

UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION

IN RE: : CHAPTER 11
:
MV REALTY PBC, LLC, *et al.*, : CASE NO. 23-17590-EPK
:
Debtors. : (Jointly Administered)

UNITED STATES TRUSTEE’S RULE 26(a)(1) INITIAL DISCLOSURES

The United States Trustee for Region 21 (the “United States Trustee”) discloses the following information, pursuant to Fed. R. Civ. P. 26(a)(1), made applicable through Fed. R. Bankr. P. 9014 and Fed. R. Bankr. P. 7026, as ordered by this Court in its *Order Setting Evidentiary Hearing on and Related Deadlines in Contested Matter* [ECF No. 1243]:

I. **DISCLOSURES PURSUANT TO FED. R. CIV. P. 26(a)(1)(A)(i)**

(i) the name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment

Name, Address, and Telephone Number	Likely Subjects of Discoverable Information
Corporate Representative MV Realty Holdings, LLC 815 Broken Sound Parkway Suite 140 Boca Raton, FL 33487 (866) 484-3824	The corporate representative of MV Realty Holdings, LLC has knowledge of MV Realty PBC, LLC, and the jointly administered debtors (“ <u>MV</u> ”) ¹ , its operations, transactions and agreements with third parties, any payments made, or obligations imposed, pursuant to such agreements.

¹ The debtors in this jointly administered case are MV Realty PBC LLC, MV Realty Holdings, LLC, MV Receivables II, LLC, MV Receivables III, LLC, MV Realty PBC, LLC (Pennsylvania), MV Realty of South Carolina, MV Realty of North Carolina, LLC, MV of Massachusetts, LLC, MV Realty of Illinois, LLC, MV Realty of Arizona, LLC, MV Realty of Connecticut, LLC, MV Realty of Georgia, LLC, MV Realty of New Jersey, LLC, MV Realty of Washington, LLC, MV Realty of Maryland, LLC, MR Realty of Virginia, LLC, MV Realty of Tennessee, LLC, MV Realty of Wisconsin, LLC, MV Realty of Nevada, LLC, MV Realty of Oregon, LLC, MV Realty of Utah, LLC, MV Realty of Minnesota, LLC, MV Realty of Indiana, LLC, MV Realty of Missouri, LLC, MV Homes of New York, LLC, MV Realty of Idaho LLC, MV Realty of Alabama, LLC, MV Realty of Colorado, LLC, MV Realty of Oklahoma, LLC, MV Realty of Louisiana, LLC, MV Realty of Kansas, LLC, MV Realty of Kentucky, LLC, MV Realty of California, MV Realty of Texas, LLC, MV Realty of Michigan, LLC and MV Realty of Ohio, LLC.

Chief Executive Officer MV Realty Holdings, LLC 815 Broken Sound Parkway Suite 140 Boca Raton, FL 33487 (866) 484-3824	The corporate representative of MV Realty Holdings, LLC has knowledge of MV, its operations, transactions and agreements with third parties, any payments made, or obligations imposed, pursuant to such agreements.
Antony Mitchell Manager and Board Member, MV Realty Holdings, LLC Chief Executive Officer, MV Realty PBC, LLC 815 Broken Sound Parkway Suite 140 Boca Raton, FL 33487 (866) 484-3824	Mr. Mitchell has knowledge of the finances, business affairs and other matters related to MV.
Cristina Johnson Chief Accounting Officer MV Realty PBC, LLC 815 Broken Sound Parkway Suite 140 Boca Raton, FL 33487 (866) 484-3824	Ms. Johnson has knowledge of MV's finances, business affairs and other matters related to MV.
David Manchester Board Member MV Realty PBC, LLC 815 Broken Sound Parkway Suite 140 Boca Raton, FL 33487 (866) 484-3824	Mr. Manchester has knowledge of MV's finances, business affairs and other matters related to MV.
Steven Scott Senior Vice President MV Realty PBC, LLC 815 Broken Sound Parkway Suite 140 Boca Raton, FL 33487 (866) 484-3824	Mr. Scott has knowledge of MV's finances, business affairs and other matters related to MV.

