

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: SHARITY MINISTRIES, INC., Debtor.	Chapter 11 Case No. 21-11001 (TMH)
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In re: THE ALIERA COMPANIES, INC. d/b/a Alieria Healthcare, Inc., <i>et al.</i> , Debtors.	Chapter 11 Case No. 21-11548 (TMH) (Jointly Administered)
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**APPELLANTS' DESIGNATION OF RECORD AND STATEMENT
OF ISSUES ON APPEAL PURSUANT TO FED. R. BANKR. P. 8009(a)**

Pursuant to Fed. R. Bankr. P. 8009(a) and Del. Bankr. L.R. 8009-1, Shelley Steele, Tim Moses, and Chase Moses (“Appellants”), hereby submit their designation of the record and statement of issues on appeal in connection with their appeal from the *Opinion and Order* [Case No. 21-11001 (TMH), Docket No. 595; Case No. 21-11548 (TMH) Docket No. 711], entered on July 24, 2025, granting in part and denying in part *Motion for Declaration That Montana Individual Claims Against Steele and Tim and Chase Moses are Not Subject to Stay* [Case No. 21-11001 (TMH), Docket No. 553; Case No. 21-11548 (TMH), Docket No. 670].

DESIGNATION OF THE RECORD ON APPEAL

Appellants hereby designate the following pleadings and other documents as the record on appeal:

DOCUMENTS FROM BANKR. D. DEL. CASE NO. 21-11001 (TMH)

Item No.	Description	Docket No.	Filing Date
1	Motion for Declaration That Montana Individual Claims Against Steele and Tim and Chase Moses are Not Subject to Stay	553	1/27/25
2	Objection of Shelley Steele, Tim Moses and Case Moses to Motion for Declaration That Montana Individual Claims Against Steele and Tim and Chase Moses Are Not Subject to Stay	566	2/18/25
3	Sharity Trustee's Response to Motion for Declaration that Montana Individual Claims are not Subject to Stay	568	3/11/25
4	Amended Sharity Trustee's Response to Motion for Declaration that Montana Individual Claims Against Steele and Tim and Chase Moses Are Not Subject to Stay	569	3/12/25
5	Reply Brief in Support of Motion for Declaration that Montana Individual Claims Against Steele and Tim and Chase Moses Are Not Subject to Stay	570	3/13/25
6	Supplemental Objection of Shelley Steele, Tim Moses and Chase Moses to Motion for Declaration That Montana Individual Claims Against Steele and Tim and Chase Moses are Not Subject to Stay	580	4/23/25
7	Moellers' Supplemental Brief in Support of Motion for Declaration That Montana Individual Claims Against Steele and Tim and Chase Moses are Not Subject to Stay	581	4/23/25
8	Opinion and Order	595	7/24/25
9	Transcript of March 18, 2025	597	8/5/25
10	Hearing Notice of Appeal	598	8/5/25

DOCUMENTS FROM BANKR. D. DEL. CASE NO. 21-11548 (TMH)

Item No.	Description	Docket No.	Filing Date
11	Motion for Declaration That Montana Individual Claims Against Steele and Tim and Chase Moses are Not Subject to Stay	670	1/27/25
12	Objection of Shelley Steele, Tim Moses and Case Moses to Motion for Declaration That Montana Individual Claims Against Steele and Tim and Chase Moses Are Not Subject to Stay	686	2/17/25
13	Response of the Liquidating Trustee to Motion for Declaration that Montana Individual Claims Against Steele and Tim and Chase Moses are Not Subject to Stay	687	2/17/25
14	Sharity Trustee's Preliminary Response and Joinder in the Response of the Liquidating Trustee to Motion for Declaration that Montana Individual Claims Against Steele and Tim and Chase Moses are Not Subject to Stay	688	2/18/25
15	Reply in Support of Motion for Declaration That Montana Individual Claims Against Steele and Tim and Chase Moses are Not Subject to Stay	694	3/13/25
16	Supplemental Objection of Shelley Steele, Tim Moses and Chase Moses to Motion for Declaration That Montana Individual Claims Against Steele and Tim and Chase Moses are Not Subject to Stay	706	4/23/25
17	Moellers' Supplemental Brief in Support of Motion for Declaration That Montana Individual Claims Against Steele and Tim and Chase Moses are Not Subject to Stay	707	4/23/25
18	Opinion and Order	711	7/24/25
19	Transcript of March 18, 2025 Hearing	712	8/5/25
20	Notice of Appeal	713	8/5/25

STATEMENT OF THE ISSUES ON APPEAL

Appellants hereby state the following as the issues on appeal pursuant to Fed. R. Bankr. P. 8009(a)(1)(A):

1. Whether the Bankruptcy Court erred in finding that the breach of contract claim asserted by Ron Moeller and Maria Moeller against Appellants is an individual claim and is not an asset of the above-captioned Debtors' estates.
2. Whether the Bankruptcy Court erred in finding that the joint tortious enterprise claim asserted by Ron Moeller and Maria Moeller against Appellants is an individual claim and not encompassed within an asset of the above-captioned Debtors' estates.
3. Whether the Bankruptcy Court erred in finding that the malice claim asserted by Ron Moeller and Maria Moeller against Appellants is an individual claim and not encompassed within an asset of the above-captioned Debtors' estates.

CERTIFICATION REGARDING TRANSCRIPTS

Pursuant to Rule 8009(b)(1) of the Federal Rules of Bankruptcy Procedure, Appellants hereby certify that they are not ordering any transcripts. The relevant transcripts have been docketed in the above-captioned adversary case.

Respectfully submitted,

Dated: August 20, 2025

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