

IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF MARYLAND
(BALTIMORE DIVISION)

In re:

THE LAW OFFICES OF JONATHAN S.
RESNICK, PLLC

Debtor.

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Case No. 20-14188 NVA
Chapter 11
Jointly Administered

* * * * *
In re:

THE LAW OFFICES OF JONATHAN S.
RESNICK, LLC

Debtor.

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Case No. 20-12822 NVA
Chapter 11
Jointly Administered

* * * * *
In re:

THE LAW OFFICES OF PERRY A.
RESNICK, LLC

Debtor.

*
*
*

Case No. 20-12820 NVA
Chapter 11
Jointly Administered

* * * * *

**DEBTORS' RESPONSE TO 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 Law Offices of Jonathan S. Resnick, PLLC (“JSR PLLC”), The Law The Law
Offices of Jonathan S. Resnick, LLC (“JSR LLC”) and The Law Offices of Perry A. Resnick,
PLLC (“PAR, LLC”) (collectively the “Debtors”) hereby respond to the 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 “Emergency Motion”) filed by Zvi Guttman, Chapter 11 Trustee for the Debtors (“Chapter 11 Trustee”), stating as follows:

General Response of the Debtors

1. The client files, books and records (including IOLTA account records) of JSR LLC and PAR LLC are located in the premises of the Debtors’ offices at 3665A Old Court Road, Ste. 1, Baltimore, Maryland (“Debtors’ Offices”). The locks to Debtors’ Offices have been changed and, as of the date of this Response, Debtors are being denied access to the premises. Any request to JSR LLC and PAR LLC to obtain access to the requested client files, books and records, or for an accounting of such items cannot be accommodated without access to such information. Jonathan S. Resnick, Perry A. Resnick and David Cohen are the individuals that have knowledge and information concerning the business and financial affairs of JSR LLC and PAR LLC and each have communicated their willingness, including at the present time, to cooperate with the Chapter Trustee within the limitations of information available to them.

2. JSR PLLC has no active client files, books or records (including IOLTA account records). JSR PLLC has not operated a law firm engaging in the practice of law or handled any client files since 2016. JSR PLLC filed its Chapter 11 case to address concerns that it was being operated either separately and/or as an alter ego of either JSR LLC or PAR LLC and to bring the administration of all three identified Resnick related entities before the jurisdiction of one Court. While JSR, LLC has acknowledged incorrectly using the Taxpayer Identification Number of JSR PLLC, there is no indication that JSR PLLC has operated a law firm engaging in the practice of law or handled client files utilizing the PLLC entity since 2016. Jonathan S. Resnick is the individual that has knowledge and information concerning the business and financial affairs of JSR PLLC and has communicated his willingness, including at the present time, to cooperate with the Chapter 11 Trustee within the limitations of information available to him.

Specific Responses of Debtors

3. The Chapter 11 Trustee alleges at paragraph 14 of the Emergency Motion that information concerning the Debtors' malpractice insurance has not been provided. On May 14, 2020, David Cohen forwarded the requested information to the Chapter 11 Trustee, see **Exhibit A**.

4. The Chapter 11 Trustee alleges at paragraph 15 of the Emergency Motion that property, information and records have been withheld from the Chapter 11 Trustee, identified as follows, and each of which are addressed in turn:

- a. Computers and external hard drives on which recorded information of the Debtors is stored
- b. Check registers, copies of checks, copies of invoices, tax returns and business records kept in the ordinary course of Debtors' businesses
- c. Client files and documents
- d. Any and all passwords, key codes, login information, security keys, or other similar types of information required to access and business records, documents or other information of the Debtors.

(a) Computers and External Hard Drives: JSR LLC and PAR LLC respond that there are no unaccounted for computers or external hard drives containing information of the Debtors and that all such devices remain located in the Debtors' Offices. It was represented to the Chapter 11 Trustee that Joy Wise, an employee of JSR, LLC, had possession of a lap top computer that belonged to JSR, LLC, however, such information was later determined to be incorrect.

(b) Check Registers, Copies of Checks, Copies of Invoices, Tax Returns and Business Records: All such records should be located on the premises of the Debtors' offices, for which the Debtors' do not have access. Otherwise, Jonathan S. Resnick advised the Chapter 11 Trustee that he had some copies of checks and check registers, which were

turned over to the Chapter 11 Trustee on May 19, 2020. The Chapter 11 Trustee has been advised that tax returns for the Debtors were last prepared for 2017 and that certain other requested records have not been maintained and/or simply do not exist. See the attached e-mails to the Chapter 11 Trustee dated April 28, 2020 attached as **Exhibit B**.

