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U.S. BANKRUPTCY COURT
FILED
NEWARK, NJ
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BY: 
CLERK

7 **UNITED STATES BANKRUPTCY COURT**
8 **DISTRICT OF NEW JERSEY (NEWARK VICINAGE)**

9 In re:

DIRECTBUY HOME
IMPROVEMENT, INC.,
d/b/a Z Gallerie,
Debtor.

Chapter 11
Case No. 23-19159 (SLM)
Hon. Stacey L. Meisel
U.S. Bankruptcy Judge

10 **NOTICE OF MOTION**

11 (Emergency Motion to Dismiss for Bad Faith/Fraud; Disqualify & Disgorge;
12 Correct Petition; § 3057 Referral)

13 TO: The Debtor; the Office of the United States Trustee; Debtor's counsel (Cole
14 Schotz P.C.); any Plan Administrator/Liquidation Trustee and counsel; any Official
15 Committee and counsel; any DIP lender/insider parties and their counsel of record;
16 and all parties that have filed a request for notice under Fed. R. Bankr. P. 2002.

17 PLEASE TAKE NOTICE that Thomas Pope and Elena (Elona) Pope (pro se) have
18 filed an Emergency Motion seeking: (i) dismissal for cause under 11 U.S.C.
19 § 1112(b) for bad faith and fraud on the Court; (ii) disqualification of Cole Schotz
20 P.C. and Michael D. Sirota with denial/disgorgement of compensation under 11

1 U.S.C. § 328(c) for Rule 2014/2016 disclosure failures and conflicts; (iii)
2 correction of the Debtor's false sworn Petition (Official Form 201, Question 9);
3 and (iv) referral under 18 U.S.C. § 3057(a) (Rule 9011 reserved).

4 HEARING DATE/TIME/PLACE: Movants have simultaneously submitted an
5 Application for Order Shortening Time under D.N.J. LBR 9013-2(c). Subject to
6 the Court's order, Movants propose the hearing be held on Tuesday, October 8,
7 2025 at 10:00 a.m. Eastern (virtual), United States Bankruptcy Court, Martin
8 Luther King, Jr. Federal Building, 50 Walnut Street, 3rd Floor, Newark, NJ 07102,
9 or by remote means if the Court so directs. If the Court enters an Order Shortening
10 Time, the date/time in that Order shall control and this Notice shall be deemed
11 conformed to the OST without further notice.

12 OBJECTIONS/RESPONSES: If you oppose the Motion, you must file a written
13 objection with the Clerk of the United States Bankruptcy Court, 50 Walnut Street,
14 3rd Floor, Newark, NJ 07102, and serve it on the undersigned so as to be received
15 by the deadlines set in the Order Shortening Time (notwithstanding Fed. R. Bankr.
16 P. 9006(f)). If the Application to Shorten Time is not granted, objections must
17 comply with the standard timing in D.N.J. LBR 9013-2(b) and any posted
18 hearing-date requirements for Judge Meisel.

19 MOTION PAPERS: The Motion package includes: (1) this Notice of Motion; (2)
20 Certification(s) of Thomas and Elena (Elona) Pope under 28 U.S.C. § 1746

consistent with D.N.J. LBR 7007-1 (facts-only); (3) the Emergency Motion and supporting legal authorities; (4) a Proposed Order (merits); (5) an Application for Order Shortening Time with a Certification of Urgency; and (6) a Proposed Order Shortening Time.

NO ORAL ARGUMENT WILL BE HEARD unless the Court directs otherwise. Appearance instructions (remote) will be as stated in the Court's order or posted procedures.

Respectfully submitted this 2d Day of October, 2025


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**UNITED STATES BANKRUPTCY COURT
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In re:

DIRECTBUY HOME
IMPROVEMENT, INC.,
d/b/a Z Gallerie,
Debtor.

Chapter 11
Case No. 23-19159 (SLM)
Hon. Stacey L. Meisel
U.S. Bankruptcy Judge

**EMERGENCY MOTION TO DISMISS CHAPTER 11 CASE FOR BAD
FAITH AND FRAUD; TO DISQUALIFY DEBTOR'S COUNSEL (COLE
SCHOTZ P.C. AND MICHAEL D. SIROTA) AND DISGORGE
COMPENSATION; TO CORRECT FALSE SWORN PETITION; AND TO
REFER SUSPECTED BANKRUPTCY OFFENSES UNDER 18 U.S.C. § 3057**

Movants Thomas Pope and Elena (Elona) Pope (together, the "Popes"), appearing
pro se, respectfully move on an emergency basis for entry of an order:

1. dismissing this Chapter 11 case for cause under 11 U.S.C. § 1112(b) based
on bad faith and fraud on the Court;
2. disqualifying Cole Schotz P.C. and Michael D. Sirota as debtor's counsel
and denying/ordering disgorgement of fees under 11 U.S.C. §§ 327(a),
328(c) and Fed. R. Bankr. P. 2014/2016;

1 3. directing correction of the debtor's false sworn Petition (Official Form 201,
2 Q.9); and

3 4. referring suspected bankruptcy offenses to the United States Attorney under
4 18 U.S.C. § 3057(a) (with Rule 9011 sanctions expressly reserved).

5 **I. Introduction**

6 1. This case began with a false sworn Petition and has proceeded under a
7 repeat-player, serial-bankruptcy scheme that masks continuity of enterprise
8 while liabilities are shunted away. The debtor, DirectBuy Home
9 Improvement, Inc. ("DBHI") d/b/a Z Gallerie ("ZG"), is, in substance, the
10 post-2017 continuation of "DirectBuy" on the CSC Generation platform,
11 now coupled with the ZGallerie brand purchased in 2019. The same law firm
12 and the same attorney (Cole Schotz/ Michael Sirota) that appeared in the
13 2016 DirectBuy sale process in Delaware is debtor's counsel here, yet its
14 prior connections were not candidly disclosed. The Petition answered "No"
15 to Official Form 201, Q.9 (prior bankruptcy cases within 8 years), despite
16 the ZGallerie 2019 Chapter 11 and the 2016 DirectBuy cases central to this
17 debtor's identity, a material false oath signed under penalty of perjury.

18 2. A recent Karat Home e-commerce transaction cements the pattern: Karat's
19 own legal pages admit it is "Karat Home Improvement, Inc. d/b/a ZGallerie"
20 and direct copyright notices to 8450 Broadway, Merrillville, Indiana,
21 DirectBuy's historic headquarters, while its privacy policy says customer

1 data “may be shared with CSCGH and its family of brands.” These are plain
2 admissions of headquarters and data/platform **continuity** across entities used
3 to fragment liabilities while preserving a single enterprise’s value.

