denial of the Rule 2004 discovery would cause undue hardship or injustice." *In re Defoor Centre*, 634 B.R. at 638.

14. As Truist is a party in interest to the above-captioned bankruptcy case, and as this Motion requests authorization and production of information that concerns “acts, conduct, or property, or the liabilities and financial condition of the debtor,” it is well within the Court’s discretion to grant the relief requested herein.

15. Good cause exists for the Court to authorize Truist’s production of the Banking Records in the Litigation and the Trustee’s production of the Trustee Records to Truist because both sets of records are central to the claims in the Litigation and because proceeding in the litigation without them would cause undue hardship.

16. The Account Records will be crucial evidence of how much money Plaintiff invested with the Debtor through Hirsch and how much of that money Plaintiff recouped through payments she alleges that she received regularly from the Debtor for years. The amounts of these payments in both directions are essential to the determination of whether Plaintiff suffered any damages, and if so, in what amount. Plaintiff’s own records are sparse and do not give a complete picture of how much Plaintiff invested, what portion of the principal investment was repaid, and what portion, if any, remains outstanding. The Account Records are also important evidence of whether the Debtor was, as Plaintiff alleges, a Ponzi scheme.

17. Similarly, the Trustee Records speak to central issues in the Litigation. The Trustee Records include any correspondence between Hirsch and Plaintiff, which may provide further evidence of the timing and amounts of any payments from Plaintiff to Hirsch for investment in the Debtor and any returns paid by Hirsch or the Debtor back to Plaintiff. Such correspondence may also shed light on how Hirsch represented to Plaintiff how he would invest any funds she provided to him. Moreover, the Trustee Records include any documents originally in the possession of Hirsch & Tucker or Hirsch’s widow, Judith Hirsch, that concern the Debtor—documents that, like

the Account Records, may include critical evidence of the flow of funds among Plaintiff, Hirsch, the Debtor, Hirsch & Tucker, and other third-parties, evidence of whether Hirsch used the Debtor to perpetuate a Ponzi scheme, and evidence of whether Hirsch & Tucker or other individuals had involvement with or control over any such scheme.

WHEREFORE, Truist respectfully requests that this Court:

(a) Enter an order authorizing Truist's production of the Banking Records in the Litigation;

(b) Enter an order authorizing the Trustee to produce the Trustee Records to Truist on or before January 9, 2025, at Truist's counsel's offices at 1230 Peachtree Street NE, 20th Floor, Atlanta, Georgia 30309, or some other mutually agreeable time and place, for review by counsel for Truist; and

(c) Such other and further relief as the Court may deem just and proper.

Respectfully submitted this 12th day of December, 2024.

**BRADLEY ARANT BOULT CUMMINGS LLP**

*/s/ Nancy H. Baughan*

\_\_\_\_\_  
Nancy H. Baughan  
Georgia Bar No. 042575  
nbaughan@bradley.com  
Promenade Tower  
1230 Peachtree Street NE, 20<sup>th</sup> Floor  
Atlanta, GA 30309  
(404) 868-2013  
(404) 868-2010 (Facsimile)

**MCCORKLE, JOHNSON & MCCOY, LLP**

Mathew M. McCoy  
Georgia Bar No. 486273  
mmm@mccorklejohnson.com  
319 Tattnell Street  
Savannah, GA 31401  
(912) 232-6000

*Counsel for Defendant Truist Bank*

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. )  
\_\_\_\_\_ )

**CERTIFICATE OF SERVICE**

I hereby certify that on December 12, 2024, I served a copy of the foregoing *Motion for Production of Documents Pursuant to Bankruptcy Rule 2004* (the “Motion”), and its attached exhibits, through the Court’s CM/ECF system, which will provide electronic notice of these filings with all parties receiving electronic notice in the above-captioned case, including the following:

Tiffany E. Caron  
P.O. Box 711  
West Palm Beach, FL 33402  
Telephone: 404-647-4917

*Chapter 7 Trustee*

Matthew E. Mills  
Office of The U S Trustee  
33 Bull Street, Suite 400  
Savannah, GA 31401  
Telephone: 912-652-4112  
Email: [ustpreion21.sv.ecf@usdoj.gov](mailto:ustpreion21.sv.ecf@usdoj.gov)

*U.S. Trustee*

I further hereby certify that I served a copy of the foregoing Motion and exhibits to the following address via certified U.S. mail:

Master Lending Group, LLC  
308 Megan Court  
Savannah, GA 31405

This 12th day of December, 2024.

/s/ Nancy H. Baughan

Nancy H. Baughan



# **EXHIBIT 1**

**IN THE STATE COURT OF CHATHAM COUNTY  
STATE OF GEORGIA**

BARBARA ARONSON, individually and )  
as the representative of the Aronson )  
Family Residence Trust and Barbara )  
Aronson IRA, )

Plaintiffs, )

v. )

Civil Action No.: STCV23-02510

THOMAS RATCLIFFE, ESQ., )  
Administrator of the Estate of )  
GREGORY HIRSCH, deceased; )  
HIRSCH & TUCKER, LLC; and )  
TRUIST BANK, INC.; )

**PLAINTIFF’S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND  
THINGS TO DEFENDANT TRUIST BANK, INC.**

COMES NOW Plaintiff in the above-styled action, and requires Defendant Truist Bank, Inc. pursuant to O.C.G.A. § 9-11-34, to produce for inspection and copying at the offices of the Plaintiff’s attorney of record, Brent J. Savage, Savage, Turner, Pinckney, Savage & Sprouse, 102 E. Liberty Street, 8<sup>th</sup> Floor, Savannah, Georgia 31401, the following documents within forty-five (45) days of the date of service of this request.

