

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

In Re:

ProCom America, LLC,
d/b/a Beyond Band of Brothers,
d/b/a BBOB,

Case No.: 8:20-bk-03522-MGW
Chapter 7 Case

Debtor.

_____ /

TRUSTEE’S MOTION FOR CIVIL CONTEMPT AND SANCTIONS

Douglas N. Menchise, as Chapter 7 Trustee (“Trustee”), hereby moves to compel examination testimony and document production from, and for sanctions against, Mr. Peter Gaal (“Gaal”), ProCom America, LLC (the “Debtor”), ProCom Tours, LLC (“ProCom Tours”), Procom Consulting Utazasi IRODA, KFT (“PCU”); Procom Investments, KFT (“Procom Investments”); Procom Consulting, KFT (“Procom Consulting”) (collectively, “ProCom Examinees”) (the “Motion”), and states as follows:

SUMMARY OF REQUESTED RELIEF

1. The ProCom Examinees have yet again refused to appear for Rule 2004 Examinations, scheduled by agreement with their counsel. The latest actions of the ProCom Examinees in refusing to appear for duly noticed examinations on September 12 and 13, 2022, is the culmination of extraordinary and concerted efforts to obstruct justice, refusing to comply with discovery and production of documents, all of which constitutes a flagrant disregard of this Court's clear, but thus far restrained, direction and orders.

2. This conduct is directly contumacious and necessitates sanctions. *See, e.g., In re Steffen*, 406 B.R. 139 (Bankr. M.D. Fla. 2009). Consistent with this Court’s Order Granting in

Part and Deferring in Part Trustee’s Motion to Compel Rule 2004 Examinations, [ECF No. 426], this Court should hold the Procom Examinees in civil contempt, and impose sanctions against the Procom Examinees, including (a) daily monetary sanctions, including compensatory and coercive sanctions; (b) issuance of an international bench warrant for each of the Procom Examinees; (c) confinement until the Procom Examinees comply with the applicable Orders of this Court; (d) an award of attorneys’ fees and costs in attempting to obtain the Procom Examinees’ compliance with Rule 2004 discovery; and (e) such further and other sanctions as the Court deems appropriate.

3. In the alternative, the Trustee requests this Court strike all pleadings filed by the ProCom Examinees in this case and in all pending adversary proceedings in which any of the ProCom Examinees are a party, and render a default judgment against such parties in all appropriate proceedings, so that the Trustee may begin enforcement proceedings.

BACKGROUND

4. On May 1, 2020 (the “Petition Date”), a petition for an involuntary bankruptcy case was filed under Section 303 of Title 11 of the United States Code [ECF No. 1]. A summons was issued thereafter. [ECF No. 5].

5. Upon consent of the parties-in-interest, the Court entered an Order for Relief on May 8, 2020. [ECF Nos. 7–9].

6. Douglas N. Menchise was appointed as the Chapter 7 Trustee in this matter. [ECF No. 10]. The Trustee subsequently employed, with approval of this Court, the undersigned counsel as his special counsel. [ECF Nos. 93, 97].

7. After Gaal and his companies stole more than \$10,000,000 from elderly individuals who were defrauded into purchasing WWII-themed travel packages from a business Gaal and his companies established in the United States using United States laws and protections, he fled the

United States and is a fugitive from justice.

8. Since April 29, 2021, the Trustee has sought turnover of documents and testimony from Gaal and corporate representatives of the Debtor and ProCom Tours, pursuant to Rule 2004. *See* [ECF No. 260]. The ProCom Examinees have failed to comply whatsoever, despite this Court granting motions to compel. The ProCom Examinees have willfully ignored and flouted this Court's orders and authority, and fought the Trustee at every turn.

9. Specifically, on June 1, 2021, the Trustee filed his Motion to Compel Rule 2004 Examinations *Duces Tecum*, which was granted on June 10, 2021. [ECF Nos. 263, 265]; *see also* [ECF No. 272] (requesting reconsideration of this Court's Order by Gaal); [ECF No. 354] (holding that the Trustee's service to Gaal's attorney was sufficient and compelling Gaal to appear for a Rule 2004 examination within 45 days); [ECF No. 357] (denying Gaal's motion for reconsideration).

10. On June 21, 2021, the Trustee re-noticed his Omnibus Notice of Taking Rule 2004 Examinations *Duces Tecum* to occur on July 20, 2021, and July 21, 2021, with respect to the ProCom Examinees. [ECF No. 269]. On August 5, 2021, the Trustee issued subpoenas to third parties Kevin E. Riggs, [ECF No. 290], and Renaissance Consulting & Development, LLC, [ECF No. 291], each of whom provided services to the Debtor. Unsurprisingly, Gaal sought to quash those subpoenas and prevent testimony and production of documents related to the Debtor. [ECF No. 295].

11. The Trustee later sought to compel Riggs and Renaissance Consulting to turnover and produce all property of the estate, including business records, and to produce tax records relating to the Debtor's business activity and income tax paid for Gaal and his affiliate companies. [ECF No. 312].

12. This Court rejected Gaal's attempt to stymie the Trustee's discovery requests, granting the motion to compel and denying Gaal's motion to quash. [ECF No. 338].

13. After this Court rendered its opinion on the propriety of the Trustee's service of Gaal and his entities via counsel, [ECF No. 354], Gaal filed a Motion for Leave to Appeal this Court's interlocutory discovery order(s), [ECF No. 361–63].

14. On April 5, 2022, the Trustee noticed—for the third time—the examinations of the ProCom Examinees to occur on May 3, 2022, and May 4, 2022. [ECF No. 364]. The Trustee attempted to coordinate dates for the Rule 2004 examination with Gaal's counsel, but did not receive a timely response.

15. On April 5, 2022, and April 6, 2022, Gaal sought a protective order to stay his obligation to appear at the Rule 2004 Examination while his interlocutory appeal was pending in the District Court. [ECF Nos. 365, 368]. Therein, and in separate communications, Gaal's counsel invoked the pending proceeding rule as both a sword and a shield.

16. On April 20, 2022, this Court again denied Gaal's motions and ordered Gaal to appear at the 2004 examination as noticed. [ECF No. 385]. In the adversary proceeding filed against Gaal, Adv. 22-00041, this Court rendered a related order on April 27, 2022, stating that the Trustee could notice a Rule 2004 examination, which would not be limited by the pending proceeding rule. [Adv. 22-0041, ECF No. 10].

