

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

In re: Lexington Blue, Inc.
Debtor

Case No. 25-50863
Chapter 11 – Small Business Case
Hon. Gregory R. Schaaf
United States Bankruptcy Judge

**MOTION FOR EXAMINATION OF JP MORGAN CHASE BANK
PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2004**

Lexington Blue, Inc. (“Debtor,” “Debtor in Possession,” or “LB”), by and through counsel, moves for entry of an order requiring JP Morgan Chase Bank NA (“Chase Bank”) to produce documentation, and in support states:

NOTICE AND OPPORTUNITY TO OBJECT

Please take notice that unless an objection to this Motion is filed within three days from the date of this Motion, the Court may enter an Order granting the relief sought in this Motion without further notice or hearing. *See* KYEB L.R. 2004-1.

JURISDICTION AND VENUE

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.

BACKGROUND AND RELIEF REQUESTED

2. This case was filed under chapter 11 of the United States Bankruptcy Code on June 16, 2025. The Debtor remains in possession.
3. Debtor desires to examine the documents of Chase Bank regarding the financial affairs of Debtor, Lexington Blue, Inc.
4. In connection with the examination of Chase Bank, Debtor requests the authority to issue a subpoena demanding Chase Bank’s production of the following documents in its possession, custody, or control:
 - a. All statements, including copies of cancelled checks, in the possession of Chase Bank for any deposit account held or formerly held by Debtor for the period beginning January 1, 2021, to the present;
 - b. A list of all individuals authorized to access any deposit account held or

formerly held by Debtor with Chase Bank at any time during the period beginning January 1, 2021, to the present;

- c. Copies of signature cards for each individual authorized to access any deposit account held or formerly held by Debtor with Chase Bank at any time during the period beginning January 1, 2021, to the present; and
- d. A list of any and all individuals or entities that were issued a debit card associated with the Debtor's deposit accounts with Chase Bank at any time during the period beginning January 1, 2021, to the present.

WHEREFORE, Debtor respectfully requests that the Court enter an Order, pursuant to FED. R. BANKR. P. 2004, directing Chase Bank to: (1) produce and submit for examination the information and documents identified herein at a reasonable time and place to be agreed upon by the parties; and (2) authorizing Debtor to compel production of the documents described herein.

Dated: Monday, July 14, 2025

/s/ J. Christian Dennery

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Attorney for Debtor and Debtor in Possession

CERTIFICATE OF SERVICE

I certify that on or before the business day following the date of this motion, a copy of the foregoing was served electronically through the Court's ECF System to all parties registered to receive notices in the above captioned case, and via certified mail to the following parties:

JP Morgan Chase Bank N.A.
Attn: Officer,
1111 Polaris Parkway
Columbus, OH 43240.

JP Morgan Chase Bank N.A.
Attn: Officer
Mail Code LA4-7300
700 Kansas Lane
Monroe, LA 71203

/s/ J. Christian Dennery
J. Christian Dennery Esq.

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**ORDER AUTHORIZING MOTION FOR EXAMINATION OF
JP MORGAN CHASE BANK NA PURSUANT TO FEDERAL RULE OF
BANKRUPTCY PROCEDURE 2004**

Upon consideration of Debtor’s motion for an order authorizing the examination of JP Morgan Chase Bank NA (“Chase Bank”) pursuant to FED. R. BANKR. P. 2004, and it appearing that cause exists for the examination, it is hereby ORDERED,

1. Chase Bank shall submit to examination at a reasonable time, place, and manner specified by Debtor on prior written notice.
2. Chase Bank shall produce the following documents as set forth below and designate an individual competent to testify regarding the contents thereof:
 - a. All statements, including copies of cancelled checks, in the possession of Chase Bank for any deposit account held or formerly held by Debtor for the period beginning January 1, 2021, to the present;
 - b. A list of all individuals authorized to access any deposit account held or formerly held by Debtor with Chase Bank at any time during the period beginning January 1, 2021, to the present;
 - c. Copies of signature cards for each individual authorized to access any deposit account held or formerly held by Debtor with Chase Bank at any time during the period beginning January 1, 2021, to the present; and
 - d. A list of any and all individuals or entities that were issued a debit card associated with the Debtor’s deposit accounts with Chase Bank at any time during the period beginning January 1, 2021, to the present.

SO ORDERED,