UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK
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In Re	Case No. 24-41047
Sheltering Arms Children and Family Services Inc.	Chapter 11
Debtor	Honorable Jill Mazer Marino

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ORDER GRANTING MOTION OF THE CHILD VICTIMS SEX ABUSE CREDITORS FOR ENTRY OF AN ORDER PURSUANT TO BANKRUPTCY RULE 2004 AUTHORIZING AND DIRECTING THE PRODUCTION OF DOCUMENTS BY THE DEBTOR

This matter coming before the Court on the Motion by Herman Law firm for an *Entry of an Order Pursuant to Bankruptcy Rule 2004 Authorizing and Directing the Production of Documents by the Debtor and Joint Debtor.* (the "Motion"); the Court having reviewed and considered the Motion and accompanying papers; an no opposition having been received to the Motion and after due deliberation; the Court having found and concluded that the Motion has established sufficient cause for the relief granted herein; and no additional notice being required except as set forth herein,

IT IS HEREBY ORDERED:

1. The Motion is **GRANTED** pursuant to Fed. Rule of Bankr. P 2004 for the Survivors.
2. Herman Law firm is authorized to issue a subpoena to the Debtor for the production of records and documents as described in Exhibit A-1 to the Motion, with the production of records and documents to be made to the firm withing thirty (30) days of service of the subpoena or on such other date as may be agreed by the parties.
3. The foregoing is without prejudice to the assertion of any applicable privilege, provided that if the Debtors withholds production of a document on the basis of an asserted privilege it shall provide a privilege log setting forth a description (including date, author,

and intended recipient) of the withheld document and the basis for the privilege asserted, including citation to any applicable rule.

4. Nothing contained herein shall prejudice Herman Law firm, on behalf of the Survivors, under the Federal Rules of Bankr. P. 2004 and other applicable laws to seek further document productions and written or oral examination in connection with the case.

5. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation of this Order.

Dated: February 19, 2026
Brooklyn, New York

Jil Mazer-Marino
United States Bankruptcy Judge

EXHIBIT A-1

(Document Requests)

EXHIBIT A

Requests for Production of Documents to Sheltering Arms Children and Family Services Inc.

INSTRUCTIONS

A. Unless otherwise specified, each request seeks DOCUMENTS dated or created during the twenty (20) years prior to the PETITION DATE, but HERMAN LAW reserves the rights to request older Documents after receiving DOCUMENTS responsive to these requests.

B. Please bates number each page of each DOCUMENT that YOU produce.

C. YOU are required to conduct a thorough investigation and produce all DOCUMENTS (as defined below) in YOUR possession, custody and control.

D. All/Any/Each. The terms "all", "any", and "each" shall each be construed as encompassing any and all.

E. And/Or. The connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

F. The use of the singular form of any word includes the plural and vice versa.

G. If YOU are unable to comply with a particular category(ies) of the requests below and DOCUMENTS responsive to the category are in existence, state the following information:

1. The date of the DOCUMENT;
2. The type of DOCUMENT (e.g., letter, memorandum, report, etc.);
3. The name, address, telephone number and title of the authors(s) of the DOCUMENT;
4. The name, address, telephone number and title of EACH recipient of the DOCUMENT;
5. The number of pages in the DOCUMENT;
6. The Document Control number if any;
7. The present location(s) of the DOCUMENT and the name, address and telephone number of the person(s) who has (have) possession of the DOCUMENT;
8. A specific description of the subject matter of the DOCUMENT;
9. The reason why the DOCUMENT cannot be produced or why you are unable to comply with the particular category of request.

H. YOU are under a continuing duty to amend YOUR written response and to produce additional DOCUMENTS if you lean that the response or production is incomplete or incorrect in any material respect, and if the additional or corrective information has not otherwise been made known to the Herman Law Firm during the discovery process or in writing.