17. On April 29, 2022, the District Court dismissed Gaal's appeal. [ECF No. 389].

18. On July 7, 2022, the Trustee filed an Amended Omnibus Notice of the examination of the ProCom Examinees, which was subsequently amended for technical issues. [ECF Nos. 399, 402–03].

19. Since Gaal is a Hungarian citizen, the examinations were next to occur on July 11, 2022, and July 22, 2022, via Zoom videoconference from the Trustee's Hungarian local counsel's office in Budapest, Hungary. *Id.*

20. After engaging local counsel in Budapest, engaging two interpreters, coordinating in-person facilities for the taking of the examination, and coordinating with a United States court reporter familiar with Hungarian accents, on July 11, 2022, the Trustee appeared for the duly noticed examination, but the ProCom Examinees failed to appear, refusing to comply with this Court's orders.

21. On July 14, 2022, the Trustee filed an Expedited Motion to Compel Examination Testimony from and for Sanctions against the ProCom Examinees. [ECF No.405]. At a hearing on July 29, 2022, this Court granted the motion, and, as further reflected in the written order entered on September 14, 2022, ordered Gaal and the corporate representatives of Procom America and Procom Tours to appear for their 2004 examinations within 60 days of the hearing, failing which this Court would consider

whether to hold the [Procom Examinees] in civil contempt and, if so, whether to impose sanctions against the Examinee, including:

- a. monetary sanctions, including compensatory or coercive sanctions;
- b. the issuance of an international bench warrant for the Rule 2004 Examinee; or
- c. confinement of the Rule 2004 Examinee until the Rule 2004 Examinee complies with the applicable Orders of this Court.

[ECF No. 426].

22. Subsequent to the July 29, 2022 hearing and Court's oral ruling, the Trustee's counsel coordinated via email with counsel or Gaal and counsel for Procom America and Procom

Tours, and all parties agreed upon dates for the yet again continued ProCom Examinees' Rule 2004 Examinations [See attached **Exhibit A**].

23. On August 23, 2022, the Trustee filed his fifth amended omnibus notice of the examination of the ProCom Examinees, to occur on September 12, 2022 and September 13, 2022, dates which the ProCom Examinees' counsel provided to the Trustee for such examination. [ECF No. 422] [See **Exhibit B**, attached hereto].

24. The agreed set of examinations were again to occur via Zoom videoconference from the Trustee's Hungarian local counsel's office in Budapest, Hungary, in accordance with this Court's July 29, 2022 ruling.

25. On September 2, 2022, the Trustee's counsel received an email from the ProCom Examinees' counsel that, notwithstanding the substantial amount of judicial effort, and the coordination of dates for the examination to occur, the ProCom Examinees would nevertheless not be attending and would continue to ignore this Court's orders and authority [See **Exhibit C**, attached hereto].

BASIS FOR RELIEF

26. As set forth above and in the Trustee's initial Motion to Compel, [ECF No. 263], the ProCom Examinees have failed, for more than one year to produce documents and testify in accordance with duly notices Rule 2004 Examinations and Court's orders, and a myriad of informal discovery conferences with this Court, where this Court's suggestions and direction were most definitely unambiguous.

27. Under circumstances revealing the theft of over \$10 million of Debtor's assets by Gaal and his entities in the year leading up to the Petition Date, the ProCom Examinees continue to refuse repeated requests and to defy this Court's rulings and direction.

28. Instead of complying with their discovery obligations, the ProCom Examinees have engaged in a pitched battle against this Court, the Trustee and thousands of creditors to conceal crucial information from both the Trustee and this Court.

29. The ProCom Examinees' refusal to produce documents to and provide testimony to the Trustee, or otherwise cooperate in discovery, evinces a thorough, deep-seated, and prolific pattern of obstruction, obfuscation, hindrance, and outright interference with the Trustee's ability to gather documents belonging to the Estate and to conduct discovery in the context of the instant case and related proceedings, thereby frustrating the overall administration of this case.

30. In addressing more than a year's worth of discovery violations, this Court has patiently ascended through a progression of interim orders to attempt to coerce the ProCom Examinees to comply with their obligations under the Bankruptcy Code. [ECF Nos. 265, 338, 354, 357, 385]; *see, e.g., In re Steffen*, 406 B.R. at 144.

31. Each of those orders have not resulted in any change in the ProCom Examinees' behavior. The ProCom Examinees, assisted by their respective counsel, have only further delayed and trivialized the Trustee's efforts and this Court's orders. It is time, once again, for this Court to consider the ProCom Examinees' conduct and coerce compliance.

32. The ProCom Examinees' conduct necessitates an escalation in sanctions against both the ProCom Examinees and, as appropriate, their respective counsel. *In re Bryson*, 131 F. 3d 601 (7th Cir. 1997).

33. Consistent with this Court's Order Granting in Part and Deferring in Part Trustee's Motion to Compel Rule 2004 Examinations, [ECF No. 426], this Court should hold the Procom Examinees in civil contempt, and impose sanctions against the Procom Examinees, including (a) daily monetary sanctions, including compensatory and coercive sanctions; (b) issuance of an

international bench warrant for each of the Procom Examinees; (c) confinement until the Procom Examinees comply with the applicable Orders of this Court; (d) an award of attorneys' fees and costs in attempting to obtain the Procom Examinees' compliance with Rule 2004 discovery; and (e) such further and other sanctions as the Court deems appropriate.

34. In the alternative, the Trustee requests this Court strike all pleadings filed by the ProCom Examinees in this case and in all pending adversary proceedings in which any of the ProCom Examinees are a party, and render a default judgment against such parties in all appropriate proceedings, so that the Trustee may begin enforcement proceedings.

35. Rule 37 is illustrative in guiding how this Court may consider the ProCom Examinees' conduct. Pursuant to Rule 37, a court may grant sanctions against a party that "fails to obey an order to provide or permit discovery." Fed. R. Civ. P. 37(b).

36. Sanctions may be granted under Rule 37(b)(2) if there is noncompliance with a court order, notwithstanding a lack of willfulness or bad faith, although such factors "are relevant ... to the sanction to be imposed for the failure." See *In re Seroquel Prods. Liab. Lit.*, 244 F.R.D. 650, 656 (M.D. Fla. 2007).

