

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
ABERDEEN DIVISION**

IN RE:

UNITED FURNITURE INDUSTRIES, INC.,
aka United Furniture, *aka* Lane Furniture

Debtor.

Chapter 11

Case No. 22-13422-SDM

TORIA NEAL; JAMES PUGH; and KALVIN
HOGAN, on behalf of themselves and all
others similarly situated,

Plaintiffs.

Adversary Proc. No. 23-01005-SDM

- against -

UNITED FURNITURE INDUSTRIES, INC.;
DAVID BELFORD individually and as
Trustee for SEPARATE PROPERTY TRUST
CREATED BY DAVID BELFORD and
DAVID A. BELFORD IRREVOCABLE
TRUST; and STAGE CAPITAL, LLC,

Defendants.

CERTIFICATE OF SERVICE

I, Geoffrey S. Trotier, do hereby certify that on April 8, 2025, I caused to be emailed a true and correct copy of the Non-Employer Defendants' Trial Exhibit List and corresponding Exhibits DB-1 to DB-113 to all parties required to be served under the Federal Rules of Bankruptcy Procedure [copy attached].

DATED: April 8, 2025

HUSCH BLACKWELL LLP

By: /s/ Geoffrey S. Trotier

Geoffrey S. Trotier

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**Attorney for Stage Capital, LLC,
David A. Belford, individually
The David A. Belford Separate Property Trust
The David A. Belford Irrevocable Trust**

CERTIFICATE OF SERVICE

I certify that on April 8, 2025, I filed a true and correct copy of the foregoing through the Court's ECF system which sent notice to all attorneys of record as follows:

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DATED: April 8, 2025

/s/ Geoffrey S. Trotier
Geoffrey S. Trotier

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
ABERDEEN DIVISION**

IN RE: UNITED FURNITURE INDUSTRIES, INC., <i>aka</i> United Furniture, <i>aka</i> Lane Furniture Debtor.	Chapter 11 Case No. 22-13422-SDM
TORIA NEAL; JAMES PUGH; and KALVIN HOGAN, on behalf of themselves and all others similarly situated, Plaintiffs. - against - UNITED FURNITURE INDUSTRIES, INC.; DAVID BELFORD individually and as Trustee for SEPARATE PROPERTY TRUST CREATED BY DAVID BELFORD and DAVID A. BELFORD IRREVOCABLE TRUST; and STAGE CAPITAL, LLC, Defendants.	Adversary Proc. No. 23-01005-SDM

TRIAL EXHIBIT LIST

Exhibit No.	Date Offered	Marked	Admitted	Description of Exhibits
DB-1				20071113 David Belford Third Amended and Restated Separate Property Trust SCB-006256-006280
DB-2				20091216 David A. Belford Irrevocable Trust SCB-001113-001151
DB-3				20140101 Executive Management Agreement SCB-000034-000036
DB-4				20190927 Evans Employment Agreement Evans Ex. 1
DB-5				20210128 UFI and Wells Fargo Credit Agreement SCB-000249-000342
DB-6				20210128 UFI and Wells Fargo Security Agreement

				Grossman Ex. 35
DB-7				20211231 Compensation of Officers SCB-006915
DB-8				20211231 Federal Tax Returns UFI755-757
DB-9				20220404 Wells Fargo Notice of Defaults and Reservation of Rights Grossman Ex. 36 WF-0000201-0000203
DB-10				20220415 1337 Email Gabauer Ex. 14 SCB-001829-001835
DB-11				20220422 Wells Fargo Waiver Grossman Ex. 37 WF-0000204-0000207
DB-12				20220501 Weekly Labor Cost Reduction Evans Ex. 8
DB-13				20220508 2310 Email Belford Ex. 59 SCB-005334
DB-14				20220527 2311 Email Gabauer Ex. 17 SCB-005316-005321
DB-15				20220602 1315 Email Gabauer Ex. 8 SCB-001722-001725
DB-16				20220602 Evans Employment Agreement Gabauer Ex. 9 SCB-005283-005285
DB-17				20220603 Barr Employment Agreement
DB-18				20220605 1804 Belford Email SCB-000457
DB-19				20220605 2144 Email Gabauer Ex. 27 SCB-001732-001737
DB-20				20220607 2042 Evans Email SCB-005240
DB-21				20220608 1249 Email Belford Ex. 28 SCB-005213-005215
DB-22				20220608 1718 Evans Email SCB-001757-001759
DB-23				20220610 1916 Email Gabauer Ex. 29 SCB-000386-000391
DB-24				20220610 Evans Emails SCB-000384, 000457-000462
DB-25				20220613 1232 Email Gabauer Ex. 5 SCB-002888-002889
DB-26				20220615 1224 Email Belford Ex. 22 SCB-003545
DB-27				20220615 1409 Email Gabauer Ex. 21 SCB-002890
DB-28				20220620 2256 Inventive Email
DB-29				20220623 1013 Email Barr Ex. 11
DB-30				20220627 0104 Supplier Email
DB-31				20220627 0212 Email Gabauer Ex. 23 SCB-000171
DB-32				20220627 1231 Email Barr Ex. 22
DB-33				20220627 1618 Email Belford Ex. 61 SCB-006061
DB-34				20220627 Pacitti Letter to Payne Barr Ex. 21
DB-35				20220629 1408 Email Gabauer Ex. 15 SCB-001558-001559
DB-36				20220630 Delayed Draw Term Loan Note Evans Ex. 5 SCB-001447-001448
DB-37				20220630 Loan and Security Agreement Evans Ex. 4

