

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF KENTUCKY
LEXINGTON DIVISION**

In re	:	Case No. 25-50863
Lexington Blue, Inc.	:	Chapter 11
Debtor	:	Small business case
	:	
	:	Hon. Gregory R. Schaaf
	:	United States Bankruptcy Judge

**DEBTOR'S MOTION FOR ENTRY OF AN INTERIM AND FINAL ORDER
AUTHORIZING THE FILING OF THE CONSUMER MAILING LIST UNDER SEAL
PURSUANT TO FED. R. BANKR. P. 9037(f)**

Lexington Blue, Inc. (the "Debtor"), by and through undersigned counsel, hereby moves the Court pursuant to Rule 9037(f) of the Federal Rules of Bankruptcy Procedure and 11 U.S.C. § 107(c) for entry of an order authorizing the Debtor to file the mailing list for its consumer creditors (the "Consumer Mailing List") under seal, and in support thereof respectfully states as follows:

RELIEF REQUESTED WITHOUT NOTICE

Debtor is requesting that the relief in this Motion be given without notice or a hearing pursuant to LBR 9013-1(c)(xiii).

Respectfully,

/s/ J. Christian Dennery

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Proposed Attorney for Debtor and Debtor in Possession

MEMORANDUM

JURISDICTION AND VENUE

1. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory bases for the relief requested is 11 U.S.C. § 107(c)(1), and Bankruptcy Rule 9037(a); and LBR 9013-1(c)(xiii).

BASIS FOR RELIEF

2. Debtor filed for relief under chapter 11 of the bankruptcy code on June 16, 2025. (the “Petition Date”).

3. Debtor has identified 263 customers who made deposits for work not yet performed, (the “LB Customers”) under contracts for residential services, including roofing, siding and other related restorative work. (The “Customer Contracts”).

4. The LB Customers are listed: (a) as counterparties to executory contracts on Schedule G; and (b) as general unsecured creditors on Schedule F. The amount of the claims filed on behalf of the LB customers in Schedule F is equal to the deposits made by each LB Customer (“Customer Claims”). Customer Claims were not listed as disputed, contingent, or unliquidated, specifically so that LB Customers will not be required to file a proof of claim.

5. Debtor knows the physical address to the property to be serviced under each Consumer Contract. Debtor also knows the phone number for each LB Customer. Debtor also has an email address for 31 of the 263 LB Customers. The (“Consumer Mailing List”).

6. Bankruptcy Rule 9037(a) requires redaction of certain personal data identifiers from filings. Subsection (f) permits the Court to authorize filings under seal “for cause,” where the redaction requirements under Rule 9037(a) are insufficient or impractical. In such cases, the rule

authorizes the filing of a reference list that specifies an appropriate identifier that uniquely corresponds to each consumer listed.

7. In addition, 11 U.S.C. § 107(c)(1) authorizes the Court to protect individuals from undue risk of identity theft or other unlawful injury by restricting public access to information containing “means of identification” or other sensitive personal data.

8. The Debtor seeks entry of an order permitting it to file under seal the mailing addresses of the 263 LB Customers. In lieu of a creditor matrix, Debtor seeks the entry of an order permitting it to file a reference list in lieu of a redacted list of consumer creditors. A copy of the reference list is attached hereto as Exhibit 1.

9. The Debtor submits that cause exists under Bankruptcy Rule 9037(f) to grant the requested relief. As detailed in the Debtor’s concurrently filed Motion to Establish Notice Procedures and Master Mailing List, the Debtor has already taken substantial steps to safeguard customer privacy and to manage notice efficiently in this Chapter 11 case. Specifically:

- (a) The Debtor has built a secure case website and password-protected subdomain landing pages dedicated to notifying LB Customers of matters that affect their interests.
- (b) LB Customers with email addresses are notified electronically and prompted to confirm or update their contact information via a secure form.
- (c) Any party seeking access to sensitive customer data - including potential bidders - must execute a non-disclosure and non-solicitation agreement before gaining access to the full customer files.

10. Redaction of the mailing list is impractical due to the size and nature of the list, which contains names and home addresses of individuals who are not sophisticated commercial creditors but ordinary consumers whose privacy must be respected.