37. This Court has broad discretion to fashion appropriate sanctions for the violation of discovery orders under Rule 37 and also under 11 U.S.C. § 105. *Id.* This Court may also impose sanctions for litigation misconduct under its inherent power. *Chambers v. NASCO, Inc.*, 501 U.S. 32, 43-44 (1991); *In re Sunshine Jr. Stores, Inc.*, 456 F.3d 1291, 1304 (11th Cir. 2006). The court's inherent power derives from the court's need "to manage [its] own affairs so as to achieve the orderly and expeditious disposition of cases." *Chambers*, 501 U.S. at 43 (citations omitted).

38. The ProCom Examinees and their counsel have brazenly disregarded this Court's Orders and directions and intentionally refused to cooperate in discovery, refusing to produce

documents or appear for duly noticed Rule 2004 examinations. Accordingly, the ProCom Examinees, and their counsel, should be both compelled and sanctioned accordingly.

39. Additionally, while the Trustee holds counsel for the Procom Examinees in the highest professional regard, such counsel have a role in the discovery failures. What that role they have played is presently unknown to the Trustee. What was communicated between ProCom Examinees and their respective counsel will reveal what is really occurring.

40. Thus, the Trustee additionally requests counsel for the ProCom Examinees turnover to this Court, *in camera*, copies of all written communications with their clients (including, but not limited to, letters, emails, text messaging, and other forms of electronic communication) regarding the outstanding discovery and the need to comply, as well as their clients' responses, to fully assess where fault with the contumacious conduct truly lies and to fashion appropriate sanctions.

41. Consistent with the requirements of Rules 2004-1 and 7026-1 of the Local Rules of the United States Bankruptcy Court for the Middle District of Florida, the undersigned counsel communicated with ProCom Examinees' respective counsel to determine whether they consented to relief requested herein, to wit: a finding of contempt and an order compelling attendance a Rule 2004 examination consistent with this Court's prior rulings. As of the filing of this Motion, the undersigned is unsure of ProCom Examinees' respective counsel's position.

WHEREFORE, the Trustee hereby requests this Court enter an Order (i) finding the ProCom Examinees in civil contempt; (ii) imposing daily monetary sanctions against the respective ProCom Examinees until they comply with this Court's Orders, respond to the Trustee's document requests, and appear for oral examination; (iii) issuing an international bench warrant for each of the Procom Examinees; (iv) providing for the immediate confinement of the Procom Examinees until they comply with their discovery obligations pursuant to the applicable Orders of

this Court; (v) award of attorneys' fees and costs in attempting to obtain the ProCom Examinees' compliance with Rule 2004 discovery; (vi) strike all pleadings filed by the ProCom Examinees in this case and in all pending adversary proceedings in which any of the ProCom Examinees are a party; (viii) providing sanctions against the ProCom Examinees' respective counsel based on their assistance in the ProCom Examinees' vexatious conduct under 28 U.S.C. § 1927; and (vii) granting such further and other relief this Court deems necessary and proper.

Date: September 12, 2022.

Respectfully submitted,

SHUMAKER, LOOP & KENDRICK, LLP

/s/ Steven M Berman

STEVEN M. BERMAN, ESQ.

Florida Bar No.: 856290

sberman@shumaker.com

101 E. Kennedy Blvd., Suite 2800

Tampa, Florida 33602

Phone (813) 229-7600

*Counsel for Trustee Douglas N. Menchise,
Ch. 7 Trustee*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 16, 2022, the foregoing was furnished via CM/ECF service or will by U.S. Mail on September 19, 2022, to:

Peter Gaal
c/o Lynn Welter Sherman, Esq.
Trenam Law
200 Central Avenue, Suite 1600
St. Petersburg, FL 33701

Lynn Welter Sherman, Esq.
Trenam Law
200 Central Avenue, Suite 1600
St. Petersburg, FL 33701

ProCom America, LLC
c/o Kathleen L DiSanto, Esq.
Bush Ross, P.A.
1801 North Highland Ave.
Tampa, FL 33602

Kathleen L DiSanto, Esq.
Bush Ross, P.A.
1801 North Highland Ave.
Tampa, FL 33602

ProCom Tours, LLC
c/o Kathleen L DiSanto, Esq.
Bush Ross, P.A.
1801 North Highland Ave.
Tampa, FL 33602

Procom Consulting Utazasi IRODA, KFT c/o
Kathleen L DiSanto, Esq.
Bush Ross, P.A.
1801 North Highland Ave.
Tampa, FL 33602

Procom Investments, KFT
c/o Kathleen L DiSanto, Esq.
Bush Ross, P.A.
1801 North Highland Ave.
Tampa, FL 33602

Procom Consulting, KFT
c/o Kathleen L DiSanto, Esq.
Bush Ross, P.A.
1801 North Highland Ave.
Tampa, FL 33602

Procom America, LLC
400 N. Ashley Drive
Suite 1010
Tampa, FL 33602

/s/ Steven Berman
Steven M. Berman, Esq.

From: [Lynn W. Sherman](#)
To: [Gasaway, Brandy](#); [Berman, Steven M.](#); "Kathleen L. DiSanto"
Cc: "[Elgidely, Robert F.](#)"; "[David C. Cimo \(dcimo@cmmlawgroup.com\)](#)"; "[Douglas N. Menchise](#)"; [Ballentine, Andrew S.](#); [Figueroa, Rosa I.](#); [Tanya A. Yatsco](#)
Subject: RE: Meet and Confer
Date: Wednesday, August 3, 2022 10:10:37 AM
Attachments: [image005.png](#)
[image006.png](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

CAUTION: External Email

Brandy,

September 12 and 13 is the first consecutive two day block that works for my client, Kathleen, and me. By providing dates, Mr. Gaal is not waiving any objections to service or the Rule 2004 examinations, all of which are expressly preserved.

Lynn



LYNN W. SHERMAN | ATTORNEY

Dir: 727-820-3980 | Fax: 727-820-3974 | [email](#) | [vcard](#) | [bio](#)

200 Central Avenue, Suite 1600, St. Petersburg, FL 33701

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From: Lynn W. Sherman
Sent: Wednesday, August 3, 2022 8:53 AM
To: Gasaway, Brandy <bgasaway@shumaker.com>; Berman, Steven M. <sberman@shumaker.com>; Kathleen L. DiSanto <kdisanto@bushross.com>
Cc: Elgidely, Robert F. <RElgidely@foxrothschild.com>; David C. Cimo (dcimo@cmmlawgroup.com) <dcimo@cmmlawgroup.com>; Douglas N. Menchise <dmenchise@verizon.net>; Ballentine, Andrew S. <asballentine@shumaker.com>; Figueroa, Rosa I. <rfigueroa@shumaker.com>
Subject: RE: Meet and Confer

Brandy,

We are working to coordinate dates on our end and should have a response by the end of the day today.