**INSTRUCTIONS**

**NOTE A:** These requests are continuous and should be supplemented if additional information is received at a later date.

**NOTE B:** If documents requested are not in the Defendant’s possession, please state as follows:

- (1) name of person who has possession or knowledge of whereabouts;
- (2) business address of such;

(3) business telephone number of such.

**NOTE C:** If you claim that a privilege applies to any document sought by this request, then state the factual and legal basis for the claimed privilege and identify the document (by date, author, recipient, general subject matter) so that it can be described in a motion to compel.

**NOTE D:** When used in these Requests, the phrases "Defendant", "individual in question", "you", "your", or any synonym thereof are intended to and shall embrace and include, in addition to Defendant, individually, Defendant's attorneys, agents, servants, employees, representatives, private investigators, insurance adjusters, and all others who are in possession of, in control of, or may have obtained information for or on behalf of Defendant.

**REQUESTS FOR PRODUCTION**

1. The original or a certified copy of your complete file on and records concerning Master Lending Group, LLC, including but not limited to financial statements, tax documents, checks, correspondence, and bank statements.
2. A copy of each and every policy of insurance identified in your response to Plaintiff's Interrogatories to you.
3. Copies of all checks from Dr. Leon Aronson and/or any Plaintiff payable to Master Lending Group, LLC.
4. Copies of all checks from Master Lending Group, LLC payable to Dr. Leon Aronson and/or Plaintiffs.
5. All filings from civil action file number 4:21-cv-263, a case filed against you by Master Lending Group, LLC.

6. All documents produced or received during the course of discovery in civil action file number 4:21-cv-263.
7. The bank statements of Master Lending Group, LLC from the last 20 years.
8. The bank statements of Gregory M. Hirsch from the last 20 years.
9. Copies of all your correspondence with Master Lending Group, LLC.
10. Copies of all your correspondence with Gregory M. Hirsch.
11. Any suspicious activity reports concerning Master Lending Group, LLC.
12. Any suspicious activity reports concerning Gregory M. Hirsch.
13. Your policies, procedures, protocols, and training materials that relate to fraud.
14. Your policies, procedures, protocols, and training materials that relate to suspicious activity reports.
15. Your policies, procedures, protocols, and training materials that relate to Know Your Customer laws or regulations.
16. Copies of any written contracts, agreements, or letters of understanding between you and Master Lending Group, LLC.
17. Copies of any applications made by Master Lending Group, LLC (for instance, for a line of credit).
18. If you intend to call any expert witness, please produce your expert witness' resume or CV, all documents or materials provided to or received from the expert, and all correspondence with the expert.
19. The original or duplicated/reprinted copy of each and every document you possess relating to any meeting/investigation described in your response to Plaintiff's First Interrogatories to you.

20. Copies of all documents that you identify or refer to in your responses to any Interrogatory.
21. To the extent not otherwise covered, any document relevant to Plaintiffs' claims or any of your defenses.

This 14th day of December, 2023.

*/s/ Brent J. Savage*  
Brent J. Savage  
Georgia Bar No. 627450

**SAVAGE, TURNER, PINCKNEY, SAVAGE & SPROUSE**  
102 E. Liberty Street, 8<sup>th</sup> Floor  
Savannah, GA 31412  
P.O. Box 10600  
Savannah, GA 31412  
Phone: (912) 231-1140  
[lhatcher@savagelawfirm.net](mailto:lhatcher@savagelawfirm.net)

## **EXHIBIT 2**

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA

Case No. \_\_\_\_\_

BARBARA ARONSON, individually and as  
the representative of the Aronson Family  
Residence Trust and Barbara Aronson IRA,

Plaintiff,

vs

THOMAS RATCLIFFE, ESQ., Administrator  
Of the Estate of Gregory Hirsch, deceased;  
HIRSCH & TUCKER, LLC; and TRUIST BANK,

Defendants.

\_\_\_\_\_/

**SUBPOENA DUCES TECUM**

**THE STATE OF FLORIDA:**

TO: Master Lending Group, LLC  
c/o Bankruptcy Trustee Tiffany E. Caron, Esq.  
215 Pilgrim Road  
West Palm Beach, FL 33405

YOU ARE COMMANDED to produce/deliver said documents to the law office of Bradley Arant Boult Cummings LLP, c/o Nancy H. Baughan, Esq., Promenade Tower, 19th Floor, 1230 Peachtree Street NE, Atlanta, GA 30309. The following documents are hereby subpoenaed:

See attached Subpoena for Production of Documentary Evidence enclosed herewith.

These items will be inspected and may be copied at that time. You will not be required to surrender the original items. You may comply with this subpoena by providing legible copies of the items to be produced to the attorney whose name appears on this subpoena on or before the scheduled date of production. You may condition the preparation of the copies upon the payment in advance of the reasonable cost of preparation. You may mail or deliver the copies to the attorney whose name appears on this subpoena and thereby eliminate your appearance at the time and place specified above. You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the attorney whose name appears on this subpoena. THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.

