

Fill in this information to identify the case:

United States Bankruptcy Court for the:

MIDDLE DISTRICT OF TENNESSEE

Case number (if known)

Chapter 11

☐ Check if this is an amended filing

Official Form 201

Voluntary Petition for Non-Individuals Filing for Bankruptcy

04/25

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and the case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1. Debtor's name Hiawatha Manor Association, Inc.

2. All other names debtor used in the last 8 years
Include any assumed names, trade names and doing business as names

Hiawatha Manor
Hiawatha Manor 1

3. Debtor's federal Employer Identification Number (EIN) 64-0654512

4. Debtor's address Principal place of business

8007 Cherokee Trl
Crossville, TN 38572

Number, Street, City, State & ZIP Code

Cumberland
County

Mailing address, if different from principal place of business

7380 W Sand Lake Rd Suite 130
Orlando, FL 32819

P.O. Box, Number, Street, City, State & ZIP Code

Location of principal assets, if different from principal place of business

Number, Street, City, State & ZIP Code

5. Debtor's website (URL)

6. Type of debtor

☒ Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))

☐ Partnership (excluding LLP)

☐ Other. Specify:

7. Describe debtor's business A. Check one:

- ☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))
☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
☐ Railroad (as defined in 11 U.S.C. § 101(44))
☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))
☒ None of the above

B. Check all that apply

- ☐ Tax-exempt entity (as described in 26 U.S.C. §501)
☐ Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. §80a-3)
☐ Investment advisor (as defined in 15 U.S.C. §80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor. See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.

8. Under which chapter of the Bankruptcy Code is the debtor filing?

Check one:

- ☐ Chapter 7
☐ Chapter 9

☒ Chapter 11. Check all that apply:

- ☐ Debtor's aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$3,424,000 (amount subject to adjustment on 4/01/28 and every 3 years after that).
☐ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D). If the debtor is a small business debtor, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if all of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
☐ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D), and it chooses to proceed under Subchapter V of Chapter 11.
☐ A plan is being filed with this petition.
☐ Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
☐ The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the *Attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.
☐ The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

☐ Chapter 12

9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?

- ☒ No.
☐ Yes.

If more than 2 cases, attach a separate list.

District	_____	When	_____	Case number	_____
District	_____	When	_____	Case number	_____

10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?

- ☒ No
☐ Yes.

Debtor Hiawatha Manor Association, Inc. Case number (if known) _____
Name

List all cases. If more than 1,
attach a separate list

Debtor _____ Relationship _____
District _____ When _____ Case number, if known _____

11. Why is the case filed in this district?

Check all that apply:

- ☒ Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.
- ☐ A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?

☒ No

☐ Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.

Why does the property need immediate attention? (Check all that apply.)

☐ It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.

What is the hazard? _____

☐ It needs to be physically secured or protected from the weather.

☐ It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).

☐ Other _____

Where is the property? _____

Number, Street, City, State & ZIP Code

Is the property insured?

☐ No

☐ Yes. Insurance agency _____

Contact name _____

Phone _____

Statistical and administrative information

13. Debtor's estimation of available funds

Check one:

- ☐ Funds will be available for distribution to unsecured creditors.
- ☒ After any administrative expenses are paid, no funds will be available to unsecured creditors.

14. Estimated number of creditors

☒ 1-49

☐ 50-99

☐ 100-199

☐ 200-999

☐ 1,000-5,000

☐ 5001-10,000

☐ 10,001-25,000

☐ 25,001-50,000

☐ 50,001-100,000

☐ More than 100,000

15. Estimated Assets

☐ \$0 - \$50,000

☐ \$50,001 - \$100,000

☐ \$100,001 - \$500,000

☐ \$500,001 - \$1 million

☒ \$1,000,001 - \$10 million

☐ \$10,000,001 - \$50 million

☐ \$50,000,001 - \$100 million

☐ \$100,000,001 - \$500 million

☐ \$500,000,001 - \$1 billion

☐ \$1,000,000,001 - \$10 billion

☐ \$10,000,000,001 - \$50 billion

☐ More than \$50 billion

16. Estimated liabilities

☐ \$0 - \$50,000

☐ \$50,001 - \$100,000

☐ \$100,001 - \$500,000

☐ \$500,001 - \$1 million

☒ \$1,000,001 - \$10 million

☐ \$10,000,001 - \$50 million

☐ \$50,000,001 - \$100 million

☐ \$100,000,001 - \$500 million

☐ \$500,000,001 - \$1 billion

☐ \$1,000,000,001 - \$10 billion

☐ \$10,000,000,001 - \$50 billion

☐ More than \$50 billion

Debtor **Hiawatha Manor Association, Inc.**
Name

Case number (if known)