Lynn



LYNN W. SHERMAN | ATTORNEY

Dir: 727-820-3980 | Fax: 727-820-3974 | [email](#) | [vcard](#) | [bio](#)

200 Central Avenue, Suite 1600, St. Petersburg, FL 33701

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From: Gasaway, Brandy <bgasaway@shumaker.com>

Sent: Wednesday, August 3, 2022 8:20 AM

To: Berman, Steven M. <sberman@shumaker.com>; Lynn W. Sherman <LSherman@trenam.com>; Kathleen L. DiSanto <kdisanto@bushross.com>

Cc: Elgidely, Robert F. <RElgidely@foxrothschild.com>; David C. Cimo (dcimo@cmmlawgroup.com) <dcimo@cmmlawgroup.com>; Douglas N. Menchise <dmenchise@verizon.net>; Ballentine, Andrew S. <asballentine@shumaker.com>; Figueroa, Rosa I. <rfigueroa@shumaker.com>

Subject: RE: Meet and Confer

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you know the content is safe.

Good morning,

I am reaching out to follow up on available dates. If you can please advise as soon as possible, so we can place holds on the dates and prepare notices for filing.

Thank you,
Brandy

Brandy Gasaway

Legal Administrative Assistant
to Steven M. Berman and Andrew S. Ballentine



Bank of America Plaza, Suite 2800

101 East Kennedy Boulevard | Tampa, FL 33602

Direct [813.676.7234](tel:813.676.7234) | Fax [813.229.1660](tel:813.229.1660)

bgasaway@shumaker.com

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From: Berman, Steven M. <sberman@shumaker.com>

Sent: Friday, July 29, 2022 11:14 AM

To: Lynn W. Sherman <LSherman@trenam.com>; Kathleen L. DiSanto <kdisanto@bushross.com>

Cc: Elgidely, Robert F. <RElgidely@foxrothschild.com>; David C. Cimo (dcimo@cmmlawgroup.com) <dcimo@cmmlawgroup.com>; Douglas N. Menchise <dmenchise@verizon.net>; Ballentine, Andrew S. <asballentine@shumaker.com>; Figueroa, Rosa I. <rfigueroa@shumaker.com>; Gasaway, Brandy <bgasaway@shumaker.com>

Subject: Meet and Confer

Lynn and Kathleen

Please provide me all dates you and your clients are available in the month of August. We will use 2 consecutive days to start for the exams of:

1. Peter Gaal,
2. Procom America,
3. Procom Investments, KFT,
4. Procom Consulting, KFT,
5. Procom Consulting Utazasi IRODA, KFT, and
6. Procom Tours.

These are the entities noticed up on April 29, 2021.

Please let me know by close of business on Monday so we can notice them up.

Thanks

Steve

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

In Re:

ProCom America, LLC
d/b/a Beyond Band of Brothers,
d/b/a BBOB,

Case No.: 8:20-03522-MGW
Chapter 7 Case

Debtor.

**AMENDED CHAPTER 7 TRUSTEE, DOUGLAS N. MENCHISE'S, FIFTH OMNIBUS
NOTICE OF TAKING RULE 2004 EXAMINATIONS *DUCES TECUM***

PLEASE TAKE NOTICE that DOUGLAS N. MENCHISE (the "Trustee"), as Chapter 7 Trustee of the bankruptcy estate of PROCOM AMERICA, LLC, d/b/a Beyond Band of Brothers, d/b/a BBOB (the "Debtor"), by counsel, will examine the following person(s), under oath, on the date(s) and at the time(s) and location(s) set forth below pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure:

DEPONENT	DATE/TIME	PLACE
Mr. Peter Gaal, individually c/o Lynn W. Sherman, Esq. Trenam Kemker Law Firm 200 Central Avenue, Suite 1600 St. Petersburg, FL 33701	September 12-13, 2022 At 8:30 a.m. EST each day	Via Zoom (see below)
Fed. R. Civ. P. 30(b)(6) Corporate representative(s) of Procom Tours, LLC , who is designated to provide binding testimony on its behalf with respect to the subject matters set forth on Schedule A(II) attached hereto. c/o Lynn W. Sherman, Esq.	September 12-13, 2022 Immediately Following Examination of Peter Gaal.	Via Zoom (see below)

¹ To amend the Zoom link information

<p>Fed. R. Civ. P. 30(b)(6) Corporate representative(s) of Procom America, LLC who is designated to provide binding testimony on its behalf with respect to the subject matters set forth on Schedule A(II) attached hereto. c/o Lynn W. Sherman, Esq.</p>	<p>September 12-13, 2022 Immediately Following Examination of Corporate representative(s) of Procom Tours, LLC.</p>	<p>Via Zoom (see below)</p>
<p>Fed. R. Civ. P. 30(b)(6) Corporate representative(s) of Procom Consulting Utazasi IRODA, KFT, who is designated to provide binding testimony on its behalf with respect to the subject matters set forth on Schedule A(II) attached hereto.</p>	<p>September 12-13, 2022 Immediately Following Examination of Corporate representative(s) of Procom America, LLC</p>	<p>Via Zoom (see below)</p>
<p>Fed. R. Civ. P. 30(b)(6) Corporate representative(s) of Procom Investments, KFT, who is designated to provide binding testimony on its behalf with respect to the subject matters set forth on Schedule A(II) attached hereto.</p>	<p>September 12-13, 2022 Immediately Following Examination of Corporate representative(s) of Procom Consulting IRODA, KFT</p>	<p>Via Zoom (see below)</p>
<p>Fed. R. Civ. P. 30(b)(6) Corporate representative(s) of Procom Consulting, KFT, who is designated to provide binding testimony on its behalf with respect to the subject matters set forth on Schedule A(II) attached hereto.</p>	<p>September 12-13, 2022 Immediately Following Examination of Corporate representative(s) of Procom Investments, KFT</p>	<p>Via Zoom (see below)</p>

The Zoom information for the Rule 2004 Examinations:

To join a Zoom meeting from a Laptop / Mobile Phone please click here:

Meeting URL: <https://bakermckenzie.zoom.us/j/91351411583?pwd=cnI3V1gxZDBRYU5vK080ck9nMWFUQT09>

Meeting ID: 913 5141 1583

Password: 666068

The Rule 2004 Examinations may continue from day to day until completed. If the Examinee receives this Notice less than seven (7) days prior to the scheduled Rule 2004 Examination date (or less than ten (10) days if the Rule 2004 Examination is taking place outside the State of Florida), the Trustee's Rule 2004 Examination will be rescheduled to a mutually agreeable time upon timely request.