4 [https://www.stumpandcompany.com/news/articles-publications/acquisition-](https://www.stumpandcompany.com/news/articles-publications/acquisition-complete-what-are-karat-homes-plans-for-z-gallerie/)
5 [complete-what-are-karat-homes-plans-for-z-gallerie/](https://www.stumpandcompany.com/news/articles-publications/acquisition-complete-what-are-karat-homes-plans-for-z-gallerie/)

6 Under § 1112(b) and Third Circuit good-faith jurisprudence (SGL Carbon; LTL),
7 this serial-abuse filing, compounded by a false oath and counsel conflicts, must be
8 dismissed. The Court should also disqualify Cole Schotz, order § 328(c)
9 disgorgement, correct the petition on the docket, and make a § 3057 referral.

10 **II. Statement of Facts**

11 **A. Background: Trivest’s 2007 take-private; financial arc**

12
13 3. **2007 take-private.** DirectBuy was taken private by Trivest Partners in late
14 2007. The transaction value was widely reported as approximately \$550+
15 million (contemporaneous accounts and references report the acquisition by
16 Trivest in November 2007; we cite for context only).

17 4. **Pattern of Concealment:** Trivest Partners’ “hidden reentry” into the
18 DirectBuy enterprise during this case was never disclosed to creditors or the
19 Court. Trivest, which had ostensibly exited DirectBuy upon the CSC
20 acquisition, quietly made a “strategic investment” in Province LLC in mid-
21 2024. Province LLC happens to be the financial advisory firm that the

1 Official Committee of Unsecured Creditors hired in August 2024 to advise
2 on this very case. In other words, Trivest acquired a direct or indirect interest
3 in the Committee's chief advisor during the pendency of this Chapter 11,
4 meaning a former owner of DirectBuy (and potential target of estate claims)
5 was inserted into the heart of the creditors' camp. Yet no disclosure of this
6 conflict was made in the Committee's Rule 2014 retention papers,
7 Province's affidavit did not mention that its new private equity backer was
8 Trivest (which was a material connection given Trivest's history with the
9 Debtor). In short, the Debtor's principals have repeatedly treated disclosure
10 obligations as optional, to creditors' detriment. Province/Trivest link,
11 arising mid-stream of this case's wind-down, squarely raises independence
12 and disclosure concerns when Province is, in fact or in appearance,
13 connected to the DirectBuy ecosystem. Trivest has faced RICO allegations
14 in unrelated litigation (Pink Energy), which makes full transparency here
15 even more important, especially where Movants allege the same cast
16 (including Jamie Elias of Trivest) has reappeared around DirectBuy
17 enterprise.

18 **B. 2016 Delaware bankruptcy of "Old DirectBuy" and 2017 CSC takeover**

19 **5. Case and bid procedures.** On November 1, 2016, DirectBuy Holdings, Inc.
20 and affiliates filed in D. Del. The court approved bid procedures on

December 1, 2016 (B.D.I. 126) and approved Derby SPV, Inc. as stalking horse.

6. **Late switch to CSC.** On February 10, 2017, the debtors executed an APA with CSC Generation and filed a Notice of Successful Bidder (B.D.I. 364) naming CSC as winner; the court entered the Sale Order on February 14, 2017 (B.D.I. 377). The case was later dismissed by Order (B.D.I. 715) after admin. fees/UST fees were satisfied, no plan or discharge.

7. **Consideration context.** Contemporaneous reporting reflects the stalking horse Derby SPV at \$10 million plus assumes; later coverage described the CSC cash component as “up to \$950,000” plus assumed liabilities—orders-of-magnitude below the 2007 valuation, underscoring possible under-valuation / continuity concerns.

C. Continuity: people, platform, vendors, and location

8. **Headquarters continuity.** The 8450 Broadway, Merrillville, IN 46410 address is DirectBuy’s historic HQ and appears as the DMCA/copyright agent address in ZG’s current Terms & Conditions (now under Karat Home). This is a direct admission that ZG/Karat routes legal notices through DirectBuy’s HQ.

9. **Data/platform continuity.** ZG’s Privacy Policy states customer data may be shared with “CSCGH and its family of brands”, confirming ongoing CSC platform data integration.

10. DirectBuy Travel vendor continuity (Arrivia/ICE). Public records show

“DirectBuy Travel” is a tradename used by International Cruise & Excursions, Inc. (ICE) (now Arrivia), demonstrating continuity of member-travel servicing before and after 2016; Arriva's ownership transitioned in Jan. 2025 to a consortium led by Oaktree (context only; no overclaim).

D. This case (DBHI d/b/a ZGallerie, 2023–2025)

11. Filing and confirmation. The debtor filed Oct. 16, 2023; plan confirmed

Apr. 19, 2024. The docket reflects Cole Schotz P.C. (including Michael D. Sirota) as debtor’s counsel—repeat-player posture relative to 2016.

“Third bankruptcy” for ZG; liquidating posture. Contemporary reporting described ZGallerie’s third bankruptcy (2009, 2019, 2023). The 2023 case involved broad store closings/liquidations (context).

<https://www.latimes.com/socal/daily-pilot/news/story/2023-10-27/its-curtains-for-z-gallerie-at-south-coast-plaza-as-owners-hold-fire-sale-amid-bankruptcy>

12. Karat Home overlay (post-confirmation transition). Industry coverage in

August 2024 reported Karat Home Improvement, Inc. d/b/a ZGallerie acquired ZG’s e-commerce assets and was relaunching the online business, consistent with transition services/public statements. Karat’s Terms expressly identify “Karat Home Improvement, Inc. d/b/a Z Gallerie” and list

1 the 8450 Broadway address for the copyright agent; its Privacy Policy
2 acknowledges data sharing with CSCGH, plain badges of
3 alter-ego/continuation (HQ, platform, brand continuity).

