

**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

**DECLARATION OF BRAD PAGEL IN SUPPORT OF MOTION TO SEAL CREDITOR
MATRIX AND TO ESTABLISH NOTICE PROCEDURES**

I, Brad Pagel, under penalty of perjury hereby declares:

1. I am the 100% owner and chief executive officer of Lexington Blue, Inc., the debtor and debtor in possession in the above captioned proceedings (“LB” or “the company”). I am duly authorized to submit this Declaration.
2. I submit this Declaration in support of LB’s motions to file the consumer mailing list under seal and to establish various notice procedures in this case.
3. All facts set forth in this Declaration are based on my personal knowledge, upon information supplied to me by others, upon my review of relevant documents, or in my opinion based upon my experience in the roofing and restoration industry and my knowledge of the company’s operations and financial condition.
4. I reserve the right to amend the statements made in this declaration if I become aware of additional facts that would make any of the statements made herein inaccurate.

Background.

5. I am the founder and CEO of Lexington Blue, Inc. (“LB” or “the company”). I founded the company in 2015 and have led it for the past ten years as it grew to serve thousands of residential roofing and restoration customers across Kentucky.
6. As of late April 2025, the company ceased operations and no longer has staff, funds, or access to its full administrative infrastructure. Nonetheless, our focus remains on mitigating

disruption and minimizing harm to the residential customers who had active contracts when the company closed.

7. As part of this Chapter 11 case, LB seeks: (a) to ensure every customer who may be affected by the case is properly informed the (“LB Customers”); (b) to minimize administrative costs that would otherwise reduce or preclude any recovery available to LB Customers; and (c) to protect the LB Customers’ privacy by handling their information responsibly and securely.

8. LB has developed a dedicated website, password-protected landing pages, and a cloud-based data room to manage communications and access to relevant documents. These tools will allow LB to reduce the cost of postage while ensuring timely delivery of important information about the case.

9. To protect customer privacy, any sensitive or personally identifiable information will be redacted from public filings. Only approved third parties, such as potential bidders for customer contract assignments, will be allowed to review unredacted contract-related materials, and only after signing a confidentiality and non-solicitation agreement.

10. The proposed procedures will allow customers to update their information, monitor key developments in the case that affect their interests, and participate in the process without needing to hire a lawyer or wade through court dockets. In my view, this approach will minimize customer confusion and help prevent further harm.

11. The company has also created a list of LB Customers with incomplete jobs as of the petition date (the “Matrix”). That list was developed using data exported from our internal software systems and organized for use in this Chapter 11 proceeding. The Matrix is being used to generate mailing labels, provide service, and prepare filings for the Court.

12. I believe the Matrix represents a meaningful asset in this case. It is central to the Debtor’s plan to solicit qualified contractors to assume and complete the open jobs. If the list were made public, it would allow third parties to bypass the Court’s process and directly solicit LB Customers, disrupting the RFQ process and potentially discouraging bidders from participating.

13. I am also concerned that customers on the list could receive unsolicited marketing or service offers from roofing and restoration contractors unaffiliated with the bankruptcy case.

This would likely result in confusion and could impair the company's ability to ethically and efficiently complete job transfers for the benefit of the LB Customers and the estate.

14. Based on my experience in this industry, these notice procedures are the most effective and respectful way to mitigate the losses to the LB Customers. They balance fairness, cost-efficiency, and privacy, and they support the larger goal of preserving value for all parties involved.

15. For these reasons, the company is requesting that the Court approve both the proposed notice procedures and the sealing of the Matrix.

16. Otherwise, I have been made aware that the company has to close all existing bank accounts and open new DIP accounts. There have been no transactions made through the company's current bank accounts since the shuttering of the business.

17. However, I need at least 14 days to retrieve bank statements, and find a bank that will open a DIP account for Lexington Blue Inc.

18. I declare under penalty of perjury that the foregoing is true and correct.

FURTHER THE DECLARANT SAYETH NAUGHT

Executed under penalty of perjury


Brad Pagel (Jun 25, 2025 07:54 CDT)

Brad Pagel
LEXINGTON BLUE, INC.
Corporate Representative
DATED: Jun 25, 2025