The Rule 2004 Examinations are being taken pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure. The Rule 2004 Examinations will be taken before an officer authorized to record the testimony. The scope of the Rule 2004 Examinations shall be as described in Rule 2004 of the Federal Rules of Bankruptcy Procedure. It is the Examinee's responsibility to provide and pay for a translator, if one is needed at the Rule 2004 Examination.

Pursuant to the 2004 Examination Order, the witnesses are required to produce all documents responsive to the Trustee's *duces tecum* requests attached hereto at Schedule A(III) to undersigned counsel on or before **August 30, 2022**. See [ECF Nos. 265, 415].

Date: August 23, 2022.

Respectfully submitted,

SHUMAKER, LOOP & KENDRICK, LLP

/s/ Steven M Berman

STEVEN M. BERMAN, ESQUIRE

Florida Bar No.: 856290

Primary [E-Mail: sberman@shumaker.com](mailto:sberman@shumaker.com)

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*Counsel for Trustee Douglas N. Menchise,
Ch. 7 Trustee*

-AND-

FOX ROTHSCHILD, LLP

By: /s/ Robert F. Elgidely
Robert F. Elgidely, Esq.
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relgidely@foxrothschild.com
2 South Biscayne Blvd., Suite 2750
Miami, FL 33131
Phone: (305) 442-6543
Fax: (305) 442-6541
Counsel for Trustee

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 23, 2022, the foregoing was furnished by CM/ECF notice to all counsel of record and as set forth in Limited Notice Order, [ECF No. 138].

/s/ Steven M Berman
Attorney

SCHEDULE A

I. DEFINITIONS AND INSTRUCTIONS

Unless otherwise specified, the following definitions apply to this Fifth Omnibus Notice of Taking Rule 2004 Examination *Duces Tecum* and are deemed to be incorporated into each subject listed below:

1. The term "**Communication(s)**" means any written or oral statement, dialogue, colloquialism, discussion, conversation or agreement of any kind or character, including, by way of example and without limitation, any act or instance whereby messages, facts, data or any other information is transmitted orally, visually, in writing, electronically or by any other means or media from natural person or firm to another (e.g., personal conversations, telephone conversations, letters, e-mails, meetings, memoranda, telegraphic and telex communications or transmittals of documents), any manner or form of information, memorandum or notes or message transmission, however produced or reproduced, whether by "document" as herein defined or orally or otherwise, which was distributed or circulated between or among persons, or data storage or processing units and any and all documents containing, consisting of, or relating or referring, in any way, either directly or indirectly to, a communication.

2. The terms "**concern**" or "**concerning**" means relating to, referring to, connected with, commenting on, responding to, supporting, mentioning, containing, evidencing, showing, memorializing, describing, analyzing, reflecting, comprising or constituting.

3. The term "**Debtor**" means Procom America, LLC.

4. The phrase "**Debtor Representative(s)**" means:

- (i) Peter Gaal;
- (ii) Nikoletta "Nikki" Montgomery;
- (iii) Debra Watkins; and
- (iv) any of the Debtor's officer(s), director(s), manager(s), employee(s), agent(s), or other person(s) acting or authorized to act on its behalf (past or present).

5. The term "**Document(s)**" shall have a synonymous meaning equal in scope to the usage of the term in Rule 34(a) of the Federal Rules of Civil Procedure and shall include, but shall not be limited to, the original and all drafts of all written and graphic matter, however produced or reproduced, of any kind or description, whether or not approved, signed, sent, received, re-drafted or executed, and all copies thereof which are different in any way from the original (whether by interlineation, date-stamp, notation, indication of copies sent or received, or otherwise), including, without limitation, any E-mails, paper, letter, correspondence, memoranda (including interoffice and intraoffice memoranda), notes, memoranda for files, memoranda of telephone or other conversation, announcement, bulletin, press release, newspaper or magazine article, pamphlet, circulars, advertising material, studies, analysis, statistics, surveys, drawing, sketch, schematic, chart, graph, investigation, study, working paper, summary, report, opinion, table, schedule, extract,

blueprint, portfolio, ledger, worksheet, prospectus, financial projection, financial statement, financial schedule, book, note, notation, message slip, telegram, telex and telecopier message, agreement, contract, object, record, transcript, hearing, meeting, diary, or other communication, chronological data, minutes, agendas, transcriptions, record, report, invoice, receipt, return, computer printout or other computer derived data, schedule, affidavit, cancelled check, check stub, delivery ticket, bill of lading, graph or aural records or representations of any kind, including without limitation, photographic matter, microfiche, microfilm, video-tape, motion picture and electronic, all mechanical or electronic sound recordings or transcripts thereof (including without limitation tapes, cassettes, discs and recordings) in your possession, custody, and/or control, or your agents, representatives or attorneys, unless privileged, or of which you have knowledge.

6. The phrase "**Electronic Data**" or the term "**Data**" means the original (or identical duplicate when the original is not available) and any non-identical copies (whether non-identical because of notes made on copies or attached comments, annotations, marks, transmission notations, or highlighting of any kind) of writings of every kind and description whether inscribed by mechanical, facsimile, electronic, magnetic, digital, or other means. Electronic Data includes, by way of example only, computer programs (whether private, commercial, or work-in-progress), programming notes or instructions, activity listings of electronic mail receipts and/or transmittals, output resulting from the use of any software program, including word processing documents, spreadsheets, Database files, charts, graphs and outlines, electronic mail, operating systems, source code of all types, peripheral drivers, TIF files, batch files, ASCII files, .pdf (portable document format) files, and any and all miscellaneous files and/or file fragments, regardless of the media on which they reside and regardless of whether said electronic data consists in an active file, deleted file or file fragment. Electronic Data includes any and all items stored on computer memories, hard disks, floppy disks, CD-ROMs, removable media such as Zip disks, Jaz cartridges, Bernoulli Boxes and their equivalent, magnetic tapes of all types, microfiche, punched cards, punched tape, computer chips, including, but not limited to EPROM, PROM, RAM and ROM, on or in any other vehicle for digital data storage and/or transmittal. The term Electronic Data also includes the file, folder tabs and/or containers and labels appended to, or associated with, any physical storage device associated with each original and/or copy.