(c) Client files and Documents: All such records should be located on the premises of the Debtors' offices, for which the Debtors' do not have access. The Trustee was advised on April 28, 2020, that Jonathan Resnick had in his possession one banker box of client files that would be returned to the Trustee. All such client files and documents in the possession of Jonathan Resnick were turned over to the Chapter 11 Trustee on May 19, 2020.

(d) Passwords, Key Codes, Login Information, Security Keys, or Other Similar Types of Information Required to Access And Business Records, Documents or Other Information of the Debtors: Over the period of May 1 – May 4, 2020 multiple e-mails were exchanged between Debtors' Counsel, David Cohen and the Chapter 11 Trustee in response to the Chapter 11 Trustee's request for all login and password information of the Debtors. All of the Debtors' information regarding logins and passwords have been provided to the Trustee. Upon information and belief, certain of the accounts for which the Trustee seeks login and password information either do not exist or were opened by and/or are registered to KrunchCash, LLC such that the Debtors do not have this information. Further, certain accounts are likely unable to be accessed to the extent that certain charges and fees may be owing on the account, requiring payment before they may be accessed. The Debtors have again reviewed the Trustee's list of alleged missing login and password requests as referenced in at paragraph 15 of the Emergency Motion (and the e-mail request dated May 8, 2020 referenced therein) and affirm that they do not

have any additional login and password information other than what has been provided. See the attached e-mails exchanged with the Chapter 11 Trustee dated May 1 - 4, 2020 attached as **Exhibit C**.

5. The Chapter 11 Trustee further alleges in paragraph 17 of the Emergency Motion that certain e-mails of the Debtors have been deleted by the users of such accounts. The Debtors are unaware of and, therefore, deny that any e-mails have been deleted by the Debtors or their employees/users.

6. The Chapter 11 Trustee alleges in paragraph 18 of the Emergency Motion that certain login and password information provided by the Debtor did not work. The Trustee has not identified which logins and passwords he is referencing. The Debtors remain willing to assist in any way they can in this regard. David Cohen is the individual with the best knowledge of the Debtors' login and password information and confirms that he has provided the Chapter 11 Trustee with all login and password information of the Debtors within his knowledge.

7. In light of the foregoing, the Debtors assert that they have not violated the automatic stay or otherwise withheld information or property of the Debtors from the Chapter 11 Trustee. The Trustee's request to compel the Debtors to produce such information and property should therefore be denied.

8. In terms of the performance of the duties of the Debtor, including the accounting requested by the Trustee, the individuals with knowledge of Debtors' business and financial affairs for purposes of Fed.R.Bankr.P. 9001(5) are: Jonathan S. Resnick, Perry A. Resnick and David Cohen. However, the accounting that is requested by the Trustee cannot be completed by the Debtors without affording them access to the Debtors' Offices. The Debtors have and will otherwise continue to cooperate with the Chapter 11 Trustee.

WHEREFORE, in light of the foregoing, the Chapter 11 Trustee's Motion should be denied insofar as it:

(a) seeks to compel the production of information, documentation or property of the JSR LLC and PAR LLC Debtors regarding client files, books and records in question (including IOLTA account records) that are located on the premises of Debtors' Offices (to which they do not have access) to the Trustee, or seeks to compel information, documentation or property that is otherwise not in the possession, custody or control of the Debtors;

(b) seeks to compel the production of information, documentation or property of the JSR PLLC Debtor as it does not maintain, have or control any information, documents or property requested by the Chapter 11 Trustee

Respectfully submitted,

THE VERSTANDIG LAW FIRM, LLC

/s/ Maurice VerStandig
Maurice VerStandig (Fed. Bar No. 18071)
9812 Falls Road, #114-160
Potomac, Maryland 20854
Telephone: (301) 444-4600
mac@mbvesq.com

MCNAMEE, HOSEA, JERNIGAN, KIM
GREENAN & LYNCH, P.A.