Amanda Zachman Board Member MV Realty PBC, LLC 1451 W Cypress Creek Rd Suite 300 Fort Lauderdale, FL 33309 (866) 484-3824	Ms. Zachman has knowledge of MV's finances, business affairs and other matters related to MV.
Corporate Representative Goodwood, Inc. 132 Trafalgar Road Oakville, ON L6J 3G5 (416) 203-2022	The corporate representative of Goodwood, Inc., has knowledge of the agreements with MV, and any payments made, or obligations imposed, pursuant to such agreements.
Corporate Representative Goodwood MVR Investors, Inc. 200 S. Biscayne Blvd. Suite 4100 Miami, FL 33131	The corporate representative of Goodwood MVR Investors, Inc. has knowledge of the agreements with MV, and any payments made, or obligations imposed, pursuant to such agreements.
Corporate Representative Monroe Capital Management Advisors, LLC 311 South Wacker Drive, 64th Floor Chicago, Illinois 60606 (312) 258-8300	The corporate representative of Monroe Capital Management Advisors, LLC, has knowledge of agreements with MV, and any payments made, or obligations, imposed pursuant to such agreements.
Scott Mager Grant Thornton, LLP 1301 International Parkway Suite 300 Fort Lauderdale, FL 33323 (954) 768-9900	Mr. Mager and the firm analyzed financial documents provided by MV, operating reports, balance sheets, and financial statements and prepared audited statements.
Robert Lynch Auditor Office of the United States Trustee 400 W. Washington Street Suite 1100 Orlando, FL 32801 (407) 648-6287	On behalf of the United States Trustee, Mr. Lynch has analyzed court pleadings, and business and financial documents provided by MV, including but not limited to monthly operating reports, balance sheets, and financial statements.
Jordan Lazarus CPA, CFE, CFF Kroll, LLC 55 East 52nd Street, 17th Floor New York, NY 10055 (215) 568-8239	On behalf of the Official Committee of Home Benefit Agreement Holders, Mr. Lazarus has analyzed court pleadings, and business and financial documents provided by MV, including but not limited to monthly operating reports, balance sheets, and financial statements.

Pamela J. Parizek Kroll, LLC 55 East 52nd Street, 17th Floor New York, NY 10055 (212) 871-2000	On behalf of the Official Committee of Home Benefit Agreement Holders, Ms. Parizek has analyzed court pleadings, and business and financial documents provided by MV, including but not limited to monthly operating reports, balance sheets, and financial statements.
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II. DISCLOSURES PURSUANT TO FED. R. CIV. P. 26(a)(1)(A)(ii)

<i>(ii) a copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment</i>	
Document Description	Location
All documents filed in MV's bankruptcy cases	United States Bankruptcy Court Southern District of Florida 1515 N. Flagler Drive Suite 801 West Palm Beach, FL 33401
Bankruptcy dockets for MV's bankruptcy cases	United States Bankruptcy Court Southern District of Florida 1515 N. Flagler Drive Suite 801 West Palm Beach, FL 33401
Any documents provided by MV to the United States Trustee	Office of the United States Trustee 51 SW First Avenue Suite 1204 Miami, FL 33130
All documents provided by MV in response to the United States Trustee's discovery requests	Office of the United States Trustee 51 SW First Avenue Suite 1204 Miami, FL 33130

III. DISCLOSURES PURSUANT TO FED. R. CIV. P. 26(a)(1)(A)(iii)

(iii) a computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered

The United States Trustee has no disclosure pursuant to Fed. R. Civ. P. 26(a)(1)(A)(iii) as the United States Trustee is not asserting a claim for damages in this contested matter.

IV. DISCLOSURES PURSUANT TO FED. R. CIV. P. 26(a)(1)(A)(iv)

(iv) for inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment

The United States Trustee has no disclosure pursuant to Fed. R. Civ. P. 26(a)(1)(A)(iv) as the United States Trustee does not have any insurance agreement with any insurance business that may be liable to satisfy all or part of a possible judgment.

The United States Trustee reserves her right to supplement her disclosures.

Dated: May 1, 2024

MARY IDA TOWNSON
United States Trustee

/s/ Heidi A. Feinman
HEIDI A. FEINMAN
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* I hereby certify that I am admitted to the Bars of the States of Georgia and New York and that I am excepted from additional qualifications to practice in this Court pursuant to Local Rule 9011-4 pertaining to attorneys representing the United States government.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused a true and correct copy of the foregoing to be furnished via electronic mail to the following on May 1, 2024:

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I hereby certify that I am admitted to the Bar of the United States District Court for the Southern District of Florida, and I am in compliance with the additional qualifications to practice in this court set forth in Local Rule 2090-1(A).

/s/ Heidi A. Feinman
Assistant United States Trustee