7. The acronym "**ESI**" means data including writings, drawings, emails, graphs, charts, photographs, sound recordings, images, and other data or data compilations — stored in any medium from which information can be obtained either directly or, if necessary, after translation into a reasonably usable form.

8. The term "**Person**" includes natural persons, proprietorships, partnerships, firms, corporations, institutions, bodies, joint ventures, estates, trusts, receivers, public corporations, other forms of legal entity, municipal corporations, federal, state and local governments, all departments and agencies thereof, and any other governmental agencies, political subdivisions, groups, associations or organizations, and any other group or combination acting as an entity.

9. The phrase "**Petition Date**" means May 1, 2020.

10. The phrase "**Procom Entities**" means (i) Procom America, LLC; (ii) Procom Investments KFT; (iii) Procom Consulting KFT; (iv) Procom Consulting Utazasi IRODA KFT; and (v) Procom Tours, LLC, as well as any of its/their predecessors, successors, parents, subsidiaries (direct or indirect), affiliates, divisions, groups and other operational or functional units thereof.

11. The phrase "**Procom Entity Representative(s)**" means:

- (i) Peter Gaal;
- (ii) Nikoletta "Nikki" Montgomery;
- (iii) Debra Watkins; and
- (iv) any of the Procom Entities' officer(s), director(s), manager(s), employee(s), agent(s), or other person(s) acting or authorized to act on its/their behalf (past or present).

12. The phrase "**Related to**" means directly or indirectly, concerning, referring to, reflecting, describing, evidencing, constituting, pertaining to, arising out of or in connection with, or in any way legally, logically or factually connected with the matter discussed.

13. Unless otherwise stated, the "**Relevant Period**" for each of the below topics and document requests is May 1, 2016, through and including May 1, 2020.

II. DEPOSITION TOPICS

IMPORTANT-(REFER TO ABOVE DEFINITIONS FOR MEANING OF TERMS).

Each of the Procom Entities shall designate and produce for deposition one or more of their officers, directors, managing agents, or other persons who are knowledgeable about and consent to testify on their behalf concerning the following subject matters:

1. The Debtor's acts, conduct, property, assets, liabilities, and financial condition.
2. The Debtor's payments to creditors in the ninety-day period preceding the Petition Date including, but not limited to, those identified on the attachment to the voluntary petition filed in the above-captioned bankruptcy case at Doc. 70, CM/ECF pp. 311-321.
3. The Debtor's payments or transfers to any of the Debtor Representative(s) in the four-year period preceding the Petition Date including, but not limited to, those identified on the attachment to the voluntary petition filed in the above-captioned bankruptcy case at Doc. 70, CM/ECF pp. 322-324.
4. The Debtor's payments or transfers to any of the Procom Entities in the four-year period preceding the Petition Date.
5. The Debtor's payments or transfers to any of the Procom Entity Representative(s) in the four-year period preceding the Petition Date.

6. The relationship, communications, and transactions between the Debtor or the Debtor Representative(s) and each of the Procom Entities or the Procom Entity Representative(s).

7. The relationship, communications, and transactions by and between the Debtor Entity Representative(s).

8. The relationship, communications, and transactions by and between the Procom Entity Representative(s).

9. The relationship, communications, and transactions between the Debtor or the Debtor Representative(s) and Dennis Ross, individually, and doing business as World War II Tours of Europe and Custom Euro Tours, and Cheryl Ross, individually and doing business as MRG Design.

10. The relationship, communications, and transactions between the Debtor or the Debtor Representative(s) and TravelX.

11. The relationship, communications, and transactions between the Debtor or the Debtor Representative(s) and Berkshire Hathaway Insurance Company.

12. The relationship, communications, and transactions between the Debtor or the Debtor Representative(s) and Viking Bond Service, Inc. (CA), Viking Bond Service, Inc. (FL), Viking Bond Service, Inc. (HI), Viking Bond Service, Inc. (IA), and Viking Bond Service, Inc. (WA).

13. The relationship, communications, and transactions between the Debtor or the Debtor Representative(s) and Forever Young, Inc.

III. DOCUMENTS REQUESTED

IMPORTANT-(REFER TO ABOVE DEFINITIONS FOR MEANING OF TERMS).

1. Any and all Communications, Documents, Electronic Data, and ESI concerning, referring to, relating to, and/or evidencing any assignment, transfer, or sale of any property (cash, real property, personal property, tangible property, intangible property, etc.) by the Debtor (directly or indirectly) to any of the Debtor Representative(s) in the Relevant Period.

2. Any and all Communications, Documents, Electronic Data, and ESI concerning, referring to, relating to, and/or evidencing any assignment, transfer, or sale of any property (cash, real property, personal property, tangible property, intangible property, etc.) by the Debtor (directly or indirectly) to any of the Procom Entities in the Relevant Period.

3. Any and all Communications, Documents, Electronic Data, and ESI concerning, referring to, relating to, and/or evidencing any assignment, transfer, or sale of any property (cash, real property, personal property, tangible property, intangible property, etc.) by the Debtor (directly or indirectly) to any of the Procom Entity Representative(s) in the Relevant Period.

4. Any and all Communications, Documents, Electronic Data, and/or ESI by and between any of the Debtor Representative(s) concerning, referring to, relating to, reflecting, and/or evidencing the Debtor during the Relevant Period.

5. Any and all Communications, Documents, Electronic Data, and/or ESI by and between any of the Debtor Representative(s) concerning, referring to, relating to, reflecting, and/or evidencing the Procom Entities during the Relevant Period.

6. Any and all Communications, Documents, Electronic Data, and/or ESI by and between any of the Procom Entity Representative(s) concerning, referring to, relating to, reflecting, and/or evidencing the Debtor during the Relevant Period.

7. Any and all Communications, Documents, Electronic Data, and/or ESI by and between any of the Procom Entity Representative(s) concerning, referring to, relating to, reflecting, and/or evidencing the Procom Entities during the Relevant Period.

8. Any and all Communications, Documents, Electronic Data, and/or ESI by and between the Debtor or any of the Debtor Representative(s) concerning, referring to, relating to, reflecting, and/or evidencing Peter Gaal during the Relevant Period.

9. Any and all Communications, Documents, Electronic Data, and/or ESI by and between the Debtor or any of the Debtor Representative(s) concerning, referring to, relating to, reflecting, and/or evidencing Nikoletta "Nikki" Montgomery during the Relevant Period.