/s/ Craig M. Palik
Craig M. Palik (Fed. Bar No. 15254)
6411 Ivy Lane, Suite 200
Greenbelt, Maryland 20770
Telephone: (301) 441-2420
Facsimile: (301) 982-9450
cpalik@mhlawyers.com

Attorneys for Debtors

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 20, 2020, a copy of the foregoing Response was sent via first class mail, postage prepaid to:

Gabriel Berg
KENNEDY BERG LLP
401 Broadway Suite 1900
New York, NY 10013

ECP Capital Partners, Inc.
Attn: David Cohen
12794 Hyland Circle
Boca Raton, FL 33428

I HEREBY FURTHER CERTIFY that according to the Court's CM/ECF system, the following persons received electronic service of this Motion:

- Alan M. Grochal agrochal@tydingslaw.com, fink@tydingslaw.com; jmurphy@tydingslaw.com
- Zvi Guttman zvi@zviguttman.com, zviguttman@gmail.com, zviguttman@outlook.com
- Zvi Guttman zguttman@gmail.com, zviguttman@outlook.com, MD55@ecfbis.com
- Richard J. Hackerman richard@richardhackerman.com, tlhawk18@gmail.com
- Catherine Keller Hopkin chopkin@yvslaw.com, pgomez@yvslaw.com; yvslawcmecf@gmail.com; stevenslr39990@notify.bestcase.com; hopkinr39990@notify.bestcase.com; schroppjr39990@notify.bestcase.com
- Patricia B. Jefferson pjefferson@milesstockbridge.com
- Katherine A. (UST) Levin Katherine.A.Levin@usdoj.gov, brenda.b.wilmore@usdoj.gov
- US Trustee - Baltimore USTPRegion04.BA.ECF@USDOJ.GOV
- Maurice Belmont VerStandig mac@mbvesq.com, lisa@mbvesq.com
- David Cohen david@ecpcapitalpartners.com

/s/ Craig M. Palik _____
Craig M. Palik

Exhibit A

Craig M. Palik

From: David Cohen <david@ecpcapitalpartners.com>
Sent: Thursday, May 14, 2020 3:22 PM
To: Zvi Guttman
Cc: Craig M. Palik
Subject: Perry & Jonathan Resnick EPLI Payments Due/ Malpractice Insurance
Attachments: Jonathan Resnick.pdf; Perry Resnick.pdf

Zvi,

Pe your request, please find payment schedule of invoices for the Law Offices of Jonathan & Perry Resnick for the malpractice insurance.

Kindly confirm receipt of this email.

Sincerely,

David

--

David Cohen
President
David@EPCCapitalPartners.com
EPCCapitalPartners.com
Cell: 561.665.0466
Office: 561.218.9800

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[ECP Facebook](#)



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Begin forwarded message:

From: Shawn McMurtrie <mcmurtrie.fairway@gmail.com>
Subject: Re: Perry & Jonathan Resnick EPLI Payments Due

Date: May 14, 2020 at 2:36:45 PM EDT

To: dcohen101@me.com

Hello,

Attached you will find payment schedules along with past payment invoices for Jonathan & Perry.

Jonathan:

Payment of \$385.21 needs to be paid before 5/16/2020 at 12:01 or policy will cancel

Payment of \$366.87 needs to be paid by 5/19/2020

Perry:

Payment of \$140.35 needs to be paid before 5/19/2020 at 12:01 or policy will cancel

Payment of \$127.59 needs to be paid by 5/30/2020

Regards,

Shawn McMurtrie

--

Shawn McMurtrie

Fairway Insurance Inc.

Vice President

(410) 583-1300 Direct

(410) 823-2510 Fax

Like us on Facebook!

<https://www.facebook.com/#!/pages/Fairway-Insurance-Inc/348760391886079>

This email transmission may contain CONFIDENTIAL and PRIVILEGED information. If you are not the intended recipient, please notify the sender by email, do not disseminate and delete immediately.

Account Details | IPFS Corporation

Payment Schedule
for Jonathan Resnick

Page 1 of 1

Payment #	Amount	Due Date	Paid Date
1	366.87 385.21	04/19/2020	←
2	366.87	05/19/2020	←
3	366.87	06/19/2020	
4	366.87	07/19/2020	
5	366.87	08/19/2020	
6	366.87	09/19/2020	
7	366.87	10/19/2020	
8	366.87	11/19/2020	
9	366.87	12/19/2020	
10	366.87	01/19/2021	
11	366.87	02/19/2021	

IPFS CORPORATION

P.O. BOX 412086
 KANSAS CITY MO 64141-2086
 (866) 412-2560 - FAX: (410) 981-0194

ipfs.com

JONATHAN S RESNICK
 3655A OLD COURT RD STE 1
 BALTIMORE, MD 21208-3959

NOTICE OF PAYMENT DUE		
Date Mailed	Account Number	Due Date
5/14/2020	MDB-692100	4/19/2020

FOR QUESTIONS, PLEASE CALL: (866) 412-2560

IMPORTANT

To protect your account please make sure that your payment is made on or before the payment due date shown.