11. Filing the Consumer Mailing List under seal will not impair notice or prejudice the rights of any creditor. The Debtor has already demonstrated its commitment to effective, secure, and compliant service of process through its comprehensive notice strategy.

12. Absent sealing, public disclosure of the Consumer Mailing List risks causing unnecessary distress, privacy invasions, and possible exposure to solicitations or identity misuse.

WHEREFORE, the Debtor respectfully requests that the Court enter an order:

- (a) authorizing the Debtor to file the Consumer Mailing List under seal pursuant to Fed. R. Bankr. P. 9037(f) and 11 U.S.C. § 107(c);
- (b) directing that the unredacted Consumer Mailing List shall not be made available to the public but may be made available to the U.S. Trustee, the Court, and any other party upon further order of the Court or upon execution of a protective order or NDA; and
- (c) granting such other and further relief as is just and proper

Respectfully,

/s/ J. Christian Dennery

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Proposed Attorney for Debtor and Debtor in Possession

CERTIFICATE OF SERVICE

I certify that the foregoing document was served on all persons registered to receive electronic notices through the Court's ECF system on June 17, 2025.

/s/ J. Christian Dennery

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF KENTUCKY
LEXINGTON DIVISION**

In re	:	Case No. 25-50836
Lexington Blue, Inc.	:	Chapter 11
Debtor	:	Small business case
	:	
	:	Hon. Gregory Schaaf
	:	United States Bankruptcy Judge

**INTERIM ORDER GRANTING MOTION TO FILE CONSUMER MAILING LIST
UNDER SEAL**

This matter having come before the Court on the Motion of the Debtor for the Entry of an Order Authorizing the Filing of the Consumer Mailing List Under Seal Pursuant to Fed. R. Bankr. P. 9037(f) (the “Motion”); the Court having reviewed the Motion, and having determined that good and sufficient cause exists to grant the requested relief under Bankruptcy Rule 9037(f) and 11 U.S.C. § 107(c); it appearing that the relief requested is in the best interest of the Debtor, the consumer creditors, and the estate; and the Court being otherwise sufficiently advised, IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED on an interim basis.
2. The Debtor is authorized to file the unredacted Consumer Mailing List under seal.
3. The Debtor is authorized to utilize the reference list attached hereto Exhibit A in lieu of a redacted Consumer Mailing List for the duration of this case.
4. The sealed Consumer Mailing List shall not be made available to the public, but may be disclosed to:
 - (a) the United States Trustee;
 - (b) the Court and its personnel; and

(c) any other party in interest upon further order of the Court or upon execution of an appropriate protective order or non-disclosure agreement, in form and substance acceptable to the Debtor.

5. The requirements of Bankruptcy Rule 9037(a) are deemed satisfied based on the sealing of the Consumer Mailing List, and the protections of 11 U.S.C. § 107(c) shall apply.

6. Parties in interest shall have 14 days from the date of this Order to file objections to Debtor's motion and notice their objections for a hearing before this Court; If no objection is filed, this Order shall become final 14 days from the date of this Order.

7. Debtor in Possession shall, within seven (7) days of the entry of this order, serve a copy of the order on the creditors described in FRBP 1007(d), all secured creditors, and the U.S. Trustee, in accordance with the bankruptcy rules or any related orders that are entered in this case.