10. Any and all Communications, Documents, Electronic Data, and/or ESI by and between the Debtor or any of the Debtor Representative(s) concerning, referring to, relating to, reflecting, and/or evidencing Debra Watkins during the Relevant Period.

11. Any and all Communications, Documents, Electronic Data, and/or ESI by and between the Procom Entities or any of the Procom Entity Representative(s) concerning, referring to, relating to, reflecting, and/or evidencing Peter Gaal during the Relevant Period.

12. Any and all Communications, Documents, Electronic Data, and/or ESI by and between the Procom Entities or any of the Procom Entity Representative(s) concerning, referring to, relating to, reflecting, and/or evidencing Nikoletta "Nikki" Montgomery during the Relevant Period.

13. Any and all Communications, Documents, Electronic Data, and/or ESI by and between the Procom Entities or any of the Procom Entity Representative(s) concerning, referring to, relating to, reflecting, and/or evidencing Debra Watkins during the Relevant Period.

14. Any and all Communications, Documents, Electronic Data, and/or ESI by and between the Debtor or any of the Debtor Representative(s) and Renaissance Consulting & Development LLC or Kevin Riggs concerning, referring to, relating to, reflecting, and/or evidencing the Debtor in the Relevant Period.

15. Any and all Communications, Documents, Electronic Data, and/or ESI by and between the Debtor or any of the Debtor Representative(s) and Renaissance Consulting &

Development LLC or Kevin Riggs concerning, referring to, relating to, reflecting, and/or evidencing the Procom Entities in the Relevant Period.

16. Any and all Communications, Documents, Electronic Data, and/or ESI by and between the Procom Entities or any of the Procom Entity Representative(s) and Renaissance Consulting & Development LLC or Kevin Riggs concerning, referring to, relating to, reflecting, and/or evidencing the Debtor in the Relevant Period.

17. Any and all Communications, Documents, Electronic Data, and/or ESI by and between the Procom Entities or any of the Procom Entity Representative(s) and Renaissance Consulting & Development LLC or Kevin Riggs concerning, referring to, relating to, reflecting, and/or evidencing the Procom Entities in the Relevant Period.

18. Any and all Communications, Documents, Electronic Data, and/or ESI by and between the Debtor or any of the Debtor Representative(s) and Forever Young, Inc. (or any of its owners, officers, directors, managers, employees, independent contractors, agents, or other individual(s) acting or purporting to act on its behalf) concerning, referring to, relating to, reflecting, and/or evidencing the Debtor in the Relevant Period.

19. Any and all Communications, Documents, Electronic Data, and/or ESI by and between the Procom Entities or any of the Procom Entity Representative(s) and Forever Young, Inc. (or any of its owners, officers, directors, managers, employees, independent contractors, agents, or other individual(s) acting or purporting to act on its behalf) concerning, referring to, relating to, reflecting, and/or evidencing the Debtor in the Relevant Period.

20. Any and all Communications, Documents, Electronic Data, and/or ESI by and between the Debtor or any of the Debtor Representative(s) and Forever Young, Inc. (or any of its owners, officers, directors, managers, employees, independent contractors, agents, or other individual(s) acting or purporting to act on its behalf) concerning, referring to, relating to, reflecting, and/or evidencing the Procom Entities in the Relevant Period.

21. Any and all Communications, Documents, Electronic Data, and/or ESI by and between the Procom Entities or any of the Procom Entity Representative(s) and Forever Young, Inc. (or any of its owners, officers, directors, managers, employees, independent contractors, agents, or other individual(s) acting or purporting to act on its behalf) concerning, referring to, relating to, reflecting, and/or evidencing the Procom Entities in the Relevant Period.

22. Any and all Communications, Documents, Electronic Data, and/or ESI by and between the Debtor or any of the Debtor Representative(s) and TravelX concerning, referring to, relating to, reflecting, and/or evidencing the Debtor in the Relevant Period.

23. Any and all Communications, Documents, Electronic Data, and/or ESI by and between the Procom Entities or any of the Procom Entity Representative(s) and TravelX concerning, referring to, relating to, reflecting, and/or evidencing the Debtor in the Relevant Period.

24. Any and all Communications, Documents, Electronic Data, and/or ESI by and between the Debtor or any of the Debtor Representative(s) and TravelX concerning, referring to, relating to, reflecting, and/or evidencing the Procom Entities in the Relevant Period.

25. Any and all Communications, Documents, Electronic Data, and/or ESI by and between the Procom Entities or any of the Procom Entity Representative(s) and TravelX concerning, referring to, relating to, reflecting, and/or evidencing the Procom Entities in the Relevant Period.

26. Any and all Communications, Documents, Electronic Data, and/or ESI by and between the Debtor or any of the Debtor Representative(s) and Berkshire Hathaway Insurance Company concerning, referring to, relating to, reflecting, and/or evidencing the Debtor in the Relevant Period.

27. Any and all Communications, Documents, Electronic Data, and/or ESI by and between the Procom Entities or any of the Procom Entity Representative(s) and Berkshire Hathaway Insurance Company concerning, referring to, relating to, reflecting, and/or evidencing the Debtor in the Relevant Period.

28. Any and all Communications, Documents, Electronic Data, and/or ESI by and between the Debtor or any of the Debtor Representative(s) and Berkshire Hathaway Insurance Company concerning, referring to, relating to, reflecting, and/or evidencing the Procom Entities in the Relevant Period.

29. Any and all Communications, Documents, Electronic Data, and/or ESI by and between the Procom Entities or any of the Procom Entity Representative(s) and Berkshire Hathaway Insurance Company concerning, referring to, relating to, reflecting, and/or evidencing the Procom Entities in the Relevant Period.

30. Any and all Communications, Documents, Electronic Data, and/or ESI by and between the Debtor or any of the Debtor Representative(s) and Viking Bond Service, Inc. (CA), Viking Bond Service, Inc. (FL), Viking Bond Service, Inc. (HI), Viking Bond Service, Inc. (IA), and Viking Bond Service, Inc. (WA) concerning, referring to, relating to, reflecting, and/or evidencing the Debtor in the Relevant Period.

31. Any and all Communications, Documents, Electronic Data, and/or ESI by and between the Procom Entities or any of the Procom Entity Representative(s) and Viking Bond Service, Inc. (CA), Viking Bond Service, Inc. (FL), Viking Bond Service, Inc. (HI), Viking Bond Service, Inc. (IA), and Viking Bond Service, Inc. (WA) concerning, referring to, relating to, reflecting, and/or evidencing the Debtor in the Relevant Period.