MAKE CHECK OR MONEY ORDER PAYABLE to IPFS CORPORATION and return the payment and this notice to the address shown on coupon.

Go Green!

Register for eForms today. Instead of paper bills and documents, you'll receive email notices from IPFS Corporation. Visit us at ipfs.com to learn more.

Current Balance	Payment Due
\$4,035.57	\$366.87

PLEASE MAKE ALL PAYMENTS TO ONE OF THE ADDRESSES LISTED BELOW

To ensure proper credit, please send the coupon below with your payment and write your account number on your check.

Make payments, view account information or register for eForms at ipfs.com.
 First time users please use access code to register.

DETACH HERE

Written notifications on this coupon will NOT be received. To ensure proper credit, include coupon with payment.

PREBIL - Web (Agent)

JONATHAN S RESNICK
 3655A OLD COURT RD STE 1
 BALTIMORE, MD 21208-3959

PAYMENT COUPON		
PAYMENT NO.	ACCOUNT NUMBER	DUE DATE
1	MDB-692100	04/19/20

For overnight or priority delivery, please mail to: IPFS Corporation 1055 BROADWAY 11TH FLOOR KANSAS CITY MO 64105.	Make payments, view account information or register for eForms at ipfs.com . First time users please access to register. For questions, please call (866) 412-2560
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PAYMENT DUE	\$366.87
OUTSTANDING FEES DUE	\$0.00
PAST DUE AMOUNT	\$0.00
PAYMENT DUE	\$366.87
IF RECEIVED AFTER 04/24/20	
A LATE FEE WILL APPLY	\$18.34
PLEASE PAY THIS AMOUNT	\$385.21

MAKE CHECK PAYABLE AND REMIT TO:
 IPFS CORPORATION
 P.O BOX 32144
 NEW YORK, NY 10087-2144

Account Details | IPFS Corporation

6	127.59 140.35	04/30/2020	←
7	127.59	05/30/2020	←
8	127.59	06/30/2020	
9	127.59	07/30/2020	
10	127.59	08/30/2020	

Payment schedule
for Perry Resnick

IPFS CORPORATION
 P.O. BOX 412086
 KANSAS CITY MO 64141-2086
 (866) 412-2560 - FAX: (410) 981-0194
ipfs.com

NOTICE OF PAYMENT DUE		
Date Mailed	Account Number	Due Date
5/14/2020	MDB-683807	4/30/2020

FOR QUESTIONS, PLEASE CALL: (866) 412-2560

IMPORTANT

To protect your account please make sure that your payment is made on or before the payment due date shown.

MAKE CHECK OR MONEY ORDER PAYABLE to IPFS CORPORATION and return the payment and this notice to the address shown on coupon.

Go Green!

Register for eForms today. Instead of paper bills and documents, you'll receive email notices from IPFS Corporation. Visit us at ipfs.com to learn more.

Current Balance	Payment Due
\$637.95	\$133.97

PLEASE MAKE ALL PAYMENTS TO ONE OF THE ADDRESSES LISTED BELOW

To ensure proper credit, please send the coupon below with your payment and write your account number on your check.

Make payments, view account information or register for eForms at ipfs.com.
 First time users please use access code to register.

DETACH HERE

Written notifications on this coupon will NOT be received. To ensure proper credit, include coupon with payment.

PREBIL - Web (Agent)

LAW OFFICE OF PERRY A RESNICK
 3655-A OLD COURT RD
 BALTIMORE, MD 21208-3959

PAYMENT COUPON		
PAYMENT NO.	ACCOUNT NUMBER	DUE DATE
6	MDB-683807	04/30/20

For overnight or priority delivery, please mail to: IPFS Corporation 1055 BROADWAY 11TH FLOOR KANSAS CITY MO 64105	Make payments, view account information or register for eForms at ipfs.com . First time users please access to register. For questions, please call (866) 412-2560
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PAYMENT DUE	\$127.59
OUTSTANDING FEES DUE	\$6.38
PAST DUE AMOUNT	\$0.00
PAYMENT DUE	\$133.97
IF RECEIVED AFTER 05/05/20	
A LATE FEE WILL APPLY	\$6.38
PLEASE PAY THIS AMOUNT	\$140.35

