

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF KENTUCKY
Lexington Division

In re:

Lexington Blue, Inc.,

Debtor.

Case No. 25-50863
Chapter 11

**Motion for Examination of JP Morgan Chase Bank, N.A. Pursuant to
Federal Rule of Bankruptcy Procedure 2004**

Paul A. Randolph, Acting United States Trustee, moves for entry of an order requiring JP Morgan Chase Bank, N.A. to appear for examination and produce documentation, and in support states:

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.

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. The United States Trustee has standing to bring this Motion pursuant to 11 U.S.C. §§ 307 and Fed. R. Bankr. P. 2004.

3. This case was filed under chapter 11 of the United States Bankruptcy Code on June 16, 2025.

4. The United States Trustee desires to examine JP Morgan Chase Bank, N.A. regarding bank statements in its possession or control related to Lexington Blue, Inc., and other related entities.

5. All requests in this Motion relate to the following entities, collectively referred to as the “Lexington Blue Entities:”

- a. Lexington Blue, Inc.
- b. Lexington Blue Lexington, LLC.
- c. Lexington Blue Louisville, LLC.
- d. Lexington Blue Cincinnati, LLC.
- e. Lexington Blue University, LLC.
- f. Lexington Blue University, Inc.
- g. Lean Dad Development, LLC.
- h. Wide Awake Consulting, LLC.
- i. The Groundzkeeper, LLC.

6. In connection with an examination of JP Morgan Chase Bank, N.A., the United States Trustee requests the authority to issue a subpoena demanding production of the following documents in the possession, custody, or control of JP Morgan Chase Bank, N.A.:

a. All statements and canceled checks from all bank and investment accounts used by any of the Lexington Blue Entities, however titled, or in which any of the Lexington Blue Entities have signatory authority, from July 1, 2022 to June 27, 2025.

b. All signature cards maintained by JP Morgan Chase Bank, N.A. for any of the Lexington Blue Entities.

WHEREFORE, the United States Trustee respectfully requests that the Court enter an Order directing JP Morgan Chase Bank, N.A. to submit to examination pursuant to Fed. R. Bankr. P. 2004 at a reasonable time and place agreed upon by the parties, and authorizing the United States Trustee to compel production of the documents described herein.

Dated: June 27, 2025

Paul A. Randolph
Acting United States Trustee

By: /s/ Bradley M. Nerderman
Tim Ruppel
Assistant U.S. Trustee
Bradley M. Nerderman
Trial Attorney
Office of the U.S. Trustee
100 E. Vine St., Suite 500
Lexington, KY 40507
(859) 233-2822

Certificate of Service

I certify that on June 27, 2025, I served a copy of the foregoing (1) via ECF noticing upon all parties registered to receive notice electronically, and (2) via first class mail, postage prepaid, upon JP Morgan Chase Bank, N.A. at Mail Code: LA4-7200, 700 Kansas Lane, Monroe, LA 71203-4774 and JP Morgan Chase Bank, N.A. at 306 W. Main Street, Suite 512, Frankfort KY 40601.

/s/ Bradley M. Nerderman
Bradley M. Nerderman

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF KENTUCKY
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In re:

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Debtor.

Case No. 25-50863
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**Order Authorizing Examination of JP Morgan Chase Bank, N.A.
Pursuant to Federal Rule of Bankruptcy Procedure 2004**

Upon consideration of the motion of the United States Trustee for an order authorizing the examination of JP Morgan Chase Bank, N.A. pursuant to Fed. R. Bankr. P. 2004, and it appearing that cause exists for the examination, it is hereby

ORDERED that JP Morgan Chase Bank, N.A. shall submit to examination at a reasonable time, place, and manner specified by the United States on prior written notice, and it is further

ORDERED that JP Morgan Chase Bank, N.A. 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 for purposes of this Order, the Lexington Blue Entities are defined as including the following:

- a. Lexington Blue, Inc.
- b. Lexington Blue Lexington, LLC.

- c. Lexington Blue Louisville, LLC.
- d. Lexington Blue Cincinnati, LLC.
- e. Lexington Blue University, LLC.
- f. Lexington Blue University, Inc.
- g. Lean Dad Development, LLC.
- h. Wide Awake Consulting, LLC.
- i. The Groundzkeeper, LLC, and it is further

ORDERED that the United States Trustee is authorized to issue a subpoena to JP Morgan Chase Bank, N.A. compelling production of the following documents prior to the scheduled examination:

- a. All statements and canceled checks from all bank and investment accounts used by any of the Lexington Blue Entities, however titled, or in which any of the Lexington Blue Entities have signatory authority, from July 1, 2022 to June 27, 2025.
- b. All signature cards maintained by JP Morgan Chase Bank, N.A. for any of the Lexington Blue Entities.