If you fail to:

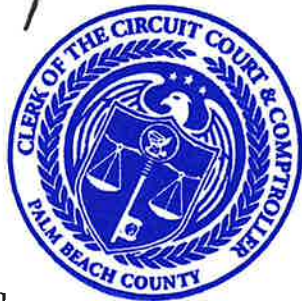
- (1) appear as specified; or
- (2) furnish the records instead of appearing as provided above; or
- (3) object to this subpoena,

you may be in contempt of court. You are subpoenaed to appear by the following attorney, and unless excused from this subpoena by this attorney or the court, you must respond to this subpoena as directed:

Jacob B. Hanson  
Attorney for Defendant Truist Bank  
1001 Water Street, Suite 1000  
Tampa, FL 33602  
[jhanson@bradley.com](mailto:jhanson@bradley.com)  
Bar No. 91473

DATED on

11/27/2024



Joseph Abruzzo  
As Clerk of the Circuit Court

By *Raeon A. Lee*  
As Deputy Clerk

Cc:

Brent J. Savage, Esq.  
Lezlie Hatcher, Esq.  
Savage, Turner, Pinckney, Savage & Spouse  
102 E. Liberty Street, 8th Floor  
Savannah, GA 31412  
[bsavage@savagelawfirm.net](mailto:bsavage@savagelawfirm.net)  
[lhatcher@savagelawfirm.net](mailto:lhatcher@savagelawfirm.net)  
*Counsel for Plaintiff*

William S. Mann, Esq.  
Bubba Dunn, Esq.  
Hall Booth Smith, P.C.  
3528 Darien Highway, Suite 300  
Brunswick, GA 31525  
[wmann@hallboothsmith.com](mailto:wmann@hallboothsmith.com)  
[bdunn@hallboothsmith.com](mailto:bdunn@hallboothsmith.com)  
*Counsel for Defendant Thomas Ratcliff, Esq., Administrator  
of the Estate of Gregory Hirsch and Hirsch & Tucker, LLC*



**IN THE STATE COURT OF CHATHAM COUNTY**

133 Montgomery Street, Room 501, Savannah, GA 31401

www.statecourt.org · Ph (912) 652-7224 · FAX (912) 652-7229 · clerk@statecourt.org

**SUBPOENA FOR PRODUCTION OF DOCUMENTARY EVIDENCE**

TO:

**Master Lending Group, LLC**  
C/O Bankruptcy Trustee Tiffany E. Caron, Esq.  
215 Pilgrim Rd.  
West Palm Beach, FL 33405

**Barbara Aronson**

*Plaintiff*

**Thomas Ratcliffe, Esq., et al.**

*Defendant*

Case Number: **STCV 23-02510**

You are hereby required to be and appear at the State Court of Chatham County, Georgia before the Honorable, \_\_\_\_\_ Judge of the State Court of Chatham County, in Courtroom \_\_\_\_\_ of the Chatham County Courthouse at \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ and to bring with you into said Court certain documents to be used as evidence in the above styled case pending in the State Court of Chatham County **OR** deliver said documents to the law office of:

**Bradley Arant Boulton Cummings, LLP**, C/O Nancy H. Baughan, Esq.  
Promenade Tower, 19th Floor, Atlanta GA 30309

The following documents are hereby subpoenaed:

**See attached Request for Production of Documents**

Herein fail not, under penalty of law.

Witness the Honorable Judges of State Court of Chatham County, Georgia this day of \_\_\_\_\_ 20 .



David A. Wood, Clerk of Court  
State Court of Chatham County, Georgia

By: /s/ Deone Wilson  
*valid upon signature of a deputy clerk*  
Deputy Clerk, State Court

If you have questions contact

Nancy H. Baughan, Esq.  
**Bradley Arant Boulton Cummings, LLP**  
Promenade Tower, 19th Floor  
Atlanta GA 30309  
(404) 868 2004 / nbaughan@bradley.com

**IN THE SUPERIOR COURT OF CHATHAM COUNTY  
STATE OF GEORGIA**

BARBARA ARONSON, individually and as  
the representative of the Aronson Family  
Residence Trust and Barbara Aronson IRA,

Plaintiff,

v.

Civil Action No. STCV 23-02510

THOMAS RATCLIFFE, ESQ., Administrator  
of the Estate of Gregory Hirsch, deceased;  
HIRSCH & TUCKER, LLC; and TRUIST  
BANK;

Defendants.

**DEFENDANT TRUIST BANK’S FIRST REQUESTS FOR PRODUCTION  
TO NON-PARTY MASTER LENDING GROUP, LLC**

To: **Master Lending Group, LLC**  
C/O Bankruptcy Trustee for Master Lending Group, LLC – Tiffany E. Caron, Esq.  
215 Pilgrim Rd.  
West Palm Beach, FL 33405

Pursuant to O.C.G.A. §§ 9-11-26 and 9-11-34, Defendant Truist Bank (“Truist”) hereby requests that Master Lending Group, LLC (“Master Lending”) produce to Defendant in the above-styled matter Truist Bank (“Truist”) the documents requested below that are in the possession, custody, or control of Mater Lending within 30 days from the date of service of these discovery requests. Responsive documents shall be produced to Nancy Baughan, Bradley Arant Boult Cummings LLP, Promenade Tower, 20th Floor, 1230 Peachtree Street NE, Atlanta, GA 30309. These Requests shall be deemed to be continuing and Master Lending is under a duty to update all responses as required by law.

**Introduction, Definitions, and Instructions**

A. As used herein, the terms “Master Lending,” “you,” and “your” refers without limitation to Master Lending Group, LLC, along with any attorneys, agents, employees,

representatives, or other persons acting or purporting to act in any manner for or on its behalf.