Request for Relief, Declaration, and Signatures

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

**17. Declaration and signature
of authorized
representative of debtor**

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

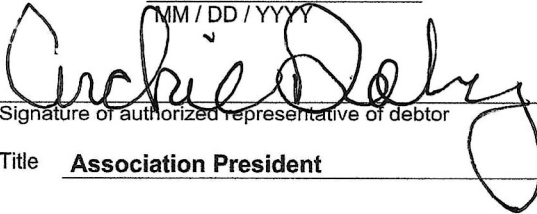
I have been authorized to file this petition on behalf of the debtor.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 05/06/2025

MM / DD / YYYY

x 

Signature of authorized representative of debtor

Archie Doby

Printed name

Title **Association President**

18. Signature of attorney X /s/ Blake D. Roth

Date 05/06/2025

Signature of attorney for debtor

MM / DD / YYYY

Blake D. Roth 031499

Printed name

Holland & Knight LLP

Firm name

511 Union St

Suite 2700

Nashville, TN 37219

Number, Street, City, State & ZIP Code

Contact phone 615-850-8749

Email address blake.roth@hklaw.com

031499 TN

Bar number and State

Fill in this information to identify the case:

Debtor name Hiawatha Manor Association, Inc.

United States Bankruptcy Court for the: MIDDLE DISTRICT OF TENNESSEE

Case number (if known) _____

☐ Check if this is an amended filing

Official Form 202

Declaration Under Penalty of Perjury for Non-Individual Debtors

12/15

An individual who is authorized to act on behalf of a non-individual debtor, such as a corporation or partnership, must sign and submit this form for the schedules of assets and liabilities, any other document that requires a declaration that is not included in the document, and any amendments of those documents. This form must state the individual's position or relationship to the debtor, the identity of the document, and the date. Bankruptcy Rules 1008 and 9011.

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Declaration and signature

I am the president, another officer, or an authorized agent of the corporation; a member or an authorized agent of the partnership; or another individual serving as a representative of the debtor in this case.

I have examined the information in the documents checked below and I have a reasonable belief that the information is true and correct:

- ☐ *Schedule A/B: Assets—Real and Personal Property* (Official Form 206A/B)
- ☐ *Schedule D: Creditors Who Have Claims Secured by Property* (Official Form 206D)
- ☐ *Schedule E/F: Creditors Who Have Unsecured Claims* (Official Form 206E/F)
- ☐ *Schedule G: Executory Contracts and Unexpired Leases* (Official Form 206G)
- ☐ *Schedule H: Codebtors* (Official Form 206H)
- ☐ *Summary of Assets and Liabilities for Non-Individuals* (Official Form 206Sum)
- ☐ *Amended Schedule*
- ☒ *Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders* (Official Form 204)
- ☐ Other document that requires a declaration _____

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 05/06/2025

X /s/ Archie Doby

Signature of individual signing on behalf of debtor

Archie Doby

Printed name

Association President

Position or relationship to debtor

WRITTEN CONSENT OF THE BOARD OF DIRECTORS
OF
HIAWATHA MANOR ASSOCIATION, INC.

By and through this WRITTEN CONSENT of The BOARD OF DIRECTORS (the "**Board**") of HIAWATHA MANOR ASSOCIATION, INC. (the "**Association**"), and pursuant to the Bylaws of the Association and Tenn. Code Ann. § 48-58-202, the Board hereby agrees by Written Consent to the following:

WHEREAS, the Association is the managing entity of those certain timeshare condominiums known as Hiawatha Manor and Hiawatha Manor I (the "**Condominiums**") pursuant to those certain Declarations of Condominium recorded in Deed Book 216, Page 209, et seq. and Deed Book 231, Page 215, et seq., respectively, in the Office of the Register of Deeds for Cumberland County, Tennessee (the "**Declarations**"); and

WHEREAS, Tenn. Code Ann. § 48-58-202 permits action required or permitted to be taken at a board of directors' meeting to be taken without a meeting if all directors consent to taking such action without a meeting, and the action is evidenced by one or more written consents describing the action taken, signed by each director; and

WHEREAS, the Board has considered the financial and operational aspects of the Association's business and has reviewed the historical performance of the Condominiums as a timeshare; and

WHEREAS, the Board has reviewed and considered certain materials presented by the management of the Association and the Association's financial and legal advisors, including, but not limited to, materials regarding the liabilities and obligations of the Association, its liquidity, strategic alternatives available to it, especially to operate as a whole condominium HOA, termination of the timeshare regime, the need to sell the timeshare property as whole condominium property, and the effect of the forgoing on the Association's business and financial condition; and

WHEREAS, the Board has had adequate opportunity to consult with management of the Association and the Association's advisors regarding the materials presented to the Board, obtain additional information, and to fully consider each of the strategic alternatives available to the Association;