MAKE CHECK PAYABLE AND REMIT TO:
 IPFS CORPORATION
 P.O BOX 32144
 NEW YORK, NY 10087-2144

Exhibit B

Craig M. Palik

From: Craig M. Palik
Sent: Tuesday, April 28, 2020 11:45 AM
To: Zvi Guttman
Cc: mac@mbvesq.com; David Cohen
Subject: RE: Questions

Zvi:

- Following on our discussion yesterday and in addition to the answers to the questions below. Jonathan Resnick has 1 banker box of client files that Joy Wise was working on. He took possession when she was locked out of the office. Joy Wise has no other files and to Jonathan Resnick's knowledge there are no other files located offsite.
- Joy wise does have a laptop computer in her possession that belongs to the law offices of Jonathan Resnick, LLC. She will be returning it.
- You referenced a filing cabinet in Joy Wise's office that appeared to have files removed. Any files that were in the filing cabinet you mention were transferred to Donna's office.

Craig

From: Craig M. Palik
Sent: Tuesday, April 28, 2020 11:08 AM
To: 'Zvi Guttman' <zvi@zviguttman.com>
Subject: Questions

Zvi:

Answers to your questions about records from my discussion with Jonathan Resnick:

Tax returns with schedules, statements, and W2s for the past two years

- 2018 not filed. 2017 the last time returns were filed. Bonnie Norfolk handled and she may know what happened to these records. Jonathan Resnick was not able to locate or retrieve after she was fired in July 2019. Katz Abosh was the accounting firm that prepared the returns.

Year-to-date financial statements for the current year – balance sheet/profit & loss statement;

- Not maintained.

Three most recent bank statements for all accounts open in any of the three months prior to the petition date

- May be in the office Jonathan Resnick does not know were. BB&T can provide copies.

Proof of property and liability insurance.

- May be in then office, but Jonathan Resnick does not know where. Fairway Insurance can provide copies.

Craig



Craig M. Palik

*Principal**

McNamee Hosea

6411 Ivy Lane, Suite 200 o 301.441.2420

Greenbelt, Maryland 20770 F 301.982.9450

Facebook | mhlawyers.com

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Disclosure Required by IRS Circular 230: *In accordance with IRS requirements, we wish to inform you that, to the extent this communication contains tax advice, it is not intended or written to be used for the purpose of 1) avoiding tax penalties that may be imposed on the taxpayer by the Internal Revenue Service, or 2) promoting, marketing or recommending to another party any transaction or matter addressed herein.*

Exhibit C

Craig M. Palik

From: Craig M. Palik
Sent: Monday, May 4, 2020 9:44 AM
To: Zvi Guttman
Cc: David Cohen; mac@mbvesq.com
Subject: RE: Resnick Case Nos.: 20-12822, 20-12822, and 20-14188

Zvi:

As David is copied, I will let him respond to the extent he has any knowledge. I will also ask Jonathan. I personally have no information.

Craig



Craig M. Palik

*Principal**

McNamee Hosea

6411 Ivy Lane, Suite 200 o 301.441.2420
Greenbelt, Maryland 20770 F 301.982.9450

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From: Zvi Guttman <zvi@zviguttman.com>
Sent: Monday, May 4, 2020 8:19 AM
To: Craig M. Palik <cpalik@mhlawyers.com>
Cc: David Cohen <david@ecpcapitalpartners.com>; mac@mbvesq.com
Subject: Re: Resnick Case Nos.: 20-12822, 20-12822, and 20-14188

I have been unable to locate any records of what was deposited into any of the several IOLTA accounts or the significance/difference between them. Are there check registers? Is there an IOLTA accounting or am I just supposed to guess whose money is in which account and in what amounts?

Zvi Guttman

(410) 302 1093 cell

Please respond to Zvi@zviguttman.com

This was typed by full size fingers on a diminutive mobile device. Please excuse brevity, auto(in)correct and typos/grammatical errors.

On May 3, 2020, at 9:01 PM, Zvi Guttman <Zvi@zviguttman.com> wrote:

Craig:

Thank you. The current universe of requested access was/is:

- A. Gmail (received and works)
- B. Domain name(s) (Not received) This may be through Google.
- C. LawAlign (I will check with Jeff)
- D. CasePeer (I could not get this to work as it was seeking an email address.)
- E. Quickbooks (Did not work. As with LawAlign it appears to be looking for an email address rather than a login ID)
- F. Dropbox (Not provided)
- G. Phone System/Star2Star (**)
- H. Amazon Server (Not provided)
- I. Microsoft 365 (Not provided)
- J. Workstation logins (Not provided)

Please let me know what additional information you do or do not have.