- B.** As used herein, the term “Truist” shall mean defendant Truist Bank, successor by merger to SunTrust Bank, and includes Truist’s predecessor, SunTrust Bank, and their employees, attorneys, agents, and all persons acting on their behalf.
- C.** As used herein, the term “Mr. Hirsch” shall mean Gregory Hirsch, member of Wallin Street.
- D.** As used herein, the term “Aronson” shall mean the Plaintiff in the above-styled action, Barbara Aronson, individually and as the representative of the Aronson Family Residence Trust and Barbara Aronson IRA.
- E.** As used herein, the term “Hirsch & Tucker, LLC” shall mean defendant in the above-styled action Hirsch & Tucker, LLC, its employees, attorneys, agents, and all persons acting on its behalf.
- F.** As used herein, the term “Master Lending” or “Master Lending Group, LLC” shall mean, Master Lending Group, LLC, its employees, attorneys, agents, and all persons acting on its behalf, including but not limited to Gregory Hirsch.
- G.** The term “person” or “persons” shall mean any individual, entity of any kind, corporation, joint venture, partnership, association, or any other association of individuals or entities.
- H.** As used herein, the word “document” is defined pursuant to the broadest definition permitted, in whatever form and however and by whomever made. The word “document” means any writing or other tangible thing, or any other thing or electronic medium on which information is stored or recorded or from which information can be retrieved, and is in your possession, custody, or control, or your agents, and all persons acting on your behalf. This specifically includes, without limitation, all writings or other written materials and all other

physical objects, all correspondence, letters, envelopes, certified mail receipts, facsimiles, telegrams, memoranda, handwritten notes, diaries, personal organizers, personal calendars, contracts, agreements, understandings, drafts, papers, periodicals, pamphlets, reports, statements, invoices, receipts, financial records, canceled checks (front and back), deposit slips, bank statements, accounts, journals, ledger cards, profit and loss statements, financial statements, audited and unaudited reports, audits, studies, working papers, corporate minutes, minute books, deeds, charts, indexes, data sheets, data processing cards, tapes, video tapes, photographs, films, sound recordings, or any other physical object however produced or reproduced in your actual or constructive possession, custody, or control or that of your employees, agents, or attorneys. Additionally, the term “document” or “documents” specifically includes any electronically stored documents, messages, or other information, whether stored on computer databases, electronic mail (*i.e.* e-mail), social media platforms (*e.g.* Facebook, Twitter, Instagram, etc.), mobile phone applications, or otherwise.

- I. The terms “communication” or “communications” as used herein mean any oral, written, or electronic transmittal of information or request for information made from one person to another person, whether made in person, electronically, by telephone or cellular phone, or by any other means and includes any document made for the purpose of recording a communication, a fact, an idea, a statement, an inquiry, an opinion, a belief or otherwise.
- J. As used herein, the singular shall include the plural, and the plural shall include the singular. The conjunctive “and” shall include the disjunctive “or,” and the disjunctive “or” shall include the conjunctive “and.”
- K. As used herein, the following terms have the meanings designated below:

- i. The term “Complaint” shall mean the Complaint filed by Plaintiff in the above-styled action on or about December 14, 2023.
- ii. The term “FAC” shall mean that First Amended Complaint filed by Plaintiff in the above-styled action on or about March 13, 2024.
- iii. The term “SAC” shall mean that Second Amended Complaint filed by Plaintiff in the above-styled action on or about June 7, 2024.
- iv. The term “Litigation” shall mean the above-styled action, captioned *Barbara Aronson, individually and as the representative of the Aronson Family Residence Trust and Barbara Aronson IRA v. Thomas Ratcliffe, Esq. et al.*, Civil Action No. STCV 23-2510 in the state court of Chatham County.
- v. The term “Bankruptcy Action” shall the bankruptcy proceeding pending in United States Bankruptcy Court for the Southern District of Georgia, *In re: Master Lending Group, LLC* (23-450569-EJC).
- vi. The term “Plaintiff” shall mean the Plaintiff in the Litigation, Barbara Aronson, individually and as the representative of the Aronson Family Residence Trust and Barbara Aronson IRA.

L. If You claim privilege as to some or all of the documents requested by any document request, it is requested that You serve upon the undersigned counsel, on the date fixed for responding to the document requests, Your written objections identifying: (a) the legal ground for the claimed privilege; (b) a description of the general topic of the document claimed to be privileged; and (c) the facts upon which such claim is based, to the extent possible in a manner consistent with the claimed privilege. You shall also set forth (d) the title and general nature of the document (e.g., letter, memorandum, etc.); (e) the general

subject matter of the document; (f) the date of the document's preparation; and (g) the length of the document. You shall also identify (h) the person(s) who authored, prepared or signed such document; and (i) the person(s) to whom the document was directed, to whom a copy was shown to be sent or who received the document, or had access to the original or any copy.

**M.** If You object to any part of any request and refuse to answer that part, state Your objection and respond to the remaining portion of that request. If You object to the scope or time period of a request and refuse to answer for that scope or time period, state Your objection and respond to the remaining portion of that request for the scope or time period You believe is appropriate.

**N.** If any of the following requests cannot be responded to in full after exercising due diligence to secure the documents, so state and respond to the extent possible, specifying Your inability to answer the remainder and identifying whatever information or documents You have concerning the unanswered portions. If Your response is qualified in any particular way, please set forth the details of such qualification.

**O.** If You contend that any of the documents responsive to these requests are confidential or proprietary, counsel for the Defendant Truist is willing to confer regarding an appropriate confidentiality agreement and/or protective order.

### **REQUESTS FOR PRODUCTION**

**Request for Production No. 1:** Produce a copy of Master Lending's articles of incorporation, operating agreement and any other documents evidencing Master Lending's ownership, membership, and corporate form.

**Request for Production No. 2:** To the extent not requested in Request Number 1 above, produce any document evidencing Master Lending's business purpose.

**Request for Production No. 3:** To the extent not requested in Request Number 1 above, produce documents sufficient to identify the members and managers of Master Lending.

