

**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

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**MOTION FOR EXAMINATION OF CORPORATE CLIENT SERVICES LLC  
PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2004**

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Lexington Blue, Inc. (“Debtor,” “Debtor in Possession,” or “LB”), by and through counsel, moves for entry of an order requiring Corporate Client Services LLC (“CCS”) 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 CCS regarding the financial affairs of Debtor.
4. In connection with the examination of CCS, Debtor requests the authority to issue a subpoena demanding CCS’s production of the following documents in its possession, custody or control:
  - (a) All agreements between Debtor and CCS signed, which shows the date the agreement was entered into and electronic time stamps for any electronic documents, and which were entered into during the period beginning January 1, 2021, to the present;
  - (b) A detailed accounting of all funding disbursements made to Debtor by CCS during

the period beginning January 1, 2021, to the present;

- (c) A detailed accounting of all transfers or payments of money made by Debtor to CCS during the period beginning January 1, 2021, to the present;
- (d) A copy of any correspondence between CCS and Debtor during the period beginning January 1, 2021, to the present;
- (e) A copy of agreements with CCS and any brokers who participated in any way in the transactions between CCS and the Debtor 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 CCS 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: 7/14/2025

Respectfully,

/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 regular first-class mail to the following parties:

Corporate Client Services LLC  
C/O John Paul Lauria, Registered Agent  
7800 Congress Avenue Suite 202  
Boca Raton, FL 33487

Respectfully,

/s/ J. Christian Dennergy

J. Christian A. Dennergy Esq. (KBA No. 95878)

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**ORDER AUTHORIZING MOTION FOR EXAMINATION OF  
CORPORATE CLIENT SERVICES LLC PURSUANT TO FEDERAL RULE OF  
BANKRUPTCY PROCEDURE 2004**

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Upon consideration of Debtor's motion for an order authorizing the examination of Corporate Client Services LLC pursuant to FED. R. BANKR. P. 2004, and it appearing that cause exists for the examination, it is hereby **ORDERED**,

1. Corporate Client Services LLC shall submit to examination at a reasonable time, place, and manner specified by Debtor on prior written notice.
2. Corporate Client Services LLC shall produce the following documents set forth below and designate an individual competent to testify regarding the contents thereof:
  - (a) All agreements between Debtor and CCS signed, which shows the date the agreement was entered into and electronic time stamps for any electronic documents, and which were entered into during the period beginning January 1, 2021, to the present;
  - (b) A detailed accounting of all funding disbursements made to Debtor by CCS during the period beginning January 1, 2021, to the present;
  - (c) A detailed accounting of all transfers or payments of money made by Debtor to CCS during the period beginning January 1, 2021, to the present;
  - (d) A copy of any correspondence between CCS and Debtor during the period beginning January 1, 2021, to the present;
  - (e) A copy of agreements with CCS and any brokers who participated in any way in the transactions between CCS and the Debtor during the period beginning January 1, 2021, to the present.

**SO ORDERED,**