NOW, THEREFORE, BE IT:

RESOLVED, that in the judgment of the Board, it is desirable and in the best interests of the Association, its creditors, employees and other interested parties that the Association shall be and hereby is authorized to file or cause to be filed a voluntary petition for relief (the "**Chapter 11 Case**") under the provisions of Chapter 11 of Title 11 of the United States Code (the "**Bankruptcy Code**") in a court of proper jurisdiction as determined by the Association's bankruptcy counsel (the "**Bankruptcy Court**"); and

RESOLVED FURTHER, that any Proper Officer be, and hereby is, on behalf of the Association, authorized and directed the Management Company, HPP Property Services, LLC, d/b/a Lemonjuice Solutions, a Maryland Limited Liability Company ("**Lemonjuice**"), under our

Management and Repositioning Services Agreement made effective February 28, 2024 (the “**Management and Repositioning Agreement**”), to select and retain a law firm or lawyer as bankruptcy counsel to the Association to represent the Association and assist the Association in carrying out its duties under Chapter 11 of the Bankruptcy Code, and to take any and all actions to advance the Association’s rights in connection therewith, including preparation of pleadings and filings in the Chapter 11 Case, **and to effectuate the advice and counsel of Lemonjuice and the HOA-appointed counsel**; and any Proper Officer is hereby authorized and directed to execute appropriate retention agreements, pay appropriate retainers prior to and immediately upon the filing of the bankruptcy, and to cause to be filed in the Association’s Chapter 11 Case an appropriate application for authority to retain the services of the said law firm or lawyer; and

RESOLVED FURTHER, that the Secretary and the President of the Association (the “**Proper Officers**”) be, and each of them hereby is, authorized on behalf of the Association to execute, verify and file all petitions, schedules, lists, and other papers or documents, and to take and perform any and all further actions and steps that any such Proper Officer deems necessary, desirable and proper in connection with the Association’s Chapter 11 Case, including, without limitation, any action necessary to maintain the ordinary course operation of the Association’s businesses with a view to the successful prosecution of such case; and

RESOLVED FURTHER, that any Proper Officer be, and hereby is, authorized and directed to employ any other professionals necessary to assist the Association in carrying out its duties under the Bankruptcy Code; and in connection therewith, any Proper Officer is hereby authorized and directed to execute appropriate retention agreements, pay appropriate retainers prior to or immediately upon the filing of the Chapter 11 Case and cause to be filed appropriate applications with the Bankruptcy Court for authority to retain the services of any other professionals, as necessary, and on such terms as are deemed necessary, desirable and proper; and

RESOLVED FURTHER, that any and all actions heretofore taken by any Proper Officer or the Board in the name and on behalf of the Association in furtherance of the purpose and intent of any or all of the foregoing resolutions be, and hereby are, ratified, confirmed, and approved in all respects.

RESOLVED FURTHER, that this Written Consent may be executed in one or more counterparts, each of which shall be deemed an original and all of which taken together shall constitute one and the same instrument, and that signatures transmitted by electronic or facsimile means shall be valid and binding to the same extent as original signatures.

IN WITNESS WHEREOF, the undersigned President of HIAWATHA MANOR ASSOCIATION, INC., does hereby certify that the foregoing resolutions have been approved, authorized, and adopted by the Board of Directors, and I affix my signature hereto as the initial signatory to evidence my approval.

Dated this 14th day of March 2025.


Signature: *Archie Doby*
Archie Doby (Mar 14, 2025 11:40 CDT)
Archie Doby, President

BOARD MEMBER ATTESTATIONS

I, the undersigned Director of HIAWATHA MANOR ASSOCIATION, INC., do hereby attest that I have reviewed and approve the foregoing resolutions, and my signature below evidences my consent and agreement.

Signature: 
Ollie J. Lee (Mar 14, 2025 13:28 EDT)
Ollie Lee, Director

I, the undersigned Director of HIAWATHA MANOR ASSOCIATION, INC., do hereby attest that I have reviewed and approve the foregoing resolutions, and my signature below evidences my consent and agreement.