**Request for Production No. 4:** Produce all documents evidencing or showing any transfer of funds, receipt of funds, or payment of funds between Master Lending, on the one hand, and Plaintiff, on the other.

**Request for Production No. 5:** Produce all documents evidencing or showing any transfer of funds, receipt of funds, or payment of funds between Master Lending, on the one hand, and Mr. Hirsch, on the other.

**Request for Production No. 6:** Produce all documents evidencing or showing any transfer of funds, receipt of funds, or payment of funds between Master Lending, on the one hand, and Hirsch & Tucker, on the other.

**Request for Production No. 7:** Produce all documents that constitute or refer to Your books, records, or other memoranda of business or financial conduct, activities, status, or income as it relates to any investments made by Plaintiff and/or any individual or entity who has made a claim in the Bankruptcy Action.

**Request for Production No. 8:** Produce all documents and communications sent or received between Mr. Hirsch, on the one hand, and any officer, director, employee, agent, or representative of Master Lending, on the other hand, pertaining, reflecting, or relating to any investment, loan, or transfer of funds with or between Plaintiff and Master Lending.

**Request for Production No. 9:** Produce all documents and communications sent or received between Plaintiff, on the one hand, and any officer, director, employee, agent, or representative of Master Lending, on the other hand, pertaining, reflecting, or relating to any investment, loan, or transfer of funds with or between Plaintiff and Master Lending.

**Request for Production No. 10:** Produce all documents and communications sent or received between Master Lending, on the one hand, and any officer, director, employee, agent, or representative of Hirsch & Tucker, on the other hand, pertaining, reflecting, or relating to any investment, loan, or transfer of funds with or between Plaintiff and Master Lending.

**Request for Production No. 11:** Produce all documents and communications sent or received between Master Lending, on the one hand, and Truist, on the other hand, pertaining, reflecting, or relating to any investment, loan, or transfer of funds with or between Plaintiff and Master Lending.

**Request for Production No. 12:** Produce all internal documents and communications sent or received between You, on the one hand, and any other officer, director, employee, agent, or representative of Master Lending, on the other hand, pertaining, reflecting, or relating to the subject matter of the Litigation.

**Request for Production No. 13:** To the extent not requested above, produce all documents and communications sent or received between You and any other person or entity, including but not limited to any other Defendant in the Litigation, on the other hand, pertaining, reflecting, or relating to the subject matter of the Litigation.

**Request for Production No. 14:** Produce any documents you have produced, whether voluntarily or through legal process, to any party or non-party in connection with the Bankruptcy Action.

**Request for Production No. 15:** Produce records of bank, checking, or savings accounts, credit union accounts, CDs, deposits, retainages, or similar funds, which are maintained by You, individually and/or jointly with others, including but not limited to, monthly statements, cancelled checks, deposit slips and deposit books that relates to any investments made by Plaintiff and any individual or entity who has made a claim in the Bankruptcy Action.

**Request for Production No. 16:** Produce documents identifying each business venture, whether it be a corporation, a general or limited partnership, sole proprietorship, joint venture, trust, limited



liability company, or otherwise, in which You have/had a financial interest or from which You received revenue, income, wages, commissions, distributions, dividends or other monies for the last seven years, up to and including the present, and all documents identifying the amount and source of revenue, income, or other money received from each such business venture.

**Request for Production No. 17:** Produce documents that constitute or refer to records of cash flow, income, revenue, commissions, reimbursements, or other sums of money paid to You by Plaintiff and any individual or entity who has made a claim in the Bankruptcy Action.

**Request for Production No. 18:** Produce documents referring to the name and address of persons or entities to whom You have given a financial statement.

**Request for Production No. 19:** Produce documents that constitute or refer to promissory notes given to you or held by You or in which You claimed an interest related to any investment made by Plaintiff and any individual or entity who has made a claim in the Bankruptcy Action.

**Request for Production No. 20:** Produce documents that constitute the basis for forensic accounting report that was created for the Bankruptcy Proceeding.

**Request for Production No. 21:** Produce documents referring to debts owed by You or to You, including account name(s), original amount, person or entity to whom due, balance owing, payments, maturity and collateral related to any investments made by Plaintiff and any individual or entity who has made a claim in the Bankruptcy Action.

**Request for Production No. 22:** Produce any documents referring to insurance payments due to You for the last seven years.

**Request for Production No. 23:** Produce all correspondence between You and accountants, financial planners, tax preparers, business partners, or banks related to any investments made by Plaintiff and any individual or entity who has made a claim in the Bankruptcy Action.

**Request for Production No. 24:** Produce any documents referring to other assets You have owned or claimed an interest in not produced pursuant to a previous request for production that relate to any investments made by Plaintiff and/or any individual or entity who has made a claim in the Bankruptcy Action.

Respectfully submitted this 19th day of November, 2024.

**BRADLEY ARANT BOULT CUMMINGS LLP**

 ERIC J. BADIA

Nancy H. Baughan  
Georgia Bar No. 042575  
Alexis Buese (*pro hac* admission pending)  
Erik J. Badia  
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Promenade Tower  
1230 Peachtree Street NE, 20<sup>th</sup> Floor  
Atlanta, GA 30309  
(404) 868-2013  
(404) 868-2010 (Facsimile)

**MCCORKLE, JOHNSON & MCCOY, LLP**

Mathew M. McCoy  
Georgia Bar No. 486273  
[mmm@mccorklejohnson.com](mailto:mmm@mccorklejohnson.com)

319 Tattnall Street  
Savannah, GA 31401  
(912) 232-6000

*Counsel for Defendant Truist Bank*

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA

Case No. \_\_\_\_\_

BARBARA ARONSON, individually and as  
the representative of the Aronson Family  
Residence Trust and Barbara Aronson IRA,

Plaintiff,

vs

THOMAS RATCLIFFE, ESQ., Administrator  
Of the Estate of Gregory Hirsch, deceased;  
HIRSCH & TUCKER, LLC; and TRUIST BANK,

Defendants.