				SCB-001428-001446
DB-38				20220630 Marshall Letter to Payne Barr Ex. 23
DB-39				20220630 Subordinated Debt Loan Approval SCB-000005-000008 Gabauer Ex. 4
DB-40				20220630 Wells Fargo Notice of Defaults and Reservation of Rights Grossman Ex. 38 WF-0000806-0000808
DB-41				20220701 Intercreditor Subordination Agreement Evans Ex. 6 SCB-001452-001457
DB-42				20220713 1148 Email Belford Ex. 69 SCB-001156-001157, 005525
DB-43				20220714 0650 Belford Email SCB-005229-005532
DB-44				20220714 0657 Email Belford Ex. 70 SCB-000410-000411, 001193
DB-45				20220714 Evans Emails ECF No. 134-9
DB-46				20220718 1202 Email Gabauer Ex. 11 SCB-005495
DB-47				20220720 0222 Email Belford Ex. 25 SCB-005490-005491
DB-48				20220722 1332 Email Grossman Ex. 41 WF-0000637-000642
DB-49				20220826 A. Payne Letter SCB-000037
DB-50				20220907 Written Consent of Sole Voting Shareholder of UFI SCB-000013
DB-51				20220912 0111 Email Barr Ex. 12
DB-52				20220915 Wells Fargo Notice of Defaults and Reservation of Rights Grossman Ex. 42 SCB-0000472-0000474
DB-53				20220919 1236 Evans Email SCB-004185
DB-54				20221004 2033 Email Belford Ex. 43 SCB-002465-002467
DB-55				20221013 1647 Evans Email SCB-005681
DB-56				20221020 1802 401K Email
DB-57				20221024 1720 Email Grossman Ex. 44 WF-0000412
DB-58				20221025 1444 Email Grossman Ex. 45 WF-0000580-0000586
DB-59				20221026 1745 Email Belford Ex. 46 WF-0000854-0000856
DB-60				20221027 1659 Barr Email SCB-003962-003963
DB-61				20221030 1843 Email Belford Ex. 72 SCB-005668-005669
DB-62				20221101 1548 Email Grossman Ex. 47 WF-0000853
DB-63				20221102 0023 Email Gabauer Ex. 20 SCB-001158-001160
DB-64				20221104 1230 Email Grossman Ex. 48 WF-0000403
DB-65				20221111 2211 Evans Email SCB-003913

DB-66				20221114 1704 Email Grossman Ex. 49 WF-0000874
DB-67				20221115 2327 Email Barr Ex. 4
DB-68				20221120 1727 Email Barr Ex. 6
DB-69				20221120 1947 Email Barr Ex. 5
DB-70				20221121 0029 Email Barr Ex. 7
DB-71				20221121 0147 Email Barr Ex. 8
DB-72				20221121 1204 Barr Email re Confidential
DB-73				20221121 1304 Barr Email re Confidential
DB-74				20221121 1317 Email Barr Ex. 9
DB-75				20221121 1328 Email Grossman Ex. 54 WF-0000873
DB-76				20221121 1651 Barr Email re Warn Act
DB-77				20221121 1727 Pacitti Email Barr Ex. 27
DB-78				20221121 2214 Text Message P0001-0002
DB-79				20221121 2215 L. Barr Email SCB-000428-000429
DB-80				20221121 2249 Email with Notes
DB-81				20221121 2342 Email with Notes
DB-82				20221121 Email-Text Message NEAL-389
DB-83				20221121 Employee Index UFI787
DB-84				20221121 Messages to Employees P0001-0002
DB-85				20221121 Second Letter to Former Employees
DB-86				20221121 Separation and WARN Notice - Cheryl Christian UFI 5511
DB-87				20221121 WARN Notice to Michael Ackard Barr Ex. 30 UFI 5144
DB-88				20221121 WARN Notices UFI 5139, 5151
DB-89				20221121 Written Action of the Board of Directors SCB-006224-006225
DB-90				20221122 0259 Gabauer Email SCB-006226-006227
DB-91				20221122 0513 Gabauer Email SCB-006222-006225
DB-92				20221122 2009 WARN Email SCB-003782-003784
DB-93				20221122 Board Resolution SCB-006222-006225
DB-94				20221123 1732 Email Evans Ex. 24 SCB-000061-000062
DB-95				20221123 2301 L. Barr Email SCB-000376
DB-96				20221123 Gabauer Resignation IRE0000274
DB-97				20221130 1328 Email Belford Ex. 32 WF-0000198-0000200, 0000862
DB-98				20221201 Written Action of the Board of Directors SCB-000001-000002
DB-99				20221218 1609 Email Evans Ex. 27 UFI000347-000351
DB-100				20221218 2239 Email Evans Ex. 26 UFI-000343-000346
DB-101				20221218 Evans Emails UFI000343-000344, 000347
DB-102				20240625 Neal Response to Belford Stage Capital

				Discovery
DB-103				20240716 Almarai's Response Objections to Def's Interrogatories
DB-104				20240716 Neal Supplemental Responses to Belford Discovery
DB-105				20240723 James Pugh's Responses and Objections to Defendants David A. Belford and Stage Capital, LLC's First Set of Interrogatories and Requests for Production of Documents
DB-106				20240816 Calvin Hogan Responses to Belford Discovery
DB-107				20240819 Calvin Hogan Responses to Belford Discovery
DB-108				20240905 Hogan's Supp Response to Interrogatories from Belford Neal vs UFI
DB-109				20240905 Neal Second Supp Response to Interrogatories from Belford
DB-110				20240905 Pugh's Supp Response to Interrogatories from Belford
DB-111				20241014 James Pugh's Responses to Belford's Second Set of Discovery
DB-112				20241014 Calvin Hogan's Responses to Belford's Second Set of Discovery
DB-113				20241014 Neal's Responses to Belford's Second Set of Discovery

DATED: April 8, 2025

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By: /s/ Geoffrey S. Trotier

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