

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

In re:

BIRD GLOBAL, INC. *et al.*,

Debtors.

Chapter 11

Case Number 23-20514-CLC

(Jointly Administered)

**TORT CLAIMANTS' JOINDER IN DONNA JACKSON TCHIRKOW'S OBJECTION
TO DEBTORS' SECOND AMENDED JOINT CHAPTER 11 PLAN OF LIQUIDATION**

Dunya Abbo, Michael Allen, Natalie Armenta, Jill Asrael, Christopher Atwood, Lisa Beardslee, Holly Bittinger, Crystal Camposano, Robyn Cardy, Kalonji Cason, Kimberly Chartrand, Mirona Constantinescu, Beau Cullen, Christopher Dacey, Richard Davis, Clarina Durham, Jason Evangelou, Bianca Faura, Sylvia Fico, Jennifer Glaspell, Michael Graham, Elizabeth Helms, Kiara Hudson, Jorge Hurtado, Fahin Kamrany, Alexandra Kozel, Grace LaCrosse, Paul Lee, Carlos Lemus, Kimberly Leonard, Hector Martin, Brandon Mitchell, Kim Mulligan, Brandon Nelson, Thomas Olivas, Brian Olshevski, Joseph Payne, Renea Rice, Akeem Robinson, Perry Rubenstein, Lawrence Russo, Alexandra Scoggin, Andrea Silva, Annemarie Spitz, Tracy Squire, Jessie Trinh, Kim Youngbean, Lori Urban, Joanne Vizzini, Deborah West, Maria Wiegering, and Ziwei Zhu (collectively, the above-listed creditors shall be referred to as the "***Tort Claimants***"), by and through their undersigned counsel, file this Joinder to *Donna Jackson Tchirkow's Objection to Debtors' Second Amended Joint Chapter 11 Plan of Liquidation* [ECF No. 911], and joins and adopts the arguments and recitations of case law as set forth therein.

As stated in *Tort Claimants' Objection to Debtors' First Amended Joint Plan and First Amended Disclosure Statement* [ECF No. 779], the Tort Claimants reserve the right to raise other

and further objections to the Plan, including any amendments, modifications, and supplements thereto, and to respond to any new or additional information provided by the Debtors or others that becomes available. To the extent applicable, the Tort Claimants join in any other objections to confirmation of the Plan filed or raised by Holders of Tort Claims in advance of or at the Confirmation Hearing.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of *Tort Claimants' Joinder to Donna Jackson Tchirkow's Objection to Debtors' Second Amended Joint Chapter 11 Plan of Liquidation* was served on June 9, 2024, via the Court's Notice of Electronic Filing upon the Registered Users listed on the attached **Exhibit 1** and via email to these parties:

Gordon E. Gouveia GGouveia@foxrothschild.com

Hugh Murtagh Hugh.Murtagh@lw.com

Greg Mast gmast@fieldshowell.com

s/Meaghan E. Murphy
Meaghan E. Murphy, Esquire
Florida Bar No. 102770
mmurphy@melandbudwick.com
MELAND BUDWICK, P.A.
3200 Southeast Financial Center
200 South Biscayne Boulevard
Miami, Florida 33131
Telephone: (305) 358-6363
Facsimile: (305) 358-1221

Attorneys for the Tort Creditors

EXHIBIT 1**Electronic Mail Notice List**

The following is the list of **parties** who are currently on the list to receive email notice/service for this case.

- **Vincent F Alexander** valexander@shutts.com, SLall@shutts.com
- **Joel M. Aresty** aresty@mac.com
- **Paul A Avron** pavron@bergersingerman.com, efile@bergersingerman.com; efile@ecf.inforuptcy.com
- **Paul J. Battista** pjbattista@venable.com, cascavone@venable.com; jnunez@venable.com; imalcolm@venable.com; heburke@venable.com; imalcolm@ecf.courtdrive.com
- **Steven M Berman** sberman@slk-law.com, choffman@shumaker.com; lhutton@shumaker.com
- **Robert J. Bigge Jr.** brpa@biggerodriguez.com, biggerr72292@notify.bestcase.com
- **David Blansky** dblansky@dunnlawpa.com, rbasnueva@dunnlawpa.com
- **Matthew C Brown** mbrown@whitecase.com, avenes@whitecase.com; mco@whitecase.com
- **Eve A Cann** ecann@bakerdonelson.com, lbettencourt@bakerdonelson.com; nleone@bakerdonelson.com; flservice@bakerdonelson.com
- **Nathan A Carney** ncarney@carneylawfirm.com, tholtsclaw@carneylawfirm.com
- **Shawn M Christianson** schristianson@buchalter.com, cmcintire@buchalter.com
- **Carmen Contreras-Martinez** carmen.contreras-martinez@saul.com, aida.mclaughlin@saul.com; mia-ctdocs@saul.com
- **Raniero D'Aversa** rdaversa@orrick.com, BirdTeam@orrick.com
- **Lee W Davis** lee@leewdavis.com
- **Matthew G Davis** mdavis@pdtlegal.com, jdorta@pdtlegal.com
- **John L Dicks, II** john.dicks@akerman.com, judy.mcarthur@akerman.com
- **Patrick R Dorsey** pdorsey@slp.law, dwoodall@slp.law; pmouton@slp.law; pdorsey@ecf.courtdrive.com
- **Robert F. Elgidely** relgidely@foxrothschild.com, EAccetta@foxrothschild.com; rsolomon@foxrothschild.com; FL.DKT@foxrothschild.com