4 **13. Popes' claims and motive.** Movants (Thomas and Elena Pope / Buy Direct

5 LLC) are long-time **DirectBuy franchisees** with substantial claims. In **ND**
6 **Ind. No. 2:15-cv-00344**, the district court dismissed certain counterclaims
7 on **Sept. 6, 2024**; Movants appealed (**7th Cir. No. 24-2772**). On **Oct. 17,**
8 **2024**, the **Seventh Circuit** stayed the appeal based on this **DBHI** bankruptcy
9 filing. The Popes (and BuyDirect LLC) filed substantial proofs of claim (the
10 Popes' asserted damages approximate \$47.4 million each, with BuyDirect
11 LLC asserting a similar amount; aggregate $\approx$ \$142.2 million), tied to the
12 Houston DirectBuy franchise, which historically had ~20,000 members
13 (over 10% of the base). The scale of franchise claims furnishes motive for
14 enterprise-liability evasion via serial restructurings.

15 **E. False sworn Petition (Official Form 201, Question 9)**

16 **14. Material misstatement.** The debtor's Official Form 201 answered "No" to
17 Q.9 (any prior bankruptcy cases filed by or against the debtor within 8
18 years). That is false. Within 8 years: (i) ZGallerie's 2019 Chapter 11 (whose
19 business this debtor owns/operates); and (ii) the DirectBuy 2016 proceedings
20 underpinning this debtor's identity and continuity. The plan-confirmed ZG

2019 docket and the 2016 DirectBuy dockets are matters of public record.

The Court can take judicial notice.

<https://upshotservices.s3.amazonaws.com/files/577613f6-12e9-4c3d-87e0-b6bbbd3f1cb7/cf166baf-1219-478d-8af6-ec55815e4d98.pdf>

15. Note on CSC corporate-site transparency. On information and belief, the **cscgeneration.com** landing page does not conspicuously post Terms/Privacy/DMCA disclosures; if any data collection reaches Californians, CalOPPA/CPRA would require disclosures. Movants flag this as a compliance red flag; we do not over-claim at this time.

cscgeneration.com

IV. Legal Standards

Dismissal for bad faith: 11 U.S.C. § 1112(b); *In re SGL Carbon Corp.*, 200 F.3d 154 (3d Cir. 1999); *In re LTL Mgmt., LLC*, 99 F.4th 490 (3d Cir. 2024).

Fraud on the court: Fed. R. Civ. P. 60(d)(3) (via Bankr. R. 9024); *Hazel-Atlas Glass Co. v. Hartford-Empire Co.*, 322 U.S. 238 (1944).

Professional conflicts/disclosure: 11 U.S.C. §§ 327(a), 328(c); Fed. R. Bankr. P. 2014/2016; *In re BH&P, Inc.*, 949 F.2d 1300 (3d Cir. 1991); *In re Congoleum Corp.*, 426 F.3d 675 (3d Cir. 2005); *In re Park-Helena Corp.*, 63 F.3d 877 (9th Cir. 1995); *Rome v. Braunstein*, 19 F.3d 54 (1st Cir. 1994).

§ 363 good-faith purchaser & collusion: *In re Abbotts Dairies*, 788 F.2d 143 (3d Cir. 1986); 11 U.S.C. § 363(n).

1 Effect of dismissal: 11 U.S.C. § 349.

2 Alter-ego/substantive consolidation guideposts: In re Owens Corning,

3 419 F.3d 195 (3d Cir. 2005); In re Mobile Steel Co., 563 F.2d 692 (5th Cir. 1977).

4 Criminal referral: 18 U.S.C. § 3057(a); potential offenses 18 U.S.C. §§ 152(1),

5 152(3), 157, 1519.

6 Advocate-witness: N.J. RPC 3.7 (via L. Civ. R. 103.1; D.N.J. LBR 9010-1).

7 **V. Argument**

8 **A. Cause exists to dismiss under § 1112(b): bad faith and fraud on the Court**

9 **16. Third Circuit good-faith requirement.** A Chapter 11 petition must serve a

10 valid bankruptcy purpose and be filed in good faith; otherwise, dismissal is

11 mandatory under § 1112(b). SGL Carbon and LTL make clear that tactical

12 filings to gain litigation advantage or to warehouse liabilities without a

13 credible reorganization violate the good-faith requirement.

14 Serial-abuse pattern and no reorganizational purpose. This is effectively

15 DirectBuy's second and ZGallerie's third bankruptcy in a short span. The

16 2016 DirectBuy case ended in a quick § 363 sale to CSC and dismissal (no

17 plan), and the 2019 ZG case transferred that brand to the same platform.

18 Now, in 2023, DBHI returns to Chapter 11 primarily to liquidate ZG stores

19 and re-platform e-commerce, while preserving continuity of data, customers,

20 and know-how for insiders/affiliates (including Karat), not to reorganize for

creditors' benefit. The LA Times contemporaneously labeled the 2023 ZG filing a "third bankruptcy," underscoring serial use.

17.False oath on Day 1. The Petition's "No" to Q.9 (prior cases) is a material false statement. At minimum, the debtor had to disclose ZG 2019; the enterprise's 2016 history is central to identity and continuity. A debtor that commences a case with a false oath has not approached the Court in good faith. 18 U.S.C. § 152(3) criminalizes a false declaration under penalty of perjury "in relation to" a Title 11 case. The omission here is neither technical nor harmless, it directly impeded appropriate early-case oversight.

18.Fraud on the Court. Fed. R. Civ. P. 60(d)(3) (via Bankr. R. 9024) preserves the Court's inherent power to address fraud on the court—conduct that "defiles the court itself." Hazel-Atlas, 322 U.S. at 245–46. The coordinated effect of (i) a false petition, (ii) non-transparent professional disclosures, and (iii) enterprise-continuity steps (infra § V.B) satisfies this standard.

Best interests favor dismissal (not conversion). The posture is liquidating, administrative costs continue to accrue, and any Chapter 7 trustee would inherit a depleted estate amid complex insider issues. Dismissal permits creditors to pursue non-bankruptcy remedies promptly and prevents further misuse of the stay. See § 349.

B. Karat Home: badges of continuity, alter-ego indicators, and the “fraud of separation”

19. Admissions on Karat’s own legal pages. “Karat Home Improvement, Inc.

d/b/a ZGallerie” and designate the copyright agent at “8450 Broadway, Merrillville, IN 46410.” Its Privacy Policy states customer data “may be shared with CSCGH and its family of brands.” These are plain, current admissions that the post-confirmation e-commerce operator (Karat) continues to route IP/legal notices through DirectBuy’s historical HQ and shares data within the CSC platform. They are strong alter-ego/substantive-consolidation badges (common office, integrated IT/data, shared brand operations).