SO ORDERED,

EXHIBIT A
9037(f) - Reference List for Redacted Items

Unique ID	Name	Street Address	City	State	Zip
41:Tirr			Louisville	KY	40216
24-5475:Boso			Lexington	KY	40515
024-167:Chay			Covington	KY	41011
024-191:Joth			Lebanon	OH	45036
81:Shst			Washington	KY	40047
87:Jile			Washington	KY	40047
89:Clin			Prospect	KY	40059
91:Jers			Prospect	KY	40059
88:Cras			Louisville	KY	40118
62:Hoer			Shepherdsville	KY	40165
51:Trtt			Louisville	KY	40206
90:Wert			Louisville	KY	40206
84:Brrs			Louisville	KY	40207
19:Kell			Louisville	KY	40210
29:Jais			Louisville	KY	40210
54:Arey			Louisville	KY	40211
21:Phwe			Louisville	KY	40212
40:Dons			Louisville	KY	40212
47:Phnd			Louisville	KY	40212
73:War.			Louisville	KY	40212
35:Taps			Louisville	KY	40213
55:Glrs			Louisville	KY	40213
44:Jott			Louisville	KY	40214
45:Larf			Louisville	KY	40214
60:Daur			Louisville	KY	40214
67:Krez			Louisville	KY	40214
52:Wace			Louisville	KY	40215
26:Fiez			Louisville	KY	40216
53:Abes			Louisville	KY	40216
57:Caig			Louisville	KY	40216
78:Kaph			Louisville	KY	40216
50:Brsh			Louisville	KY	40218
64:Saoi			Louisville	KY	40218
68:Juez			Louisville	KY	40218
70:Hang			Louisville	KY	40218
65:They			Louisville	KY	40219
92:Mael			Louisville	KY	40219
10:Dals			Louisville	KY	40220
42:Maer			Louisville	KY	40220
59:Ryar			Louisville	KY	40220
63:vion			Louisville	KY	40220
69:Gete			Louisville	KY	40220

EXHIBIT A
9037(f) - Reference List for Redacted Items

74:Chon			Louisville	KY	40220
75:Loby			Louisville	KY	40220
38:Grey			Louisville	KY	40223
77:Keyo			Louisville	KY	40229
83:Teon			Louisville	KY	40229
56:Rott			Louisville	KY	40242
61:Wird			Louisville	KY	40242
58:Matt			Louisville	KY	40245
22:Rill			Louisville	KY	40258
23:Rion			Louisville	KY	40258
30:Nesh			Louisville	KY	40258
32:Doth			Louisville	KY	40258
33:Anry			Louisville	KY	40258
34:Joer			Louisville	KY	40258
36:Jaon			Louisville	KY	40258
37:Mien			Louisville	KY	40258
46:Shey			Louisville	KY	40258
82:Jais			Louisville	KY	40258
28:Jein			Louisville	KY	40272
31:Coal			Louisville	KY	40272
20:Kird			Louisville	KY	40291
85:Juoz			Louisville	KY	40291
80:Nais			fersontown	KY	40299
16-4811:Teth			Georgetown	KY	40324
24-5245:Joey			Georgetown	KY	40324
24-5266:Malg			Georgetown	KY	40324
24-5399:Loer			Georgetown	KY	40324
24-5448:Zaer			Georgetown	KY	40324
24-5465:Scon			Georgetown	KY	40324
24-5469:Anry			Georgetown	KY	40324
24-5467:Sher			Harrodsburg	KY	40330
16-4880:Sais			Lawrenceburg	KY	40342
24-5503:Jong			Lawrenceburg	KY	40342
24-5525:Aron			Lawrenceburg	KY	40342
23-5014:Nott			Mount Sterling	KY	40353
24-5516:Mall			Mount Sterling	KY	40353
23-5131:Daer			Nicholasville	KY	40356
23-5146:Bots			Nicholasville	KY	40356
24-5285:Bong			Nicholasville	KY	40356
24-5351:Wars			Nicholasville	KY	40356
24-5402:Keid			Nicholasville	KY	40356
24-5443:Nord			Nicholasville	KY	40356
24-5447:Annt			Nicholasville	KY	40356
24-5464:Kely			Nicholasville	KY	40356

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9037(f) - Reference List for Redacted Items