32. Any and all Communications, Documents, Electronic Data, and/or ESI by and between the Debtor or any of the Debtor Representative(s) and Viking Bond Service, Inc. (CA), Viking Bond Service, Inc. (FL), Viking Bond Service, Inc. (HI), Viking Bond Service, Inc. (IA), and Viking Bond Service, Inc. (WA) concerning, referring to, relating to, reflecting, and/or evidencing the Procom Entities in the Relevant Period.

33. Any and all Communications, Documents, Electronic Data, and/or ESI by and between the Procom Entities or any of the Procom Entity Representative(s) and Viking Bond Service, Inc. (CA), Viking Bond Service, Inc. (FL), Viking Bond Service, Inc. (HI), Viking Bond

Service, Inc. (IA), and Viking Bond Service, Inc. (WA) concerning, referring to, relating to, reflecting, and/or evidencing the Procom Entities in the Relevant Period.

34. Any and all Communications, Documents, Electronic Data, and/or ESI by and between the Debtor or any of the Debtor Representative(s) concerning, referring to, relating to, reflecting, and/or evidencing that certain Asset Purchase Agreement by and between the Debtor and Dennis Ross, individually, and doing business as World War II Tours of Europe and Custom Euro Tours and Cheryl Ross, individually and doing business as MRG Design.

35. Any and all Communications, Documents, Electronic Data, and/or ESI by and between the Procom Entities or any of the Procom Entity Representative(s) concerning, referring to, relating to, reflecting, and/or evidencing that certain Asset Purchase Agreement by and between the Debtor and Dennis Ross, individually, and doing business as World War II Tours of Europe and Custom Euro Tours and Cheryl Ross, individually and doing business as MRG Design.

36. Any and all Communications, Documents, Electronic Data, and/or ESI by and between the Debtor or any of the Debtor Representative(s) concerning, referring to, relating to, reflecting, and/or evidencing the Procom America 401(k) Plan.

37. Any and all Communications, Documents, Electronic Data, and/or ESI by and between the Procom Entities or any of the Procom Entity Representative(s) concerning, referring to, relating to, reflecting, and/or evidencing the Procom America 401(k) Plan.

38. All documents reviewed by the witness in preparation for the 2004 examination.

Label Matrix for local noticing
113A-8
Case 8:20-bk-03522-MGW
Middle District of Florida
Tampa
Tue Aug 23 16:12:28 EDT 2022

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Tallahassee, FL 32317-8461

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2125 22nd St
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Scott Mundy
2909 E Linton Rd
Benton, LA 71006-9666

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32768 N Weathervane
Lakemoor, IL 60051-3241

Scott Vigallon
3037 Badger Dr
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Duncan, AZ 85534-8078

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Fort Smith, AR 72908-9057

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Stevenson, WA 98648-6015

Stephan Granberry
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Stephanie Lyons
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Sue Meyer
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Lerna, IL 62440-2808

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Susan Mcnutt
2526 Hunt Heights Dr
Lakesite, TN 37379-3036

Susan Tempin
316 S Shannon Dr
Woodstock, IL 60098-9422

Susan Tully
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Reno, NV 89511-5357

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William Zadrozny
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Wrentham, MA 02093-1811

Winfreda Lutz
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Colorado Springs, CO 80921-2204

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Clifford Roehe
218 South 2nd Street
Beasley, TX 77417

GreatAmerica Financial Services Corp
ATTN: Peggy Upton
P.O. Box 609
Cedar Rapids, IA 52406

James La Velle
32833 540th St.
Gilmore City, IA 50541-8089

James Patrick Geary
10035 Willey Court
Granite Bay, CA 95746

Addresses marked (c) above for the following entity/entities were corrected as required by the USPS Locatable Address Conversion System (LACS).

Kathleen LaMura
135A Turtle Run Dr
Stratford, CT 06614

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) Diane Balsis
Removed from Case

(u) Jimmy Moore
Request to be Removed from Matrix Doc 39

(u) Kenneth Cramer
Address removed per request at Doc 419

End of Label Matrix
Mailable recipients 545
Bypassed recipients 3
Total 548

From: [Kathleen L. DiSanto](#)
To: [Lynn W. Sherman](#); [Berman, Steven M.](#); [Ballentine, Andrew S.](#)
Cc: [Tanya A. Yatsco](#); [Robert Elgidely \(relgidely@foxrothschild.com\)](mailto:relgidely@foxrothschild.com); [David C. Cimo - Cimo Mazer Mark, PLLC \(dcimo@cmmlawgroup.com\)](#)
Subject: RE: Rule 2004 examinations
Date: Friday, September 2, 2022 4:33:45 PM

CAUTION: External Email

Steve,

As you know, I represent Procom Consulting KFT and Procom Investments, KFT. While you may have assumed as much from Lynn's email, to close the loop, a representative of my clients will not appear for the scheduled Rule 2004 examinations either.

Thank you,
Kathleen

Kathleen L. DiSanto, Esq.
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1801 North Highland Avenue
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(813) 224-9255 [Phone]
(813) 223-9620 [Fax]
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From: Lynn W. Sherman <LSherman@trenam.com>
Sent: Friday, September 2, 2022 3:26 PM
To: Steven Berman (sberman@shumaker.com) <sberman@shumaker.com>; Andrew Ballentine - Shumaker, Loop & Kendrick, LLP (asballentine@shumaker.com) <asballentine@shumaker.com>
Cc: Tanya A. Yatsco <TYatsco@trenam.com>; Kathleen L. DiSanto <kdisanto@bushross.com>; Robert Elgidely (relgidely@foxrothschild.com) <relgidely@foxrothschild.com>; David C. Cimo - Cimo Mazer Mark, PLLC (dcimo@cmmlawgroup.com) <dcimo@cmmlawgroup.com>
Subject: [EXTERNAL] Rule 2004 examinations

"External Email"

Steve,

Pursuant to the submitted (but not yet entered) orders on the Trustee's motion to compel, I am writing to advise you that Mr. Gaal will not be appearing for his scheduled Rule 2004 examination. To avoid any confusion, Mr. Gaal also has not been designated and has not agreed to appear as the Rule 30(b)(6) representative of any of the entities scheduled for Rule 2004 examinations.

Lynn

LYNN W. SHERMAN | ATTORNEY

Dir: 727-820-3980 | Fax: 727-820-3974 | [email](#) | [vcard](#) | [bio](#)

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