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**SUBPOENA DUCES TECUM**

**THE STATE OF FLORIDA:**

TO: Master Lending Group, LLC  
c/o Bankruptcy Trustee Tiffany E. Caron, Esq.  
215 Pilgrim Road  
West Palm Beach, FL 33405

YOU ARE COMMANDED to produce/deliver said documents to the law office of Bradley Arant Boult Cummings LLP, c/o Nancy H. Baughan, Esq., Promenade Tower, 19th Floor, 1230 Peachtree Street NE, Atlanta, GA 30309. The following documents are hereby subpoenaed:

See attached Subpoena for Production of Documentary Evidence enclosed herewith.

These items will be inspected and may be copied at that time. You will not be required to surrender the original items. You may comply with this subpoena by providing legible copies of the items to be produced to the attorney whose name appears on this subpoena on or before the scheduled date of production. You may condition the preparation of the copies upon the payment in advance of the reasonable cost of preparation. You may mail or deliver the copies to the attorney whose name appears on this subpoena and thereby eliminate your appearance at the time and place specified above. You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the attorney whose name appears on this subpoena. THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.

If you fail to:

- (1) appear as specified; or
- (2) furnish the records instead of appearing as provided above; or
- (3) object to this subpoena,

you may be in contempt of court. You are subpoenaed to appear by the following attorney, and unless excused from this subpoena by this attorney or the court, you must respond to this subpoena as directed:

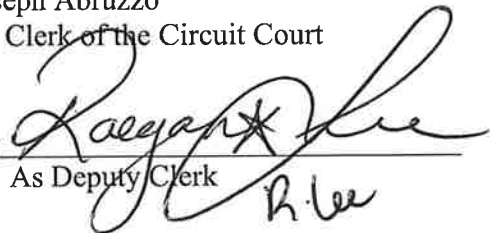
Jacob B. Hanson  
Attorney for Defendant Truist Bank  
1001 Water Street, Suite 1000  
Tampa, FL 33602  
[jhanson@bradley.com](mailto:jhanson@bradley.com)  
Bar No. 91453

DATED on

11/27/2024



Joseph Abruzzo  
As Clerk of the Circuit Court

By   
As Deputy Clerk

Cc:

Brent J. Savage, Esq.  
Lezlie Hatcher, Esq.  
Savage, Turner, Pinckney, Savage & Spouse  
102 E. Liberty Street, 8th Floor  
Savannah, GA 31412  
[bsavage@savagelawfirm.net](mailto:bsavage@savagelawfirm.net)  
[lhatcher@savagelawfirm.net](mailto:lhatcher@savagelawfirm.net)  
*Counsel for Plaintiff*

William S. Mann, Esq.  
Bubba Dunn, Esq.  
Hall Booth Smith, P.C.  
3528 Darien Highway, Suite 300  
Brunswick, GA 31525  
[wmann@hallboothsmith.com](mailto:wmann@hallboothsmith.com)  
[bdunn@hallboothsmith.com](mailto:bdunn@hallboothsmith.com)  
*Counsel for Defendant Thomas Ratcliff, Esq., Administrator  
of the Estate of Gregory Hirsch and Hirsch & Tucker, LLC*

**IN THE STATE COURT OF CHATHAM COUNTY**

133 Montgomery Street, Room 501, Savannah, GA 31401

www.statecourt.org · Ph (912) 652-7224 · FAX (912) 652-7229 · clerk@statecourt.org

**SUBPOENA FOR PRODUCTION OF DOCUMENTARY EVIDENCE**

TO:

**Master Lending Group, LLC**  
C/O Bankruptcy Trustee Tiffany E. Caron, Esq.  
215 Pilgrim Rd.  
West Palm Beach, FL 33405

**Barbara Aronson**

*Plaintiff*

**Thomas Ratcliffe, Esq., et al.**

*Defendant*

Case Number: **STCV 23-02510**

You are hereby required to be and appear at the State Court of Chatham County, Georgia before the Honorable, \_\_\_\_\_ Judge of the State Court of Chatham County, in Courtroom \_\_\_\_\_ of the Chatham County Courthouse at \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ and to bring with you into said Court certain documents to be used as evidence in the above styled case pending in the State Court of Chatham County **OR** deliver said documents to the law office of:

**Bradley Arant Boulton Cummings, LLP**, C/O Nancy H. Baughan, Esq.  
Promenade Tower, 19th Floor, Atlanta GA 30309

The following documents are hereby subpoenaed:

**See attached Request for Production of Documents**

Herein fail not, under penalty of law.

Witness the Honorable Judges of State Court of Chatham County, Georgia this day of \_\_\_\_\_ 20 .



David A. Wood, Clerk of Court  
State Court of Chatham County, Georgia

/s/ Deone Wilson

By: valid upon signature of a deputy clerk  
Deputy Clerk, State Court

If you have questions contact

Nancy H. Baughan, Esq.  
**Bradley Arant Boulton Cummings, LLP**  
Promenade Tower, 19th Floor  
Atlanta GA 30309  
(404) 868 2004 / nbaughan@bradley.com

**IN THE SUPERIOR COURT OF CHATHAM COUNTY  
STATE OF GEORGIA**

BARBARA ARONSON, individually and as  
the representative of the Aronson Family  
Residence Trust and Barbara Aronson IRA,

Plaintiff,

v.