I. YOU are required to produce the full and complete original, or copies if the originals are unavailable, of each DOCUMENT responsive to the categories below along with all non-identical copies and drafts in their or their entirety, without abbreviations, except, or redactions. A copy may be produced in lieu of originals if the entirety (front and back where appropriate) of the DOCUMENTS is reproduced and YOU state by declaration under penalty of perjury that the copy provided is a true, correct, complete and accurate duplication of the original.

J. YOU are required to produce the DOCUMENTS as they are kept in the usual course of business, or to organize and label them to correspond with each category in these requests.

K. For ELECTRONCIALLY STORED INFORMATION ("ESI"):

1. Herman Law Firm seeks to discuss with the Debtor and/or Producing Party to whom these requests are directed (a) potential search term for ESI responsive to each Request; (b) the potential custodians of ESI responsive to each Request and (c) the devices to be search for ESI responsive to each request.

2. Produce DOCUMENTS in accordance with the instructions to be provided.

3. Maintain family integrity.

4. Perform custodian level de-duplication.

5. Produce a DAT load file with following metadata fields: Beginning Production Number, Ending Production Number, Beginning Attachment Number, End Attachment Number, Family ID, Page Count, Custodian, Original Location Path, Email Folder Path, Document Type, Document Author, Doc Last Author, Time Created, Date Last Accessed, Date Sent, Time Sent, Date Received, To, From, Cc, BCC, Email subject.

L. If YOU withhold or redact a portion of any DOCUMENT under a claim of privilege or other protection, then the document must be identified on a privilege log, which shall be produced contemporaneously with the non-privileged DOCUMENTS responsive to this Request for Production, and which privilege log shall state the following information:

1. The Date of the DOCUMENT;
2. The type of DOCUMENT (e.g. letter, memorandum, report, etc.);

3. The name, address, telephone number, and title of the author(s) of the DOCUMENT;
4. The name, address, telephone number and title of each recipient of the DOCUMENT;
5. The number of pages in the DOCUMENT;
6. The document control number, if any;
7. The present location(s) of the DOCUMENT and the name, address, and telephone number of the person(s) who has (have) possession of the DOCUMENT;
8. A general description of the subject matter of the DOCUMENT or the portion redacted without disclosing the asserted privilege or protected communication;
9. The specific privilege(s) or protection(s) that YOU contend applies.

DEFINITIONS

1. "ABUSE CLAIM" means any CLAIM against the Debtor brought pursuant to the New York Child Victims Act, CPLR 214-g, or otherwise arising from "childhood sex abuse" or "childhood physical abuse" as those terms are defined by 255.27, 255.26 and 255.25 of the New York Penal Law committed against a child less than eighteen years of age, or the use of a child in a sexual performance as defined in section 263.05 of the New York Penal Law.
2. "AFFILIATES" refers to any social and community service organization operating within or under the control Sheltering Arms Children and Family Services, Inc.
3. "BANKRUPTCY CASE" refers to the bankruptcy case styled *Sheltering Arms Children and Family Services Inc.* filed in the United States Bankruptcy Court of the Eastern District of New York Case No. 24-41037(jmm).
4. "CLAIM" means any "claim" as define by 11 U.S.C §101(5).
5. "COMMUNICATION" means the transmittal of information (in the form of facts, ideas, inquiries or otherwise).

