

IN THE UNITED STATES BANKRUPTCY COURT
 FOR THE DISTRICT OF MARYLAND
 (Baltimore Division)

In re:	*	
THE LAW OFFICES OF	*	Case No: 20-12822-NVA
JONATHAN S. RESNICK, LLC		(Chapter 11)
THE LAW OFFICES OF	*	Case No: 20-12820-NVA
PERRY A. RESNICK, LLC		(Chapter 11)
THE LAW OFFICES OF	*	Case No: 20-14188-NVA
JONATHAN S. RESNICK, PLLC		(Chapter 11)
	*	(Jointly Administered under
Debtors		Case No: 20-12822-NVA)
	*	

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KRUNCHCASH, LLC’S MOTION TO JOIN THE CHAPTER 11 TRUSTEE’S EMERGENCY MOTION FOR ORDER (A) DESIGNATING RESPONDENTS PURSUANT TO RULE 9001(5), (B) COMPELLING DEBTORS AND THOSE ACTING FOR OR IN CONCERT WITH THEM TO TURN OVER RECORDED INFORMATION TO TRUSTEE, (C) DIRECTING AN ACCOUNTING, AND (D) ENJOINING DEBTORS AND THOSE ACTING FOR OR IN CONCERT WITH THEM FROM FURTHER VIOLATING THE AUTOMATIC STAY

Creditor KrunchCash, LLC (“KrunchCash”) moves to join the motion of Zvi Guttman (the “Trustee”), Chapter 11 trustee of The Law Offices of Jonathan S. Resnick, LLC (the “LLC Debtor”); The Law Offices of Jonathan S. Resnick, PLLC (the “PLLC Debtor”); and The Law Offices of Perry A. Resnick, LLC (the “PAR Debtor,” and together with the LLC Debtor and the PAR Debtor, the “Debtors”), in the Trustee’s Emergency Motion for an Order (a) designating respondents pursuant to Rule 9001(5), (b) compelling debtors and those acting for or in concert with them to turn over recorded information to trustee, (c) directing an accounting, and (d) enjoining debtors and those acting for or in concert with them from further violating the automatic stay (the “Motion”), and states:

Joinder

1. As detailed in the Motion, Debtors’ principals and former employees have failed to turn over to the Trustee the Debtors’ case files, business records, computers, hard drives, check registries, and general records kept in the ordinary course of business (“Property”).
2. Consistent with KrunchCash’s experience dealing with the Debtors, the Debtors have failed to comply with the Trustee’s multiple requests for the Property.

3. Perhaps most disturbing is the Trustee's allegation that users of the Debtors' email services have deleted emails in violation of Bankruptcy Code U.S.C. § 362(a)(3).

4. KrunchCash, a secured creditor over the Debtors' assets, has an interest in recovering Debtors' missing Property, especially the case files.

5. The information provided to the Court by the Trustee suggests that Debtors may have converted or otherwise destroyed Debtors' Property, assets in which KrunchCash has a secured interest.

6. To the extent the Trustee is unable to recover the Property, KrunchCash is harmed by the conduct described in the Motion.

7. For all of the foregoing reasons, KrunchCash joins and endorses the Trustee's Motion.

/s/ Catherine Keller Hopkin
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CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of May 2020, notice of filing the KrunchCash, LLC's Motion to Join the Chapter 11 Trustee's Emergency Motion for Order (A) Designating Respondents Pursuant to Rule 9001(5), (B) Compelling Debtors and Those Acting for or in Concert with Them to Turn Over Recorded Information to Trustee, (C) Directing an Accounting, and (D) Enjoining Debtors and Those Acting for or in Concert with Them from Further Violating the Automatic Stay (the "Joinder") was served by CM/ECF to those parties listed on the docket as being entitled to such electronic notices, which parties are identified on the attached service list; and a copy of the Joinder was mailed first class, postage prepaid to the parties so identified on the attached service list.

/s/ Catherine Keller Hopkin
Catherine Keller Hopkin

The following parties received a copy of the filing by first class mail:

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The following parties received CM/ECF notice of the filing:

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