In addition, please let me know which products had a credit card payment associated with them and the amount of and when the next payment is due (are they annual or monthly?)

Zvi Guttman

The Law Offices of Zvi Guttman, P.A.

Post Office Box 32308

Baltimore, Maryland 21282

(410) 580-0500 Phone

(410) 580-0700 Fax

(410) 302-1093 Cell

www.Guttman.Law

From: Craig M. Palik [mailto:cpalik@mhlawyers.com]
Sent: Friday, May 01, 2020 3:26 PM
To: zvi_zviguttman.com <zvi@zviguttman.com>
Cc: David Cohen <david@ecpcapitalpartners.com>; mac@mbvesq.com
Subject: FW: Resnick Case Nos.: 20-12822, 20-12822, and 20-14188

Zvi:

See the login and password information below received from David Cohen. A few points of note:

1. The referenced accounts were used by the Debtors. However, all of these accounts were registered with/owned by ECP Capital Partners (David's company) and it paid the fees while these accounts were being utilized.
2. ECP has not been reimbursed for its expenses in maintaining these accounts.
3. Some of the accounts will likely require a credit card or other form of security of payment/deposit and/or payment of past due fees to be granted access.
4. There are privileged and/or work product communications contained in these accounts that you will now have access to. Specifically, Krunchcash and/or other parties should not be provided access (e.g. information sensitive to the litigation that is pending in Florida).
5. If there are any issues in accessing the accounts, please let us know and we will assist you.

Please let me know if you need anything else.

Craig

<image001.png>

Craig M. Palik
Principal*

McNamee Hosea

6411 Ivy Lane, Suite 200 o 301.441.2420
Greenbelt, Maryland 20770 f 301.982.9450

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From: David Cohen <david@ecpcapitalpartners.com>
Sent: Friday, May 1, 2020 2:08 PM
To: Craig M. Palik <cpalik@mhlawyers.com>; David Cohen <dcohen101@mac.com>; Mac VerStandig <mac@mbvesq.com>
Subject: Fwd: Resnick Case Nos.: 20-12822, 20-12822, and 20-14188

----- Forwarded message -----

From: David Cohen <david@ecpcapitalpartners.com>
Date: Fri, May 1, 2020 at 2:03 PM
Subject: Re: Resnick Case Nos.: 20-12822, 20-12822, and 20-14188
To: Mac VerStandig <mac@mbvesq.com>

Mac,

Kindly confirm receipt of this email .

I understand , we are working on getting the passwords.
The Quick Books online was last used September 2019
It was set up by an independent consultant who no longer works for me or Jonathan.
I have reached out to him to reset the passwords if possible.
The last user id and password I have is :

Quickbooks Online

User id: js[REDACTED]
Password: Sun[REDACTED]

This is the current login and password information for the other software :

Case Peer

User Id: D[REDACTED]
Password: di[REDACTED]

Google Gmail

Domain name : Resnicklawgroup.org
Login : Zvi[REDACTED]
Password: Zvi2[REDACTED]

Star2Star

Login : dav[REDACTED]
Password: Zvi[REDACTED]

Law Align

Law Align is set up by Jeff Hackman
I do not have login or passwords , it is also set up at each work stating using File Maker Pro

Microsoft 365, I do not have any information.

Sincerely,

David Cohen

From: Zvi Guttman <zvi@zviguttman.com>
Date: May 1, 2020 at 9:16:30 AM PDT
To: David Cohen <david@ecpcapitalpartners.com>
Cc: "Craig M. Palik" <cpalik@mhlawyers.com>, Mac VerStandig <mac@mbvesq.com>
Subject: Re: Resnick Case Nos.: 20-12822, 20-12822, and 20-14188

All:

I will be brief but succinct. The failure to provide the requested* login and password information is a violation of the Bankruptcy Code and sanctionable. If I do not have all of the requested login/passwords by 5:00 PM today, I will seek emergency relief from the Bankruptcy Court including compensatory and punitive damages.

* In addition to the previously requested logins I am also requesting login/password information for the following:

- A. Dropbox
- B. Phone System (to change messages, access email, etc.)
- C. Amazon Server
- D. Microsoft 365
- E. Workstation logins

There may be others. I need them too.

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On Thu, Apr 30, 2020 at 6:41 PM Zvi Guttman <Zvi@zviguttman.com> wrote:

For the record, I have not received the administrative level login and password information for any of the following:

- A. Gmail
- B. Domain name(s)
- C. LawAlign
- D. CasePeer
- E. Quickbooks

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