6. "DOCUMENT" is synonymous in meaning and equal in scope to the usage of the term "document or electronically stored information" in the Federal Rules of Civil Procedure 34(a)(1)(A). A draft or non-identical copy is a separate document within the meaning of this term. A DOCUMENT includes written COMMUNICATION.
7. "EVIDENCING" has the same meaning as RELATING TO.
8. "IDENTIFY" and "IDENTIFYING" shall have the following meanings:
    a. *With respect to PERSONS*: When referring to a PERSON, "to identify" means to give, to the extent known, the PERSON'S full name, present and last known address; and when referring to a natural person, additionally, the present or last known place of employment. Once a PERSON has been identified in accordance with this definition, only the name of that PERSON need to be listed in response to subsequent discovery requesting the IDENTIFICATION of that person.
    b. *With respect to DOCUMENTS*: When referring to DOCUMENTS, "to identify" means to give, to the extent known, the (i) type of DOCUMENT; (ii) general subject matter; (iii) the date of the DOCUMENT; and (iv.) author(s) addressee(s) and recipient(s). In the alternative, YOU may produce the DOCUMENTS, together with identifying information sufficient to satisfy Federal Rule of Civil Procedure 33(d).
9. "INSURANCE POLICIES" means any and all insurance policies issued to YOU or any of your AFFILIATE(S) to which YOU could make a CLAIM in the proceeds thereof, including as an insured, a named insured, additional insured or otherwise. INSURANCE

POLICIES also includes any similar contract for the transfer of risk or the sharing of risk issued to, or entered into by, YOU or any of your AFFILIATE(S).

10. “INSURER” refers to any insurer who issued a policy to anyone identified as being insured by the insurance company.
11. “PERSONAL PROPERTY” means tangible and intangible assets other than REAL PROPERTY.
12. “PERSONS” is any natural person, juridical person, or any legal entity, including, without limitation, any business, religious, or governmental entity or association.
13. “PETITION DATE” means March 7, 2024.
14. “REAL PROPERTY” means land and immovable property on land such as buildings.
15. “RELATING TO” means concerning, referring to, describing, evidencing or constituting.
16. “SEXUAL ABUSE” means conduct giving rise to an ABUSE CLAIM.
17. “SURVIVOR” refers to a natural PERSON who has or had an ABUSE CLAIM.
18. “TRUST” means a legal entity under a TRUST AGREEMENT naming as a party YOU and /or any AFFILIATE.
19. “TRUST AGREEMENT” means to a written or oral arrangement that evidence, or purports to evidence a TRUST, and includes declarations of trust and all amendment to such arrangements.
20. “YOU” means Sheltering Arms Children and Family Services, Inc.

DOCUMENT REQUESTS

Financial Information

1. Copies of electronic accounting or management system(s) (e.g. Acumatica, Epicor, QuickBooks, Navision, Financial Edge, FIMS) RELATING TO the debtors and their AFFILIATE(S).
2. Annual (audited, complied, reviewed or unaudited) and monthly (unaudited) financial statements (including balance sheet, income statement, and statement of cash flow), including accompanying notes and disclosures of the debtors. For unaudited annual or monthly financial statements, please provide the date in Excel (e.g., balance sheets, income statements, cash flow).
3. Chart(s) of accounts (including open/active accounts, closed/ inactive accounts, departments, divisions, segments, projects, programs etc.) for debtors and their AFFILIATE(S).
4. ALL DOCUMENTS RELATING TO any secured and unsecured debt, line of credit, loan payable, note payable, or guarantee by the debtors and their AFFILIATE(S) for the 25 years prior to the PETITON DATE.
5. Copies of all auditor workpapers and "Prepared By Client" or documentation RELATING TO the debtors and any AFFILIATE(S).
6. COMMUNICATIONS RELATING TO the financial audit process of the debtors and any AFFILIATE(S), including all management letters and letters of representation.
7. ALL DOCUMENTS RELATING TO transfers, individually over $50,000 or cumulatively over $100,000 between or among the debtors and their AFFILIATE(S) during the past three (3) years.

8. ALL DOCUMENTS RELATING TO bank, money market, investment, brokerage, credit card or other accounts of each debtor including account creation documents, signature cards, account statements, wire advises, deposit slips, check copies, debit memos, and credit memos. In regard to account creation documents (including signature cards) for the 25 years prior to the PETITION DATE.
9. Monthly budgets for all departments, divisions, segments, agencies (or similar units) of the debtor along with budget versus actual variance reports.
10. All business plans and associated financial projections prepared by or for the debtors.