Transactional context. Coverage in August 2024 reported Karat’s acquisition of ZG e-commerce assets and relaunch plans (with transition services), consistent with continuity of systems and customers from DBHI/CSC to Karat. The HQ address and CSCGH data-sharing admissions tie that public narrative back to DirectBuy’s physical and digital infrastructure.

Why it matters to § 1112(b). When a debtor uses Chapter 11 to transfer operating assets to an affiliate/alter-ego (retaining data, brand goodwill, and HQ nexus) while jettisoning liabilities (including franchise claims like the Popes’), the filing is not to reorganize an enterprise for creditors, but to

1 launder liabilities. That is bad faith. See SGL Carbon; LTL. The
2 Owens Corning/ “substantive consolidation” factors (entanglement, single
3 economic unit) support the Court’s view that dismissal, and, if the case were
4 to continue in any form, careful remedial orders, is appropriate. (Movants
5 are not seeking consolidation here; we underscore continuity to establish bad
6 faith.)

7 **20. Additional opacity.** On information and belief, cscgeneration.com lacks
8 conspicuous Terms/Privacy/DMCA at present; if so, and if Californians’
9 data are collected, CalOPPA/CPRA require disclosures. We flag this for the
10 UST/court as a compliance red flag supporting the opacity narrative; we do
11 not ask the Court to adjudicate state-law privacy claims here.
12 cscgeneration.com

13 **C. Disqualification of Cole Schotz and § 328(c) disgorgement**

14 **21. Prior involvement in the 2016 DirectBuy case—undisclosed connections.**

15 The D. Del. record reflects Cole Schotz P.C. And Michael Sirota’s
16 involvement in the 2016 cases, demonstrating a direct connection to the
17 same enterprise lineage now before this Court. That prior connection,
18 together with knowledge of the sale and dismissal, should have been
19 forthrightly disclosed under Rule 2014 when Cole Schotz / Michael Sirota
20 sought employment here; failure to disclose itself warrants disqualification
21 and denial/disgorgement of compensation.

1 Non-disinterested/adverse interest; advocate-witness. Given the false
2 Petition, counsel Michael Sirota is a likely witness on material issues (who
3 knew what and when regarding Q.9; what conflicts review revealed; what
4 the enterprise history is). The advocate-witness rule (RPC 3.7) and
5 § 327(a)'s disinterestedness/no-adverse-interest requirements are implicated.
6 Courts enforce strict disclosure and strict remedies for violations. See
7 BH&P; Congoleum; Park-Helena; Rome. The appropriate remedy is
8 disqualification and § 328(c) denial/disgorgement of all fees (including
9 pre-petition retainers applied post-petition).

10 **D. Petition correction and § 3057 referral; Rule 9011 reserved**

11 **22. Correct the record.** The Court should direct the debtor to amend/correct
12 Official Form 201 within 7 days to list the 2019 ZGallerie and 2016
13 DirectBuy cases (jurisdiction, dates, core orders).

14 **23. Criminal referral under § 3057(a).** The Petition's false answer is
15 "reasonable grounds" to believe a violation of 18 U.S.C. § 152(3) (false
16 declaration under penalty of perjury "in relation to" a Title 11 case) may
17 have occurred. Section 3057(a) states it is the duty of the judge to report
18 such facts to the U.S. Attorney. Referral should issue. (Movants reserve
19 Rule 9011; safe-harbor steps can proceed, if needed, after emergency relief.)

20 **VI. Requested Relief**

21 **Order, on an emergency basis, that:**

1 **A. Dismissal for cause (§ 1112(b)).** Dismiss this Chapter 11 for bad faith and
2 fraud on the Court, with prejudice to refiling for one year by the debtor or any
3 successor/alter-ego under common control.

4 **B. Disqualification/disgorgement.** Disqualify Cole Schotz P.C./ Michael D.
5 Sirota as debtor's counsel; deny all compensation and order disgorgement under
6 § 328(c) of all retainers/fees within 14 days; require a Rule 2016 certification of
7 compliance within 21 days.

8 **C. Petition correction.** Direct the debtor to correct Official Form 201, Q.9 within
9 7 days (or deem amended in the order), serving the UST and parties in interest.

10 **D. § 3057 referral.** Refer suspected offenses under 18 U.S.C. §§ 152, 157 to the
11 U.S. Attorney; direct transmittal of this Motion, the hearing transcript, the Petition,
12 and relevant docket materials.

13 **E. Reservation/retained jurisdiction.** Reserve all Rule 9011 and inherent-power
14 sanctions issues; retain jurisdiction to enforce disqualification/disgorgement and to
15 consider sanctions notwithstanding dismissal.

16 **VII. Proposed Order**

17 (Attached in full)

18 **VIII. Verification (28 U.S.C. § 1746)**

19 We, Thomas Pope and Elena (Elona) Pope, declare under penalty of perjury that
20 the factual statements attributed to us herein are true and correct to the best of our
21 knowledge, information, and belief, formed after reasonable inquiry; and that

matters stated on information and belief are so stated and believed to be true.

Respectfully submitted this 2d Day of October, 2025

/s/ Thomas Pope

Thomas Pope (Pro Se Creditor/Movant)

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/s/ Elena Pope

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**CERTIFICATION OF THOMAS POPE IN SUPPORT OF EMERGENCY
MOTION**

(28 U.S.C. § 1746)

I, Thomas Pope, declare under penalty of perjury:

1. I am a creditor and a pro se movant in In re DirectBuy Home Improvement, Inc., d/b/a Z Gallerie, Case No. 23-19159 (SLM) pending in the United States Bankruptcy Court for the District of New Jersey.

2. The Debtor filed this Chapter 11 case on October 16, 2023.

3. On April 19, 2024, the Court entered an order confirming the Debtor's Chapter 11 plan. Post-confirmation administration of the case has continued since confirmation.

4. In 2016, DirectBuy entities filed Chapter 11 cases in the United States Bankruptcy Court for the District of Delaware. The Court approved bid

1 procedures naming Derby SPV as stalking horse and, shortly before the sale
2 hearing, CSC Generation was designated the successful bidder.

3 5. The Delaware Bankruptcy Court entered a sale order in those cases on
4 February 14, 2017, approving the sale to CSC Generation.

5 6. The Delaware cases were later dismissed in July 2017. No plan was
6 confirmed in those cases.

7 7. Cole Schotz P.C. appeared as counsel for DirectBuy debtors in the 2016
8 Delaware bankruptcy proceedings.