24-5480:Tire			Nicholasville	KY	40356
24-5483:Joor			Nicholasville	KY	40356
24-5240:Daey			Paris	KY	40361
24-5433:Gren			Paris	KY	40361
24-5481:Dars			Paris	KY	40361
24-5487:Miin			Paris	KY	40361
24-5505:Soez			Paris	KY	40361
23-5035:Scon			Versailles	KY	40383
24-5380:Lion			Versailles	KY	40383
24-5388:Rang			Versailles	KY	40383
24-5390:Land			Versailles	KY	40383
24-5451:Raff			Versailles	KY	40383
24-5460:Keel			Versailles	KY	40383
24-5486:Lost			Versailles	KY	40383
24-5502:Dett			Versailles	KY	40383
24-5518:Erey			Winchester	KY	40391
23-5123:Anon			Berea	KY	40403
23-5022:Elrd			Danville	KY	40422
24-5436:Scin			Lancaster	KY	40444
24-5521:Ster			Lancaster	KY	40444
23-4964:Lars			Richmond	KY	40475
23-4967:Vaur			Richmond	KY	40475
23-5012:Roer			Richmond	KY	40475
23-5098:Bron			Richmond	KY	40475
24-5202:Bery			Richmond	KY	40475
24-5221:Jaan			Richmond	KY	40475
24-5257:Mial			Richmond	KY	40475
24-5468:Chrd			Richmond	KY	40475
24-5477:Miey			Richmond	KY	40475
24-5336:Haon			Lexington	KY	40502
24-5356:Fren			Lexington	KY	40502
24-5360:Cair			Lexington	KY	40502
24-5442:Crll			Lexington	KY	40502
24-5457:Joay			Lexington	KY	40502
24-5470:Surd			Lexington	KY	40502
24-5509:Rams			Lexington	KY	40502
24-5529:Jutt			Lexington	KY	40502
24-5530:Tele			Lexington	KY	40502
16-4808:Adra			Lexington	KY	40503
24-5199:Jewn			Lexington	KY	40503
24-5244:Keco			Lexington	KY	40503
24-5318:Tiam			Lexington	KY	40503
24-5346:Brdy			Lexington	KY	40503
24-5387:Mael			Lexington	KY	40503

EXHIBIT A
9037(f) - Reference List for Redacted Items

24-5394:Waga			Lexington	KY	40503
24-5396:Gler			Lexington	KY	40503
24-5397:Ving			Lexington	KY	40503
24-5410:Maer			Lexington	KY	40503
24-5411:Kean			Lexington	KY	40503
24-5417:Kaon			Lexington	KY	40503
24-5420:Sary			Lexington	KY	40503
24-5427:EIJR			Lexington	KY	40503
24-5428:Peov			Lexington	KY	40503
24-5440:Dons			Lexington	KY	40503
24-5453:Mair			Lexington	KY	40503
24-5454:Dams			Lexington	KY	40503
24-5466:Anpp			Lexington	KY	40503
24-5473:schy			Lexington	KY	40503
24-5490:Rone			Lexington	KY	40503
24-5492:Door			Lexington	KY	40503
24-5510:Anls			Lexington	KY	40503
24-5513:Sues			Lexington	KY	40503
24-5526:Caer			Lexington	KY	40503
24-5528:Deey			Lexington	KY	40503
16-4777:Sand			Lexington	KY	40504
24-5272:Lill			Lexington	KY	40504
24-5401:Ales			Lexington	KY	40505
24-5474:Maez			Lexington	KY	40505
24-5517:Zans			Lexington	KY	40505
23-5097:Sher			Lexington	KY	40509
23-5171:Strd			Lexington	KY	40509
24-5368:Baer			Lexington	KY	40509
24-5369:Chch			Lexington	KY	40509
24-5382:Mars			Lexington	KY	40509
24-5416:Staj			Lexington	KY	40509
24-5435:Roer			Lexington	KY	40509
24-5463:Brer			Lexington	KY	40509
24-5523:Das)			Lexington	KY	40509
23-5083:Piga			Lexington	KY	40511
24-5228:Jend			Lexington	KY	40511
24-5371:Emye			Lexington	KY	40511
24-5414:Kews			Lexington	KY	40511
24-5441:Laan			Lexington	KY	40511
24-5446:Jeon			Lexington	KY	40511
24-5452:Brel			Lexington	KY	40511
24-5455:Jaob			Lexington	KY	40511
24-5462:Jing			Lexington	KY	40511
24-5512:Arns			Lexington	KY	40511

