

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF KENTUCKY  
*Electronically Filed*

IN RE:	)	
	)	
Lexington Blue, Inc.	)	CASE NO.: 25-50863
	)	Chapter 11
Debtor	)	
_____	)	

**MOTION FOR EXAMINATION OF LEXINGTON INSURANCE AGENCY, INC.  
PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2004**

Sean A. McCarty, of the law firm of SATTERLEY & KELLEY, PLLC, acting as counsel on behalf of Adam Cecil and Yanett Cecil, individually and on behalf of all others similarly situated, creditors, moves for entry of an order requiring Lexington Insurance Agency, Inc. to produce documentation, and in support states:

**I. Notice and Opportunity to Object**

Please take notice that unless a party in interest files an objection to this Motion within three days from the date of this Motion, the Court may enter an Order granting the relief sought in this Motion without further hearing. *See* LR 2004-1.

**II. Motion**

1. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§157 and 1334. Venue is proper pursuant to 28 U.S.C. §1409. This matter is a core proceeding.
2. Counsel for Adam and Yanette Cecil have standing to bring this Motion pursuant to Fed. R. Bankr. P. 2004.
3. This case was filed under Chapter 11 of the United States Bankruptcy Code on June 16, 2025. The Debtor remains in possession.
4. Counsel for Adam Cecil and Yanett Cecil, seek to examine documents possessed by Lexington Insurance Agency, Inc. regarding the possible existence of bonding or other

coverage for their claims, and a proposed class of similarly situated individuals in *Adam Cecil, et. al. v. Lexington Blue, Inc., et. al.*, 25-CI-3301 (Jefferson Circuit Court).

5. All requests in this Motion relate to Lexington Blue, Inc.
6. In connection with the examination of Lexington Insurance Agency, Inc., the undersigned counsel requests the authority to issue a subpoena demanding Lexington Insurance Agency, Inc. produce the following documents in its possession, custody, or control:
  - a. All documents relating to bonding and/or insurance coverage and payment of said coverage of Lexington Blue, Inc. including, but not limited to, applications for payment, payments on the policy from any source, notices regarding the policy, etc. with policy periods from May 1, 2020 to the present;
  - b. All communications between your company and Lexington Blue, Inc. concerning bonding and/or insurance coverage with policy periods from January 1, 2020 to the present including, but not limited to, applications, approval, and payment, whether in email, written email, recordings, notes, or any other form; and
  - c. A list of all individuals who have dealt with any bond and/or policy of insurance for Lexington Blue, Inc. with a policy period from May 1, 2020 to the present and a description of their role regarding this coverage.

WHEREFORE, the undersigned counsel respectfully requests that the Court enter an Order directing Lexington Insurance Agency to produce and submit to the examination of these documents pursuant to Fed. R. Bankr. P. 2004 at the offices of Satterley & Kelley, PLLC, 8700 Westport Road, Louisville, Kentucky 40242, and authorizing the undersigned counsel to compel production of the documents described herein.

Respectfully Submitted,

/s/Sean A. McCarty  
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Paul J. Ivie, Esq.  
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***Counsel for Creditors Adam Cecil and Yanett Cecil***

**CERTIFICATE OF SERVICE**

It is hereby certified that a true and accurate copy of the foregoing document was this **18<sup>th</sup>** day of **August, 2025**, electronically filed with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants.

/s/Sean A. McCarty  
Sean A. McCarty

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Lexington Blue, Inc.	)	CASE NO.: 25-50863
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_____	)	

**ORDER AUTHORIZING EXAMINATION OF LEXINGTON INSURANCE AGENCY,  
INC. PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2004**

Upon consideration of the motion of counsel for creditors Adam Cecil and Yanett Cecil for an order authorizing the examination of Lexington Insurance Agency, Inc. pursuant to Fed. R. Bank. P. 2004, and it appearing that cause exists for the examination, it is hereby

ORDERED that Lexington Insurance Agency, Inc. shall submit to examination at a reasonable time, place, and manner specified by counsel for Debtors Adam Cecil and Yanett Cecil on prior written notice, and it is further

ORDERED that Lexington Insurance Agency, Inc. shall designate an individual competent to testify regarding the contents of the documents to be produced as set forth below, and it is further

ORDERED that counsel for Creditors Adam Cecil and Yanett Cecil are authorized to issue a subpoena to Lexington Insurance Agency, Inc. compelling production of the following documents prior to the examination:

- a. All documents relating to bonding and/or insurance coverage and payment of said coverage of Lexington Blue, Inc. including, but not limited to, applications for payment, payments on the policy from any source, notices regarding the policy, etc. with policy periods from May 1, 2020 to the present;
- b. All communications between your company and Lexington Blue, Inc. concerning bonding and/or insurance coverage with policy periods from January 1, 2020 to the present including, but not limited to, applications, approval, and payment, whether

in email, written email, recordings, notes, or any other form; and

- c. A list of all individuals who have dealt with any bond and/or policy of insurance for Lexington Blue, Inc. with a policy period from May 1, 2020 to the present and a description of their role regarding this coverage.