9 8. In 2019, Z Gallerie, LLC filed Chapter 11 in the United States Bankruptcy
10 Court for the District of Delaware, and CSC-affiliated entities acquired Z
11 Gallerie's business during that proceeding.

12 9. In this New Jersey case, the Debtor has been represented by Cole Schotz
13 P.C.; Michael D. Sirota, Esq. signed filings as Debtor's counsel.

14 10. The Debtor's online legal pages for Z Gallerie currently identify "Karat
15 Home Improvement, Inc. d/b/a Z Gallerie."

16 11. Those pages list 8450 Broadway, Merrillville, Indiana 46410 as the address
17 for legal and/or DMCA notices associated with Z Gallerie.

18 12. The current Z Gallerie privacy disclosures state that customer data may be
19 shared with CSC Generation Holdings and its affiliated brands.

20 13. In early 2024, Z Gallerie's e-commerce assets were sold to an entity
21 affiliated with Karat Home.

1 14.DirectBuy Travel is operated by Arrivia (formerly International Cruise &
2 Excursions/ICE) and is described as a registered seller of travel.

3 15.My wife, Elena (Elona) Pope, and I have filed proofs of claim in this
4 bankruptcy case, and our company Buy Direct LLC has also filed a proof of
5 claim.

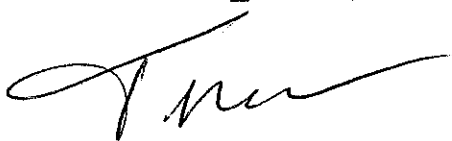
6 16.Before this bankruptcy, we litigated franchise-related claims in the United
7 States District Court for the Northern District of Indiana, Case No.
8 2:15-cv-00344. On September 6, 2024, that court entered an order
9 dismissing certain counterclaims we asserted.

10 17.We timely appealed that ruling to the United States Court of Appeals for the
11 Seventh Circuit, No. 24-2772. On October 17, 2024, the Seventh Circuit
12 entered an order staying the appeal in light of this bankruptcy.

13 18.The Debtor's Voluntary Petition (Official Form 201) filed on October 16,
14 2023 answered "No" to Question 9("Were prior bankruptcy cases filed by or
15 against the debtor within the last 8 years?").

16 I declare under penalty of perjury that the foregoing is true and correct.

17 Executed on the 2nd Day of October _____, 2025, at West Linn, Oregon.

18 

19 /s/Thomas Pope, Pro Se Creditor/Movant

20 P.O. Box 195, West Linn, OR 97068

21 Tel: (503) 575-5061 | Email: tompope.dallas@gmail.com

**CERTIFICATION OF ELENA (ELONA) POPE IN SUPPORT OF
EMERGENCY MOTION**

(28 U.S.C. § 1746)

I, Elena (Elona) Pope, declare under penalty of perjury:

1. I am a creditor and a pro se movant in In re DirectBuy Home Improvement, Inc., d/b/a Z Gallerie, Case No. 23-19159 (SLM) in the United States Bankruptcy Court for the District of New Jersey.

2. I have personal knowledge of our franchise dealings with DirectBuy and the matters described below, and I have reviewed the public court records and the Debtor's publicly available website information referenced here.

3. The Debtor filed this Chapter 11 case on October 16, 2023. The Court confirmed the Debtor's plan on April 19, 2024, and post-confirmation administration has continued.

4. In 2016, DirectBuy debtors filed Chapter 11 cases in Delaware; Derby SPV was initially approved as stalking horse; CSC Generation was later designated the successful bidder; a sale order entered on February 14, 2017; and the cases were dismissed in July 2017.

1 5. Cole Schotz P.C. appeared as counsel for DirectBuy debtors in the 2016
2 Delaware proceedings and represents the Debtor in this New Jersey case.

3 Michael D. Sirota, Esq. is the lead attorney who signed filings here.

4 6. In 2019, Z Gallerie, LLC filed Chapter 11 in Delaware; CSC-affiliated
5 entities acquired Z Gallerie's business.

6 7. The current Z Gallerie online legal pages identify "Karat Home
7 Improvement, Inc. d/b/a Z Gallerie," list 8450 Broadway, Merrillville,
8 Indiana 46410 for legal/DMCA notices, and state that data may be shared
9 with CSC Generation Holdings and affiliated brands.

10 8. In early 2024, the Z Gallerie e-commerce business was sold to an entity
11 affiliated with Karat Home.

12 9. DirectBuy Travel is operated by arrivia (formerly ICE) and is described as a
13 registered seller of travel.

14 10. I have filed a proof of claim in this bankruptcy case, and Buy Direct LLC
15 and Thomas Pope have filed proofs of claim as well.

16 11. In our Indiana litigation (N.D. Ind. No. 2:15-cv-00344), the district court
17 entered an order on September 6, 2024 dismissing certain counterclaims we
18 asserted. We appealed to the Seventh Circuit (No. 24-2772), which on
19 October 17, 2024 stayed the appeal because of this bankruptcy case.

1 12.The Debtor's Voluntary Petition (Official Form 201) filed on October 16,
2 2023 answered "No" to Question 9 regarding prior bankruptcy cases within
3 eight years.

4 I declare under penalty of perjury that the foregoing is true and correct.

5 Executed on the _2nd Day of October _____, 2025, at West Linn, Oregon.

6 
7 /s/ Elena Pope, Pro Se Creditor/Movant
8 P.O. Box 195, West Linn, OR 97068
9 Tel: (503) 995-0203 | Email: epope.houston@gmail.com

1 THOMAS POPE
2 P.O. Box 195
3 West Linn, Oregon 97068
4 Voice: (503) 575-5061
5 Email: tompope.dallas@gmail.com
6 Pro Se Creditor

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Voice: (503) 995-0203
Email: epope.houston@gmail.com
Pro Se Creditor

7 UNITED STATES BANKRUPTCY COURT
8 DISTRICT OF NEW JERSEY (NEWARK VICINAGE)

9 In re:

DIRECTBUY HOME
IMPROVEMENT, INC.,
d/b/a Z Gallerie,
Debtor.

Chapter 11
Case No. 23-19159 (SLM)
Hon. Stacey L. Meisel
U.S. Bankruptcy Judge

10
11 **[PROPOSED] ORDER**

12 **ORDER DISMISSING CASE FOR BAD FAITH AND FRAUD ON THE**
13 **COURT; DISQUALIFYING DEBTOR'S COUNSEL AND DISGORGING**
14 **FEES; DIRECTING CORRECTION OF DEBTOR'S PETITION; AND**
15 **REFERRING MATTER UNDER 18 U.S.C. § 3057**

16 Upon the Emergency Motion of Thomas and Elena Pope (the "Motion"); the Court
17 having considered the Motion and the record; and for good cause shown, IT IS
18 ORDERED:

19 1. The Motion is GRANTED as set forth herein.