- **Raye C Elliott** raye.elliott@akerman.com, jennifer.meehan@akerman.com;ava.hill@akerman.com
- **Janelle L Esposito** janelle@espositolegal.com, docreview@espositolegal.com
- **Dale A Evans** dale.evans@lockelord.com, tina.sullivan@lockelord.com
- **Carly Everhardt** carly.everhardt@klgates.com
- **Brian T FitzGerald** fitzgeraldb@hillsboroughcounty.org, connorsa@hillsboroughcounty.org;stroupj@hillsboroughcounty.org
- **David L. Gay** dgay@carltonfields.com, cguzman@carltonfields.com;efile@ecf.inforuptcy.com;miaecf@cfdom.net
- **Gregory S Grossman** ggrossman@sequorlaw.com, ngonzalez@sequorlaw.com;arodriguez@sequorlaw.com
- **Jordi Gusó** jguso@bergersingerman.com, fsellers@bergersingerman.com;efile@bergersingerman.com;efile@ecf.inforuptcy.com
- **Hayley G Harrison** hharrison@wernicklaw.com, jmiranda@bastamron.com;kszolis@bastamron.com;mdesvergunat@bastamron.com;mdesvergunat@bastamron.com
- **Samuel W Hess** shess@slp.law, dwoodall@slp.law;pmouton@slp.law;shess@ecf.courtdrive.com
- **John B. Hutton III** huttonj@gtlaw.com, mialitdock@gtlaw.com;miaecfbky@gtlaw.com;perezan@gtlaw.com;perezan@gtlaw.com
- **Jamie Z Isani** jisani@hunton.com, mplantada@hunton.com
- **Eric D Jacobs** edjacobs@venable.com, btraina@venable.com,btraina@ecf.courtdrive.com,tpetrie@venable.com;imalcolm@venable.com;ipmalcolm@venable.com;imalcolm@ecf.courtdrive.com
- **Jerry M Markowitz** jmarkowitz@mrthlaw.com, ycandia@mrthlaw.com,rrubio@mrthlaw.com,mrthbkc@gmail.com,gruiz@mrtlaw.com,markowitzjr73991@notify.bestcase.com,jmarkowitz@ecf.courtdrive.com,msalazar@mrthlaw.com
- **David B Marks** brett.marks@akerman.com, charlene.cerda@akerman.com
- **Jeffery Thomas Martin** jeff@martinlawgroupva.com, brittany@martinlawgroupva.com
- **Richard J McIntyre** rich@mcintyrefirm.com, Nichola@mcintyrefirm.com;deeann@mcintyrefirm.com
- **Aimee Melich** service@melichlaw.com;10963@notices.nextchapterbk.com
- **Juan J Mendoza** jmendoza@sequorlaw.com, ngonzalez@sequorlaw.com
- **Meaghan E Murphy** mmurphy@melandbudwick.com, ltannenbaum@melandbudwick.com;mrbnefs@melandbudwick.com;ltannenbau

m@ecf.courtdrive.com;phornia@ecf.courtdrive.com;mmurphy@ecf.courtdrive.com

- **Martin P Ochs** martin.p.ochs@usdoj.gov
- **Office of the US Trustee** USTPRegion21.MM.ECF@usdoj.gov
- **Kelly H Papa** kpapa@coj.net
- **Julie Anne Parsons** jparsons@mvbalaw.com, kalexander@mvbalaw.com
- **Leanne McKnight Prendergast** Leanne.Prendergast@pierferd.com, l3annemp@gmail.com
- **Jose L. Ramirez-Coll** jramirez@amrclaw.com
- **David A Ray** dray@draypa.com, draycmecf@gmail.com;simone.draypa@gmail.com
- **Jason S Rigoli** jrigoli@furrcohen.com, yfernandez@furrcohen.com;staff1@furrcohen.com;ltitus@furrcohen.com
- **Dana Lee Robbins** drobbins@burr.com, mguerra@burr.com
- **Clay B Roberts** croberts@bergersingerman.com, efile@bergersingerman.com;efile@ecf.courtdrive.com
- **Alan R Rosenberg** arosenberg@mrthlaw.com, gruiz@mrthlaw.com,jgarey@mrthlaw.com,ycandia@mrthlaw.com,mrthbkc@gmail.com,msalazar@mrthlaw.com
- **Robin J. Rubens** rrubens@bergersingerman.com, efile@ecf.inforuptcy.com;efile@bergersingerman.com
- **Armando P Rubio** arubio@fieldshowell.com, service@fieldshowell.com
- **Rachel Lopate Rubio** rrubio@mrthlaw.com, ycandia@mrthlaw.com;mrthbkc@gmail.com;ecfnotices@mrthlaw.com;gruiz@mrthlaw.com;rrubio@ecf.courtdrive.com
- **Diane W Sanders** austin.bankruptcy@lgbs.com
- **Melgene Castillo Shoemake** mshoemake@simonattys.com
- **Bradley S Shraiberg** bss@slp.law, dwoodall@slp.law;dwoodall@ecf.courtdrive.com;pmouton@slp.law
- **Paul Steven Singerman** singerman@bergersingerman.com, efile@bergersingerman.com;efile@ecf.courtdrive.com
- **Howard Peter Slomka** howie@slomka.us
- **Steven J. Solomon** steven.solomon@gray-robinson.com, Ana.Marmanillo@gray-robinson.com
- **Peter D. Spindel** peterspindel@gmail.com, peterspindelcmecf@gmail.com
- **Kevin Arthur Stine** kstine@bakerdonelson.com
- **Seth P Traub** traub@shumaker.com, dborden@slk-law.com
- **Barry Seth Turner** bt@bstpa.com, bstpalaw@gmail.com
- **Katelyn Michele Vinson** kvinson@jennislaw.com, ecf@jennislaw.com;karon@jennislaw.com

- **Aaron M. Waite** aaronmwaite@agutah.gov
- **Stuart F Wilson-Patton** stuart.wilson-patton@ag.tn.gov