UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK
---x
In re:

SHELTERING ARMS CHILDREN AND FAMILY SERVICES, INC.

Debtor.
---x

Chapter 11

Case No. 24-41037 (JMM)

ORDER: (A) AUTHORIZING THE DEBTOR TO ENTER INTO AN AGREEMENT WITH METALQUEST, INC. FOR THE STORAGE AND DISPOSITION OF RECORDS; (B) DIRECTING THIRD PARTY STORAGE VENDORS TO COOPERATE IN THE TRANSFER OF RECORDS; AND (C) AUTHORIZING PAYMENT IN CONNECTION THEREWITH

Upon the Motion (the "**Motion**")[1] [**ECF 236**] of Sheltering Arms Children and Family Services, Inc. ("**Sheltering Arms**" or the "**Debtor**"**)**, as a debtor and debtor-in-possession in the above referenced Chapter 11 case (the "**Chapter 11 Case**"), for entry of an order, pursuant to Sections 105(a) and 363(b) of the Bankruptcy Code: (a) authorizing the Debtor to enter into the Lifecycle Management of Hardcopy Records and Electronic Data Agreement (the "**Records Agreement**"), a copy of which is annexed as **Exhibit A** to the Motion, with MetalQuest, Inc., ("**MetalQuest**"), providing, among other things, for the pickup, transport, cataloging, indexing, storage, maintenance, and eventual secure destruction of the Debtor's records, whether in hard copy or electronic form and including, without limitation, any hardware upon which any electronic records may be stored (collectively, the "**Records**"), some of which contain health and other protected information; (b) directing third party storage vendors to cooperate with the transfer of the Records to MetalQuest; and (c) authorizing the payment to: (i) MetalQuest for its services in accordance with the Records Agreement, and (ii) third party storage vendors in connection with:

[1] Capitalized terms used but not defined herein shall have the same meanings ascribed to them in the Motion.

(A) the retrieval and transfer of the Records to be maintained, and (B) the secure destruction of any Records which the Debtor is no longer required to maintain; all as described more fully in the Motion; and the Court having subject matter jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157(a) and 1334(b); and the Motion being a core proceeding under 28 U.S.C. § 157(b)(2); and venue being proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided with respect to the relief granted herein as set forth in the Motion; and no other or further notice needing to be provided except as set forth herein; and the relief requested in the Motion and granted herein being in the best interests of the Debtor, its estate and its creditors; and just cause having been established for the relief requested herein; and upon the Pincus Affidavit; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor;

NOW, THEREFORE, IT IS HEREBY:

ORDERED, that the Motion is granted to the extent set forth herein; and it is further

ORDERED, that the Debtor is authorized, but not directed, to enter into the Records Agreement with MetalQuest; and it is further

ORDERED that all third party storage vendors who hold the Debtor's Records, including, but not limited to, the Third Party Vendors, are directed to cooperate with the retrieval and transfer of the Records to MetalQuest and the secure destruction of any Records which the Debtor is no longer required to maintain, as directed by the Debtor; and it is further

ORDERED that the Debtor is authorized, but not directed, to make payments to: (a) MetalQuest for its services in accordance with the Records Agreement, and (b) third party storage vendors in connection with the retrieval, transfer, and/or secure destruction, as applicable, of the Records to MetalQuest; and it is further

ORDERED, that the Debtor is authorized, but not directed, to take any and all additional necessary and appropriate actions to implement and effectuate the relief granted in this Order, including, without limitation, the retrieval, transfer and/or secure destruction of the Records; and it is further

ORDERED, that the fourteen (14) day stay set forth in Bankruptcy Rule 6004(h) is hereby waived with respect to this Order and that the terms and conditions of this Order shall be immediately effective and enforceable upon entry of this Order; and it is further

ORDERED, that this Court shall retain jurisdiction over any matter or dispute arising from, or relating to, the interpretation or implementation of this Order.

Dated: November 23, 2025
Brooklyn, New York

United States Bankruptcy Court Eastern District of New York

Jil Mazer-Marino
United States Bankruptcy Judge