20 2. Pursuant to 11 U.S.C. § 1112(b), this Chapter 11 case is DISMISSED FOR
21 CAUSE based on lack of good faith and fraud on the Court.

- 1 3. Dismissal is with prejudice: the debtor and any successor/affiliated entity
2 under common control may not refile under any chapter for one (1) year
3 absent further order.
- 4 4. Cole Schotz P.C. and Michael D. Sirota are DISQUALIFIED as debtor's
5 counsel. Pursuant to §§ 327(a), 328(c) and Rule 2014, all
6 compensation/expenses are disallowed, and within 14 days Cole Schotz shall
7 disgorge to the Plan Administrator or, if unavailable, into the registry of the
8 Court as the U.S. Trustee directs any retainers and payments received; a
9 Rule 2016 certification of compliance shall be filed within 21 days.
- 10 5. The Court finds that the debtor's Official Form 201 filed on October 16,
11 2023 contained a materially false answer to Question 9. The Petition is
12 deemed amended to list: *In re DirectBuy Holdings, Inc.*, Case No. 16-12435
13 (Bankr. D. Del. 2016) (sale order entered Feb. 14, 2017; case dismissed
14 July 19, 2017) and *In re ZGallerie, LLC*, Case No. 19-10488 (Bankr. D. Del.
15 2019) (sale/plan). Within 7 days, the debtor shall file a corrected statement
16 under 28 U.S.C. § 1746 and serve same on the UST and all parties who have
17 appeared.
- 18 6. Pursuant to 18 U.S.C. § 3057(a), the Court REFERS this matter to the
19 United States Attorney for the District of New Jersey for investigation of
20 possible violations of 18 U.S.C. §§ 152, 157 and any other applicable
21 statutes. The Clerk shall transmit this Order, the Motion, the Petition, and

1 the hearing transcript to the U.S. Attorney and note the referral on the
2 docket.

3 7. The Court retains jurisdiction to enforce this Order, including
4 disqualification/disgorgement, and to consider sanctions under Fed. R.
5 Bankr. P. 9011 or the Court's inherent power, notwithstanding dismissal.

6
7 Dated: _____, 2025

8
9
10 Hon. Stacey L. Meisel, U.S.B.J.

1 THOMAS POPE
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3 West Linn, Oregon 97068
4 Voice: (503) 575-5061
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6 Pro Se Creditor

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Email: epope.houston@gmail.com
Pro Se Creditor

7 **UNITED STATES BANKRUPTCY COURT**
8 **DISTRICT OF NEW JERSEY (NEWARK VICINAGE)**

9 In re:

DIRECTBUY HOME
IMPROVEMENT, INC.,
d/b/a Z Gallerie,
Debtor.

Chapter 11
Case No. 23-19159 (SLM)
Hon. Stacey L. Meisel
U.S. Bankruptcy Judge

10
11 **CERTIFICATE OF SERVICE**

12 We, Thomas Pope and Elena Pope, certify under penalty of perjury pursuant to 28
13 U.S.C. § 1746 that on ____ October 3^d ^(P)_____, 2025, we caused true and
14 correct copies of the following documents:

15 • Emergency motion to dismiss CHAPTER 11 case for bad faith and fraud; to
16 disqualify debtor's counsel (Cole Schotz P.C. And Michael d. Sirota) and disgorge
17 compensation; to correct false sworn petition; and to refer suspected bankruptcy
18 offenses under 18 u.S.C. § 3057 • Proposed Order; and • Notice of Motion, •
19 Application For Order Shortening Time, • Certification Of Urgency In Support Of
20 Order Shortening Time, • [Proposed] Order Shortening Time Period For Notice,
21 Setting Hearing, And Limiting Notice

1 to be served by depositing the same in the United States Mail, first-class postage
2 prepaid, addressed to the parties set forth below, in compliance with Fed. R. Bankr.
3 P. 7004 and 9014 and D.N.J. LBR 9013-1, and upon all parties on the Master
4 Service List/Rule 2002 List for this case as of the date of service (attached hereto
5 as Exhibit A).

6 SERVICE LIST (First-Class Mail)

7 Office of the United States Trustee (Region 3 – D.N.J.) Attn: Assistant U.S.
8 Trustee / Staff Attorneys Office of the United States Trustee One Newark Center,
9 1085 Raymond Blvd., Suite 2100 Newark, NJ 07102 (UST address confirmed by
10 USTP and the Court's Register of Governmental Units.)

11 Debtor – Corporate Service under Rule 7004(b)(3) DirectBuy Home Improvement,
12 Inc. (d/b/a Z Gallerie) Attention: Officer or Managing/General Agent 1855 W.
13 139th Street Gardena, CA 90249 (Debtor principal business address per DBHI
14 court filings.)

15 Debtor's Counsel Cole Schotz P.C. Court Plaza North 25 Main Street Hackensack,
16 NJ 07601 (Firm contact address per Cole Schotz website and case docket.)

17 Liquidation Trustee (post-confirmation) Alexandre Zyngier c/o Trif & Modugno,
18 LLC 89 Headquarters Plaza, North Tower, Suite 1201 Morristown, NJ 07960
19 (Trustee and counsel of record per docket/firm site.)

Counsel to the Liquidation Trustee Trif & Modugno, LLC 89 Headquarters Plaza,
North Tower, Suite 1201 Morristown, NJ 07960

Official Committee of Unsecured Creditors – Counsel Frost Brown Todd LLP
(Cincinnati) Attn: Ronald E. Gold, Esq.; Erin P. Severini, Esq. Great American
Tower 301 East Fourth Street, Suite 3300 Cincinnati, OH 45202

Frost Brown Todd LLP (Pittsburgh) Attn: Jordan S. Blask, Esq. 501 Grant Street,
Suite 800 Pittsburgh, PA 15219

Committee Financial Advisor (party directly affected by relief) Province, LLC
2360 Corporate Circle, Suite 340 Henderson, NV 89074

Debtor's Financial Advisor Sherwood Partners, Inc. 3945 Freedom Circle, Suite
560 Santa Clara, CA 95054

Interested Parties Referenced in the Motion (courtesy copies) CSC Generation
Holdings, Inc. 8450 Broadway Merrillville, IN 46410

CSCGH Shared Services, LLC 9111 Broadway, Suite EE Merrillville, IN 46410

Additionally, on the same date, we served all parties on the DBHI Master Service
List/Rule 2002 List maintained by Stretto for Case No. 23-19159 (SLM), as of the
date of service, by first-class mail at the addresses shown on that list. A copy of
that Master Service List is attached as Exhibit A to this Certificate.

