William and Sarah Cecil

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JUN 25 2025

June 20, 2025

CLERK, U.S. BANKRUPTCY COURT EASTERN DISTRICT OF KENTUCKY

Clerk of Court

United States Bankruptcy Court Eastern District of Kentucky – Lexington Division 100 East Vine Street, Suite 200 Lexington, KY 40507

Re: Objection to Chapter 11 Bankruptcy Filing by Brad Pagel / Lexington Blue, LLC Case Number: 25-50863

Dear Honorable Judge,

We, William and Sarah Cecil, respectfully submit this letter to formally object to the Chapter 11 bankruptcy petition filed by Brad Pagel and/or Lexington Blue, LLC.

In December 2024, we entered into a contract with Lexington Blue for the replacement of our roof. As part of this agreement, we paid a \$4,287.96 deposit in good faith. Despite this payment, Lexington Blue failed to uphold its contractual obligations. The work was never commenced or completed, and repeated attempts to communicate with both Brad Pagel and the company went unanswered.

It is our belief that Mr. Pagel and Lexington Blue acted under false pretenses with no genuine intention of performing the contracted work. The collection of our deposit without any service rendered or meaningful communication constitutes not only a breach of contract but also fraudulent behavior. We understand that we are not the only victims of such actions by Mr. Pagel and Lexington Blue, further indicating a pattern of misconduct.

We therefore object to the motion for Chapter 11 bankruptcy protection, as we believe this filing is being used as a shield to avoid accountability for deliberate and deceptive practices. Allowing this bankruptcy to proceed without scrutiny would unfairly disadvantage victims like us and permit the continuation of fraudulent behavior.

We respectfully request that the Court investigate this matter thoroughly and deny the motion unless full restitution is made to creditors and victims of fraud.

Thank you for your time and consideration.

William Cecil

Sarah Cecil