Civil Action No. STCV 23-02510

THOMAS RATCLIFFE, ESQ., Administrator  
of the Estate of Gregory Hirsch, deceased;  
HIRSCH & TUCKER, LLC; and TRUIST  
BANK;

Defendants.

**DEFENDANT TRUIST BANK’S SECOND REQUESTS FOR PRODUCTION  
TO NON-PARTY MASTER LENDING GROUP, LLC**

To: **Master Lending Group, LLC**  
C/O Bankruptcy Trustee for Master Lending Group, LLC – Tiffany E. Caron, Esq.  
215 Pilgrim Rd.  
West Palm Beach, FL 33405

Pursuant to O.C.G.A. §§ 9-11-26 and 9-11-34, Defendant Truist Bank (“Truist”) hereby requests that Master Lending Group, LLC (“Master Lending”) produce to Defendant in the above-styled matter Truist Bank (“Truist”) the documents requested below that are in the possession, custody, or control of Mater Lending within 30 days from the date of service of these discovery requests. Responsive documents shall be produced to Nancy Baughan, Bradley Arant Boult Cummings LLP, Promenade Tower, 19th Floor, 1230 Peachtree Street NE, Atlanta, GA 30309. These Requests shall be deemed to be continuing and Master Lending is under a duty to update all responses as required by law.

**Introduction, Definitions, and Instructions**

A. As used herein, the terms “Master Lending,” “you,” and “your” refers without limitation to Master Lending Group, LLC, along with any attorneys, agents, employees,

representatives, or other persons acting or purporting to act in any manner for or on its behalf.

- B.** As used herein, the term “Truist” shall mean defendant Truist Bank, successor by merger to SunTrust Bank, and includes Truist’s predecessor, SunTrust Bank, and their employees, attorneys, agents, and all persons acting on their behalf.
- C.** As used herein, the term “Mr. Hirsch” shall mean Gregory Hirsch, member of Wallin Street.
- D.** As used herein, the term “Aronson” shall mean the Plaintiff in the above-styled action, Barbara Aronson, individually and as the representative of the Aronson Family Residence Trust and Barbara Aronson IRA.
- E.** As used herein, the term “Hirsch & Tucker, LLC” shall mean defendant in the above-styled action Hirsch & Tucker, LLC, its employees, attorneys, agents, and all persons acting on its behalf.
- F.** As used herein, the term “Master Lending” or “Master Lending Group, LLC” shall mean, Master Lending Group, LLC, its employees, attorneys, agents, and all persons acting on its behalf, including but not limited to Gregory Hirsch.
- G.** The term “person” or “persons” shall mean any individual, entity of any kind, corporation, joint venture, partnership, association, or any other association of individuals or entities.
- H.** As used herein, the word “document” is defined pursuant to the broadest definition permitted, in whatever form and however and by whomever made. The word “document” means any writing or other tangible thing, or any other thing or electronic medium on which information is stored or recorded or from which information can be retrieved, and is in your possession, custody, or control, or your agents, and all persons acting on your behalf. This specifically includes, without limitation, all writings or other written materials and all other

physical objects, all correspondence, letters, envelopes, certified mail receipts, facsimiles, telegrams, memoranda, handwritten notes, diaries, personal organizers, personal calendars, contracts, agreements, understandings, drafts, papers, periodicals, pamphlets, reports, statements, invoices, receipts, financial records, canceled checks (front and back), deposit slips, bank statements, accounts, journals, ledger cards, profit and loss statements, financial statements, audited and unaudited reports, audits, studies, working papers, corporate minutes, minute books, deeds, charts, indexes, data sheets, data processing cards, tapes, video tapes, photographs, films, sound recordings, or any other physical object however produced or reproduced in your actual or constructive possession, custody, or control or that of your employees, agents, or attorneys. Additionally, the term “document” or “documents” specifically includes any electronically stored documents, messages, or other information, whether stored on computer databases, electronic mail (*i.e.* e-mail), social media platforms (*e.g.* Facebook, Twitter, Instagram, etc.), mobile phone applications, or otherwise.

- I. The terms “communication” or “communications” as used herein mean any oral, written, or electronic transmittal of information or request for information made from one person to another person, whether made in person, electronically, by telephone or cellular phone, or by any other means and includes any document made for the purpose of recording a communication, a fact, an idea, a statement, an inquiry, an opinion, a belief or otherwise.
- J. As used herein, the singular shall include the plural, and the plural shall include the singular. The conjunctive “and” shall include the disjunctive “or,” and the disjunctive “or” shall include the conjunctive “and.”
- K. As used herein, the following terms have the meanings designated below:



- i. The term “Complaint” shall mean the Complaint filed by Plaintiff in the above-styled action on or about December 14, 2023.
- ii. The term “FAC” shall mean that First Amended Complaint filed by Plaintiff in the above-styled action on or about March 13, 2024.
- iii. The term “SAC” shall mean that Second Amended Complaint filed by Plaintiff in the above-styled action on or about June 7, 2024.
- iv. The term “Litigation” shall mean the above-styled action, captioned *Barbara Aronson, individually and as the representative of the Aronson Family Residence Trust and Barbara Aronson IRA v. Thomas Ratcliffe, Esq. et al.*, Civil Action No. STCV 23-2510 in the state court of Chatham County.
- v. The term “Bankruptcy Action” shall the bankruptcy proceeding pending in United States Bankruptcy Court for the Southern District of Georgia, *In re: Master Lending Group, LLC* (23-450569-EJC).
- vi. The term “Plaintiff” shall mean the Plaintiff in the Litigation, Barbara Aronson, individually and as the representative of the Aronson Family Residence Trust and Barbara Aronson IRA.