1 We declare under penalty of perjury that the foregoing is true and correct.

2 Executed on __the_3rd^{EP} Day of October____, 2025, at West Linn, Oregon.

3

4



5 /s/Thomas Pope, Pro Se Creditor/Movant

6 P.O. Box 195, West Linn, OR 97068

7 Tel: (503) 575-5061 | Email: tompope.dallas@gmail.com

8



9 /s/Elena Pope, Pro Se Creditor/Movant

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Pro Se Creditor

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY (NEWARK VICINAGE)**

In re:

Chapter 11
Case No. 23-19159 (SLM)

DIRECTBUY HOME
IMPROVEMENT, INC.,
d/b/a Z Gallerie,
Debtor.

Hon. Stacey L. Meisel
U.S. Bankruptcy Judge

EXHIBIT A

MASTER SERVICE LIST / RULE 2002 LIST September 15, 2025

This Exhibit A consists of the current Master Service List/Rule 2002 List for the above-captioned Chapter 11 case, as maintained by the Court-appointed claims and noticing agent, Stretto, and retrieved from the case website on September 15, 2025 . The following pages are a true and correct copy of that list as it appeared on that date.

Pursuant to Fed. R. Bankr. P. 7004 and 9014, D.N.J. LBR 9013-1, and the Case Management Procedures in this case, Movants served their Motion papers on all parties listed on the Master Service List as of the date of service.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK. THE MASTER
SERVICE LIST FOLLOWS ON THE NEXT PAGES.]

Master Service List — Exhibit A

As of September 15, 2025

4th Street Holdings LLC
Attn: Eric Muhlebach
5 Third St
San Francisco, CA 94103

Alabama Office of the Attorney General
501 Washington Ave
Montgomery, AL 36104

Alaska Office of the Attorney General
1031 W 4th Ave Ste 200
Anchorage, AK 99501

Alexandre Zyngier
Attn: Louis A. Modugno
89 Headquarters Plaza
Morristown, NJ 07960

Allen ISD, City of Allen, Tarrant County, Dallas County
2777 N Stemmons Freeway
Suite 1000
Dallas, TX 75207

Arizona Office of the Attorney General
2005 N Central Ave
Phoenix, AZ 85004

Arkansas Office of the Attorney General
323 Center St Ste 200
Little Rock, AR 72201

AT&T
PO Box 5019
Carol Stream, IL 60197-5019

Blue Yonder, Inc.
Attn: Mark A. Salzberg
2550 M Street NW
Washington, DC 20037

BRE DDR IVA Millenia FL, LLC
PO Box 5315
Princeton, NJ 08543

Brookfield Properties Retail Inc.
350 N Orleans Street
Suite 300
Chicago, IL 60654-1607

Brookfield Properties Retail, Inc. and Terreno Realty
Attn: Robert L. LeHane, Jennifer D. Raviele, Steven Yachik
3 World Trade Center
New York, NY 10007

California Department of Tax and Fee Administration
Attn: Mark D. Silverschotz
1251 Avenue of the Americas, 42nd Floor
New York, NY 10020-1182

California Office of the Attorney General
PO Box 944255
Sacramento, CA 94244-2550

Carmichael International Service
533 Glendale Blvd
Los Angeles, CA 90026

Centennial Waterfall Willow Bend, LLC; FR Pembroke Gardens, LLC; PR
Mercato, LLC; Scottsdale Fashion Square LLC; and Westcor San Tan Village LLC
Attn: Dustin P. Branch, Jessica M. Simon, and Nahal Zarnighian
2029 Century Park East
Los Angeles, CA 90067-2915

Centennial Waterfall Willow Bend, LLC; FR Pembroke Gardens, LLC; PR
Mercato, LLC; Scottsdale Fashion Square LLC; and Westcor San Tan Village LLC
Attn: Leslie C. Heilman, Laurel D. Roglen, Nicholas J. Brannick, Margaret A.
Vesper
919 N Market Street
Wilmington, DE 19801

Colorado Office of the Attorney General
Ralph L. Carr Judicial Building
1300 Broadway, 10th Fl
Denver, CO 80203

Connecticut Office of the Attorney General
55 Elm St
Hartford, CT 06106

Connor Group International LLC
990 S Rock Blvd, Suite F
Reno, NV 89502

DC 02 - South Gate
5150 Overland Avenue
Culver City, CA 90230

Dos Lagos Squared, LLC
Attn: Michael R. Herz
49 Market St
Morristown, NJ 07960

Fashion Show Mall LLC
PO Box 86
SDS-12-2773
Minneapolis, MN 55486-2773

Federal Express (Fedex)
PO Box 72210
Pasadena, CA 91109-7321

Florida Office of Attorney General
The Capitol Pl-01
Tallahassee, FL 32399-1050

Georgia Office of the Attorney General
40 Capitol Sq SW
Atlanta, GA 30334

Giltner Logistics
PO Box 150728
Ogden, UT 84415-0728

Giltner Logistics, Inc.
919 N. Market St
Ste 1410
Wilmington, DE 19801

Google LLC
Dept 33654
PO Box 39000
San Francisco, CA 94139

Hawaii Department of the Attorney General
425 Queen Street
Honolulu, HI 96813

Idaho Office of the Attorney General
700 W. Jefferson St, Suite 210
Boise, ID 83720

Illinois Office of the Attorney General
James R. Thompson Center
100 W. Randolph St
Chicago, IL 60601

Indiana Attorney General's Office
Indiana Government Center South
302 W Washington St 5th Fl
Indianapolis, IN 46204

Inspiro Relia, Inc
6F LV Locsin Building 6752 Ayala Ave

Makati 1223
Philippines

Internal Revenue Service
2970 Market Street
Mail Stop 5-Q30.133
Philadelphia, PA 19104-5002

Iowa Office of the Attorney General
Hoover State Office Building
1305 E. Walnut Street Rm 109
Des Moines, IA 50319