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23-5175:Jays			Lexington	KY	40513
24-5292:Juoe			Lexington	KY	40513
24-5317:Madu			Lexington	KY	40513
24-5384:Lion			Lexington	KY	40513
24-5412:Ciin			Lexington	KY	40513
24-5459:Rian			Lexington	KY	40513
24-5488:Viea			Lexington	KY	40513
23-5036:Lef)			Lexington	KY	40514
24-5258:Daon			Lexington	KY	40514
24-5260:Doe			Lexington	KY	40514
24-5289:Boon			Lexington	KY	40514
24-5334:Naan			Lexington	KY	40514
24-5353:Miin			Lexington	KY	40514
24-5359:Lirt			Lexington	KY	40514
24-5391:Goam			Lexington	KY	40514
24-5403:Lier			Lexington	KY	40514
24-5405:Suas			Lexington	KY	40514
24-5407:Gatz			Lexington	KY	40514
24-5413:Brer			Lexington	KY	40514
24-5415:Crth			Lexington	KY	40514
24-5422:Loon			Lexington	KY	40514
24-5423:Doon			Lexington	KY	40514
24-5424:Jofe			Lexington	KY	40514
24-5426:Virt			Lexington	KY	40514
24-5432:Hazu			Lexington	KY	40514
24-5456:Mies			Lexington	KY	40514
24-5461:Joer			Lexington	KY	40514
24-5484:Daer			Lexington	KY	40514
24-5514:Brgs			Lexington	KY	40514
23-4920:Heva			Lexington	KY	40515
23-5183:Mall			Lexington	KY	40515
24-5192:Jier			Lexington	KY	40515
24-5209:Fesm			Lexington	KY	40515
24-5248:Roes			Lexington	KY	40515
24-5262:Kens			Lexington	KY	40515
24-5297:Saez			Lexington	KY	40515
24-5329:joch			Lexington	KY	40515
24-5345:Joan			Lexington	KY	40515
24-5355:Join			Lexington	KY	40515
24-5361:Keys			Lexington	KY	40515
24-5362:Lion			Lexington	KY	40515
24-5363:Anli			Lexington	KY	40515
24-5434:Brgh			Lexington	KY	40515
24-5479:Cais			Lexington	KY	40515

EXHIBIT A
9037(f) - Reference List for Redacted Items

24-5501:Maaa			Lexington	KY	40515
24-5504:Saon			Lexington	KY	40515
24-5507:Tird			Lexington	KY	40515
24-5527:Roas			Lexington	KY	40515
24-5444:Nkla			Lexington	KY	40516
23-5187:Rops			Lexington	KY	40517
24-5213:Kaer			Lexington	KY	40517
24-5323:Grer			Lexington	KY	40517
24-5392:Sual			Lexington	KY	40517
24-5408:Tid)			Lexington	KY	40517
24-5409:Auke			Lexington	KY	40517
24-5472:Jung			Lexington	KY	40517
24-5478:Lars			Lexington	KY	40517
24-5489:Wiil			Lexington	KY	40517
24-5519:Beon			Lexington	KY	40517
24-5522:Jogg			Lexington	KY	40517
24-5531:Shar			Lexington	KY	40517
24-5425:Brey			Frankfort	KY	40601
24-5449:Grey			Frankfort	KY	40601
24-5476:Runs			Frankfort	KY	40601
24-5493:Sath			Frankfort	KY	40601
24-5511:Miez			Frankfort	KY	40601
24-5515:Roon			Frankfort	KY	40601
24-5524:chck			Frankfort	KY	40601
24-5520:Aner			Corinth	KY	41010
024-165:Rans			Ft Wright	KY	41011
024-190:Jous			Erlanger	KY	41018
024-187:Wals			Florence	KY	41042
024-175:Male			Independence	KY	41051
024-189:Joen			Union	KY	41091
024-185:Daey			Cleves	OH	45002
024-188:Fren			Lebanon	OH	45036
024-156:Miee			Monroe	OH	45050
024-184:Frel			Trenton	OH	45067
024-198:Brtt			Hamersville	OH	45130
024-176:Raet			Cincinnati	OH	45216
024-186:Jong			Cincinnati	OH	45231
024-197:Leor			Cincinnati	OH	45231
024-159:Cach			Cincinnati	OH	45237
024-196:Lion			Golf Manor	OH	45237
024-157:Maon			Cincinnati	OH	45240
024-177:Rean			Cincinnati	OH	45240
024-181:Ante			Cincinnati	OH	45240
024-102:Heng			Dayton	OH	45431