L. If You claim privilege as to some or all of the documents requested by any document request, it is requested that You serve upon the undersigned counsel, on the date fixed for responding to the document requests, Your written objections identifying: (a) the legal ground for the claimed privilege; (b) a description of the general topic of the document claimed to be privileged; and (c) the facts upon which such claim is based, to the extent possible in a manner consistent with the claimed privilege. You shall also set forth (d) the title and general nature of the document (e.g., letter, memorandum, etc.); (e) the general

subject matter of the document; (f) the date of the document's preparation; and (g) the length of the document. You shall also identify (h) the person(s) who authored, prepared or signed such document; and (i) the person(s) to whom the document was directed, to whom a copy was shown to be sent or who received the document, or had access to the original or any copy.

**M.** If You object to any part of any request and refuse to answer that part, state Your objection and respond to the remaining portion of that request. If You object to the scope or time period of a request and refuse to answer for that scope or time period, state Your objection and respond to the remaining portion of that request for the scope or time period You believe is appropriate.

**N.** If any of the following requests cannot be responded to in full after exercising due diligence to secure the documents, so state and respond to the extent possible, specifying Your inability to answer the remainder and identifying whatever information or documents You have concerning the unanswered portions. If Your response is qualified in any particular way, please set forth the details of such qualification.

**O.** If You contend that any of the documents responsive to these requests are confidential or proprietary, counsel for the Defendant Truist is willing to confer regarding an appropriate confidentiality agreement and/or protective order.

### **REQUESTS FOR PRODUCTION**

**Request for Production No. 1:** Produce all documents relating to any proposed or finalized settlement agreement between Master Lending (whether directly or through its Trustee in the Bankruptcy Action) and any individual or entity who has made a claim in the Bankruptcy Action, including, but not limited to, any correspondence regarding same, and any settlement agreements, whether finalized or drafts.

**Request for Production No. 2:** Produce all documents relating to any proposed or finalized settlement agreement between Master Lending (whether directly or through its Trustee in the Bankruptcy Action) and any individual or entity related to the claims at issue in this Litigation (including any claims that Master Lending was operating a Ponzi Scheme), including, but not limited to, any correspondence regarding same, and any settlement agreements, whether finalized or drafts.

**Request for Production No. 3:** Produce copies of all life insurance policies owned by Master Lending, Gregory M. Hirsch, or life insurance policies insured on the life of Gregory M. Hirsch.

**Request for Production No. 4:** Produce all documents relating to any insurance policies owned by Master Lending, Gregory M. Hirsch, or life insurance policies insured on the life of Gregory M. Hirsch.

**Request for Production No. 5:** Produce copies of all life insurance policies in which Master Lending is a beneficiary.

**Request for Production No. 6:** Produce all documents relating to any insurance policies in which Master Lending is a beneficiary.

Respectfully submitted this 21st day of November, 2024.

**BRADLEY ARANT BOULT CUMMINGS LLP**

/s/ Nancy H. Baughan

Nancy H. Baughan  
Georgia Bar No. 042575  
Alexis Buese (*pro hac* admission pending)  
Erik J. Badia  
Georgia Bar No. 327905  
nbaughan@bradley.com  
abuese@bradley.com  
ebadia@bradley.com

Promenade Tower  
1230 Peachtree Street NE, 20<sup>th</sup> Floor  
Atlanta, GA 30309

(404) 868-2013  
(404) 868-2010 (Facsimile)

**MCCORKLE, JOHNSON & MCCOY, LLP**

Mathew M. McCoy  
Georgia Bar No. 486273  
[mmm@mccorklejohnson.com](mailto:mmm@mccorklejohnson.com)

319 Tattnall Street  
Savannah, GA 31401  
(912) 232-6000

*Counsel for Defendant Truist Bank*

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
SAVANNAH 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>	)	
_____	)	

**ORDER FOR PRODUCTION OF DOCUMENTS**  
**PURSUANT TO BANKRUPTCY RULE 2004**

Upon consideration of the *Motion for Production of Documents Pursuant to Bankruptcy Rule 2004* (the “Motion”) filed by Truist Bank (“Truist”),

IT IS HERBY ORDERED that Truist is authorized to release certain banking records of the Debtor, which are described in the Motion’s **Exhibit 1**, to the Plaintiff (as defined in the Motion) in the Litigation (as defined in the Motion).

IT IS FURTHER ORDERED that the Chapter 7 Trustee in this case is authorized and directed to produce to Truist certain records of the Debtor and of Hirsch & Tucker (as defined in the Motion) described in the Motion’s **Exhibit 2**, on or before January 9, 2025, at Truist’s counsel’s offices at 1230 Peachtree Street NE, 20th Floor, Atlanta, Georgia 30309, or some other mutually agreeable time and place, for review by counsel for Truist.

IT IS FURTHER ORDERED that Truist shall bear all reasonable, actual and necessary out-of-pocket expenses of compiling and copying the information to be produced by the Trustee pursuant to this Order.

**END OF DOCUMENT**

Prepared by:

Nancy H. Baughan  
Georgia Bar No. 04275  
BRADLEY ARANT BOULT CUMMINGS LLP  
Promenade Tower  
1230 Peachtree Street NE  
20th Floor  
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Mathew M. McCoy  
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(912) 232-6000

*Counsel for Defendant Truist Bank*