Personal Property

1. ALL PERSONAL PROPERTY inventories (including listings or schedules) from the 25 years prior to the PETITION DATE, including inventory of insurance documents (e.g. listings of in-force values, replacement costs, statement of value), prepared for the debtors and their AFFILIATES.
2. Any appraisals or valuation reports of PERSONAL PROPERTY, owned during the 25 years prior to the PETITION DATE, by the debtors and/or their AFFILIATES.

Insurance

1. ALL DOCUMENTS EVIDENCING insurance coverage for the debtors and their AFFILIATES, including the existence of actual, possible, and/or missing INSURANCE POLICIES.
2. Copies of all general liability INSURANCE POLICIES, under which the debtors assert a CLAIM or in which a debtor member, board or AFFILIATE(S) asserts an interest in the proceeds.

3. True and Correct copies of all DOCUMENTS EVIDENCING COMMUNICATION by any Debtor, member, board, trustee or AFFILIATE(S), regarding insurance coverage for ABUSE CLAIMS. This request includes but is not limited to reservation-of-right letters, denial letters, correspondence between or amount any debtor, member, board, trustee regarding insurance coverage for ABUSE CLAIMS, and correspondence between any debtor, member, board, trustee, AFFILIATE(S) and an INSURER.
4. ALL DOCUMENTS EVIDENCING defense costs paid by INSURERS for ABUSE CLAIMS. This request includes but is not limited to amounts paid by INSURERS and amounts due by INSURERS.
5. ALL DOCUMENTS RELATING TO any "insurance buyback" including but not limited to COMMUNICATIONS between any debtors' member, trustee, board and any INSURER and between and amount any debtor's member, trustee, board, negotiations, settlement drafts, the buyback agreement(s) exhibits, amendments, to or subsequent communications relating to the buyback agreement(s) and insurance policies covered by such agreement.

Abuse Claims

1. ALL DOCUMENTS RELATING TO ABUSE CLAIMS alleged to have taken place since January 1, 1975, regardless of whether allegations of SEXUAL ABUSE were deemed credible or substantiated. This Request includes allegations against living and deceased PERSONS.
2. All lists, or partial or draft list of all PERSONS accused of SEXUAL ABUSE since January 1, 1975, and for whose actions the debtors maybe responsible or liable. This Request is not limited to "credible accusations".

3. All personnel files and records, including, without limitation, work assignment histories, work performance evaluations, correspondence, and disciplinary records RELATING TO every PERSON accused of SEXUAL ABUSE, who has operated for the debtors and their AFFILIATE(S) since January 1, 1975. This Request is not limited to "credible accusations."
4. ALL DOCUMENTS RELATING TO any complaints, allegations, or reports that the Debtors and/or their AFFILIATE(S), violated or failed to comply with any local or state child sexual abuse reporting requirements, including but not limited to, correspondence, reports, complaints and disciplinary records during the 25 years prior to the PETITON DATE.
5. ALL DOCUMENTS RELATING TO the debtors and/or any AFFILIATE(S) settlement of then-existing ABUSE CLAIMS (including settlement agreements with SURVIVORS, whether or not "confidential") during the 25 years prior to the PETITION DATE.
6. DOCUMENTS sufficient to IDENTIFY the amount and sources of funds the debtors used to pay settlement of ABUSE CLAIMS.
7. ALL COMMUNICATION RELATING TO ABUSE CLAIMS by the debtors and/or any AFFILIATE, with any of the following PERSONS: any state or federal governmental agency, authority, or entity, including without limitation district attorneys', offices, police departments, the United States Department of Justice, or any law enforcement agency. This Request seeks responsive COMMUNCIATION, during the 25 years prior to the PETITON DATE.

8. ALL DOCUMENTS RELATING TO subpoenas from any governmental agency or entity (local, state, federal) direct to or served on YOU RELATING TO the issue of SEXUAL ABUSE, including written responses and DOCUMENTS productions.