Signature: 
Dr. Robert Schreiber (Mar 14, 2025 11:47 PDT)
Dr. Robert Schreiber, Director











Board Written Consent Resolution for BK - unsigned

Final Audit Report


2025-03-14

Created:	2025-03-14
By:	Jaclyn Addeo (jaclyn.addeo@lemonjuice.biz)
Status:	Signed
Transaction ID:	CBJCHBCAABAATHQCDfzr6-CIZW3MTmTsKJg0GNPVMym

"Board Written Consent Resolution for BK - unsigned" History

-  Document created by Jaclyn Addeo (jaclyn.addeo@lemonjuice.biz)
2025-03-14 - 4:26:09 PM GMT
-  Document emailed to addoby@benlomand.net for signature
2025-03-14 - 4:27:57 PM GMT
-  Email viewed by addoby@benlomand.net
2025-03-14 - 4:38:28 PM GMT
-  Signer addoby@benlomand.net entered name at signing as Archie Doby
2025-03-14 - 4:40:11 PM GMT
-  Document e-signed by Archie Doby (addoby@benlomand.net)
Signature Date: 2025-03-14 - 4:40:13 PM GMT - Time Source: server
-  Document emailed to olee@leeuniversity.edu for signature
2025-03-14 - 4:40:15 PM GMT
-  Email viewed by olee@leeuniversity.edu
2025-03-14 - 5:25:35 PM GMT
-  Signer olee@leeuniversity.edu entered name at signing as OllieJ. Lee
2025-03-14 - 5:28:49 PM GMT
-  Document e-signed by OllieJ. Lee (olee@leeuniversity.edu)
Signature Date: 2025-03-14 - 5:28:51 PM GMT - Time Source: server
-  Document emailed to drbobrjs@gmail.com for signature
2025-03-14 - 5:28:52 PM GMT




 Email viewed by drbobrjs@gmail.com

2025-03-14 - 6:40:18 PM GMT

 Signer drbobrjs@gmail.com entered name at signing as robert schreiber

2025-03-14 - 6:47:43 PM GMT

 Document e-signed by robert schreiber (drbobrjs@gmail.com)

Signature Date: 2025-03-14 - 6:47:45 PM GMT - Time Source: server

 Agreement completed.

2025-03-14 - 6:47:45 PM GMT



Adobe Acrobat Sign

**United States Bankruptcy Court
Middle District of Tennessee**

In re Hiawatha Manor Association, Inc.

Debtor(s)

Case No.

Chapter

11

LIST OF EQUITY SECURITY HOLDERS

Following is the list of the Debtor's equity security holders which is prepared in accordance with rule 1007(a)(3) for filing in this Chapter 11 Case

Name and last known address or place of business of holder	Security Class	Number of Securities	Kind of Interest
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-NONE-

DECLARATION UNDER PENALTY OF PERJURY ON BEHALF OF CORPORATION OR PARTNERSHIP

I, the **Association President** of the corporation named as the debtor in this case, declare under penalty of perjury that I have read the foregoing List of Equity Security Holders and that it is true and correct to the best of my information and belief.

Date 05/06/2025

Signature /s/ Archie Doby

Archie Doby

*Penalty for making a false statement of concealing property: Fine of up to \$500,000 or imprisonment for up to 5 years or both.
18 U.S.C. §§ 152 and 3571.*

**United States Bankruptcy Court
Middle District of Tennessee**

In re **Hiawatha Manor Association, Inc.**

Debtor(s)

Case No.

Chapter

11

VERIFICATION OF CREDITOR MATRIX

I, the Association President of the corporation named as the debtor in this case, hereby verify that the attached list of creditors is true and correct to the best of my knowledge.

Date: 05/06/2025

/s/ Archie Doby

Archie Doby/Association President

Signer/Title

HIAWATHA MANOR ASSOCIATION, INC.
7380 W SAND LAKE RD SUITE 130
ORLANDO FL 32819

BLAKE D. ROTH
HOLLAND & KNIGHT LLP
511 UNION ST
SUITE 2700
NASHVILLE, TN 37219

CLEAN CUT LAWN CARE

CROWN RESORTS MANAGEMENT LLC
PMB 28046
548 MARKET ST
SAN FRANCISCO CA 94104

CUMBERLAND CO TN ASSESSOR OF PROPERTY
2 S MAIN ST 101
CROSSVILLE TN 38555

FRONTIER
PO BOX 211579
SAINT PAUL MN 55121-2879

FRONTIER COMMUNICATIONS
PO BOX 740407
CINCINNATI OH 45274

LAKE TANSI POA
5050 SHOSHONE LOOP
CROSSVILLE TN 38572

MADDOX COMPANY MECHANICAL
170 CITY LAKE ROAD
CROSSVILLE TN 38572

SELK SANITATION
544 EAST LANE
CROSSVILLE TN 38555

SOUTH CUMBERLAND UTILITY DISTRICT
139 UTILITY DRIVE
CROSSVILLE TN 38572-6739

SPECTRUM ENTERPRISE
CHARTER COMMUNICATIONS
BOX 223085
PITTSBURGH PA 15251

VACATIA
PMB 28046
548 MARKET ST
SAN FRANCISCO CA 94104

VOLUNTEER ENERGY COOPERATIVE
PO BOX 22222
DECATUR TN 37322