Jonathan Louis International
PO Box 1036
Charlotte, NC 28201-1036

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120 SW 10th Ave 2nd Fl
Topeka, KS 66612

Kentucky Office of the Attorney General
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Room 06 13A/F South Towerworld Finance Centre
Harbour City, HK 999077
Hong Kong

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Baton Rouge, LA 70802

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Augusta, ME 04333

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Baltimore, MD 21202

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Boston, MA 02108

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Lansing, MI 48933

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St. Paul, MN 55101

Mississippi Office of the Attorney General
Walter Sillers Building
550 High St Ste 1200
Jackson, MS 39201

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Supreme Court Building
207 W High St
Jefferson City, MO 65101

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Justice Building, Third Fl
Helena, MT 59601

Montgomery County, Fort Bend County
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Houston, TX 77253-3064

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2115 State Capitol
Lincoln, NE 68509

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Old Supreme Court Building
100 N Carson St
Carson City, NV 89701

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33 Capitol St.
Concord, NH 03301

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Santa Fe, NM 87501

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The Capitol
Albany, NY 12224

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Raleigh, NC 27603

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State Capitol, 600 E Boulevard Ave Dept. 125
Bismarck, ND 58505

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State Office Tower
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Columbus, OH 43215

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Oklahoma City, OK 73105

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Attn: Shawn M. Christianson
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Oregon Department of Justice
1162 Court St NE
Salem, OR 97301

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Harrisburg, PA 17120

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2000 Renaissance Plaza
Greensboro, NC 27401

Phillips Collection, Inc.
Attn: Kyle P. McEvelly
One Gateway Center
Newark, NJ 07102

PR Mercato, LLC
Attn: Dustin P. Branch, Jessica M. Simon, Nahal Zarnighian

2029 Century Park East
Los Angeles, CA 90067-2915

PR Mercato, LLC
Attn: Leslie C. Heilman, Laurel D. Roglen, Nicholas J. Brannick, Margaret A.
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Proposed Counsel for the Official Committee of Unsecured Creditors
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Providence, RI 02903

Roseville Fountains LP
Attn: Jennifer L. Pruski

PO Box 255824
Sacramento, CA 95865

Second Paramus Associates, LLC
Attn: Donald W. Clarke, Esq.
494 Broad Street
Newark, NJ 07102

Shayne (Macao Commercial Offshore) Limited
Rua De Pequim No 126 Edif Comercial I Tak 5B
Macao
Macao

Simon Property Group
Attn: Paul J. Winterhalter
100 Eagle Rock Avenue
East Hanover, NJ 07936

Simon Property Group, Inc.
225 West Washington Street
Indianapolis, IN 46204

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Rembert C. Dennis Bldg
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Columbia, SC 29201

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Pittsburgh, PA 15251-4977

Tampa Westshore Associates LP
Attn: Francesca Lousia, Mona Jabr, Janice Sanders
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Detroit, MI 48267-1770

Tennessee Department of Revenue
PO Box 20207
Nashville, TN 37202-0207

Tennessee Office of the Attorney General
301 6th Ave N
Nashville, TN 37243

Terreno 139th LLC
2221 Rosecrans Ave. Ste 100
El Segundo, CA 90245

Texas Office of the Attorney General
300 W. 15th St
Austin, TX 78701

The Office of the Attorney General of the State of New Jersey
Richard J. Hughes Justice Complex
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Trenton, NJ 08625

The Office of the United States Attorney
970 Broad Street, Suite 700
Rodino Federal Building
Newark, NJ 07102

Unified Logistix Group
740 S. Powerline Rd Ste F
Deerfield Beach, FL 33442

United States Attorney General
United States Department of Justice
Ben Franklin Station PO Box 683
Washington, DC 20044

United States Trustee
One Newark Center, Suite 2100
Newark, NJ 07102

UPS Freight
PO Box 650116
Dallas, TX 75265-0116

US Attorney's Office for the District of Delaware
Hercules Building, Suite 400

1313 N. Market Street
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Montpelier, VT 05609

Virginia Office of the Attorney General
202 N Ninth St
Richmond, VA 23219

Washington Office of the Attorney General
1125 Washington St SE
Olympia, WA 98501

West Virginia Office of the Attorney General
State Capitol, 1900 Kanawha Blvd E
Building 1 Rm E-26
Charleston, WV 25305

Westfield LLC and Sherman Oaks Fashion Associates, LP
Attn: Niclas A. Ferland
545 Long Wharf Drive
New Haven, CT 06511

Westfield LLC and Sherman Oaks Fashion Associates, LP
Attn: Scott L. Fleischer
1270 Avenue of the Americas
New York, NY 10020

Wisconsin Attorney General's Office
114 E State Capitol
Madison, WI 53702

Wyoming Office of the Attorney General
Kendrick Building
2320 Capitol Ave
Cheyenne, WY 82002

ZG Lending SPV, LLC
Attn: Robert Hirsh, James Copeland

ZG Lending SPV, LLC
Attn: Robert Hirsh, Esq. & Phillip Kherzi, Esq.
1251 Avenue of the Americas
New York, NY 10020

Form 170 – ntchrgdsmcs

UNITED STATES BANKRUPTCY COURT

District of New Jersey
MLK Jr Federal Building
50 Walnut Street
Newark, NJ 07102

Case No.: 23–19159–SLM
Chapter: 11
Judge: Stacey L. Meisel

In Re: Debtor(s) (name(s) used by the debtor(s) in the last 8 years, including married, maiden, trade, and address):

DirectBuy Home Improvement, Inc.
dba Z Gallerie
1855 W. 139th Street
Gardena, CA 90249

Social Security No.:

Employer's Tax I.D. No.:
46–4404292

NOTICE OF HEARING ON DISMISSAL OF CASE

Notice is hereby given that:

- ☒ A Motion to Dismiss has been filed by Thomas Pope.
- ☐ An Order to Show Cause Why the Case Should Not be Dismissed concerning the issue highlighted below has been entered by the Court.
 - ☐ The debtor has not complied with the credit counseling requirements of the Bankruptcy Code.
 - ☐ The debtor is a corporation and has filed under Chapter 13 of the Bankruptcy code.
 - ☐ The corporate debtor is self–represented.
 - ☐ Other: .

A hearing to determine if there is cause for dismissal will be held by the Honorable Stacey L. Meisel on,

Date:
Time:
Location:

Dated: October 8, 2025
JAN: LVJ

Jeanne Naughton
Clerk