

RIMON P.C.

Counsel to the Chapter 7 Trustee
Kenneth P. Silverman, Esq.
100 Jericho Quadrangle Suite 300
Jericho, New York 11753
Brian Powers
Courtney M. Roman

Hearing Date: October 17, 2024

Time: 10:00 a.m.

Objections Due: October 10, 2024

Time: 4:00 p.m.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re:

Chapter 7

BUTH-NA-BODHAIGE, INC.,
Debtor.
-----X

Case No.: 24-10392 (DSJ)

**NOTICE OF HEARING ON CHAPTER 7 TRUSTEE'S
MOTION FOR AN ORDER GRANTING TRUSTEE'S MOTION
PURSUANT TO BANKRUPTCY CODE §542(a) DIRECTING THE
TURNOVER OF FUNDS TO THE TRUSTEE BY PAYPAL, INC. AND AN
ACCOUNTING OF THE TRANSFER OF ANY SUCH FUNDS TO THIRD PARTIES**

PLEASE TAKE NOTICE THAT, upon the motion (the "Motion") of Kenneth P. Silverman, the chapter 7 trustee (the "Trustee") for the bankruptcy estate of Buth-Na-Bodhaige, Inc. (the "Debtor"), by his counsel, Rimon P.C., will move before the Honorable David S. Jones, United States Bankruptcy Judge, for the United States Bankruptcy Court of the Southern District of New York, via Zoom for Government, on **October 17, 2024 at 10:00 a.m.** (the "Hearing"), or as soon thereafter as counsel can be heard, for entry of an order, substantially in the form annexed to the Motion as Exhibit A, for signature directing PayPal, Inc. ("PayPal") to turnover the proceeds of the Debtor's account maintained in a digital wallet held with PayPal with an account balance as of the Petition Date in the amount of \$128,711.90, and granting such other, further, and different relief as this court deems just and proper.

PLEASE TAKE FURTHER NOTICE, that prior to the Hearing, any party wishing to appear at the Hearing is required to register their appearance by 4:00 p.m. one (1) business day in advance of



the Hearing using the Court's eCourt Appearances platform: <https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl>.

PLEASE TAKE FURTHER NOTICE, that objections to the relief sought in the Motion shall be in writing, conform to the requirements of the Bankruptcy Code, Bankruptcy Rules, and the Local Rules of this Court, must set forth the name of the objecting party, the basis for the objection and the specific grounds therefore, and must be filed electronically with the Bankruptcy Court in accordance with General Order M-399 (General Order M-399 and the User's Manual for the Electronic Case Filing System may be found at www.nysb.uscourts.gov, the official website for the Bankruptcy Court) by registered users of the Bankruptcy Court's case filing system, and by all other parties in interest on a disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with courtesy copies delivered directly to Chambers), and must be served upon (i) counsel to the Trustee, Rimon P.C., 100 Jericho Quadrangle, Suite 300, Jericho, New York, 11753, Attn: Brian Powers, Esq. and (ii) The Office of the United States Trustee, Alexander Hamilton Custom House, One Bowling Green, Room 534, New York, New York, 10004-1408, Attn: Mark Bruh, Esq., no later than **October 10, 2024 at 4:00 p.m.**

PLEASE TAKE FURTHER NOTICE, that the Hearing may be adjourned without further notice other than the announcement of such adjournment in open Court or by the filing of such notice of adjournment on the docket sheet for the Debtor's case.

PLEASE TAKE FURTHER NOTICE, that you need not appear at the Hearing if you do not object to the relief requested in the Motion.

Dated: Jericho, New York
September 11, 2024

RIMON P.C.
Counsel to Kenneth P. Silverman, Esq.,
the Chapter 7 Trustee

By: s/ Brian Powers
Brian Powers
Partner
100 Jericho Quadrangle, Suite 300
Jericho, New York 11753

RIMON P.C.

Counsel to the Chapter 7 Trustee
Kenneth P. Silverman, Esq.
100 Jericho Quadrangle Suite 300
Jericho, New York 11753
Brian Powers
Courtney M. Roman

Hearing Date: October 17, 2024
Time: 10:00 a.m.

Objections Due: October 10, 2024
Time: 4:00 p.m.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re:

Chapter 7

BUTH-NA-BODHAIGE, INC.,

Case No.: 24-10392 (DSJ)

Debtor.
-----X

**TRUSTEE'S MOTION FOR AN ORDER
PURSUANT TO BANKRUPTCY CODE §542(a) DIRECTING THE
TURNOVER OF FUNDS TO THE TRUSTEE BY PAYPAL, INC. AND AN
ACCOUNTING OF THE TRANSFER OF ANY SUCH FUNDS TO THIRD PARTIES**

Kenneth P. Silverman, Esq., the Chapter 7 Trustee (the "Trustee") of the estate of Buth-Na-Bodhaige, Inc. (the "Debtor"), hereby seeks the entry of an Order, substantially in the form annexed hereto as **Exhibit A**, pursuant to Bankruptcy Code §542(a), directing: (i) the immediate turnover by PayPal, Inc., ("PayPal") to the Trustee of all funds held in the account the Debtor maintained with PayPal (the "Funds"); (ii) a full accounting (the "Accounting") of any of the Funds that are no longer in the possession, custody or control of PayPal on or after the Petition Date (defined herein), and (iii) and for such other and further relief as the Court deems just and proper, respectfully sets forth and represents:

BACKGROUND

1. On March 8, 2024 (the "Petition Date"), the Debtor filed a voluntary petition for relief pursuant to chapter 7 of the Bankruptcy Code.

2. On March 9, 2024, Kenneth P. Silverman, Esq., was appointed the interim chapter 7 trustee of the Debtor's estate, and has since duly qualified.

Attempts to have the Account turned over to the estate

3. The Trustee was advised by the Debtor that the Debtor maintained a digital wallet account with Paypal, with an account balance as of the Petition Date in the amount of \$128,711.90 (the "Account Balance") as of March 26, 2024. The Trustee, through his counsel, immediately reached out to PayPal to have the Account Balance turned over to the estate.

4. On April 8, 2024, an email to was sent to PayPal requesting the turnover of the account. A true and correct copy of that e-mail is annexed as Exhibit 1 to the Declaration of Kenneth P. Silverman, Esq. (the "Silverman Declaration"), attached hereto as **Exhibit B**.

5. PayPal responded by proposing a three tranche turnover, the first amount of \$100,000 was to be turned over on April 15, 2024, \$20,000 was to be turned over on May 31, 2024, and the final balance was due to be released on August 29, 2024 in the amount of \$8,000.

6. Counsel for the Trustee contacted PapPal to advise that the proposed tranche plan was acceptable to the Trustee, and on April 17, 2024 wiring instructions were sent to and received by PayPal. Annexed to the Silverman Declaration as Exhibit 2 is a true and correct copy of that email.

7. Thereafter, Trustee's counsel followed up through email correspondence with PayPal on April 18, 2024, April 19, 2024, April 22, 2024, April 25, 2024, April 29, 2024, May 7, 2024, and June 11, 2024.

8. On several occasions, employees of the Debtor's parent company, which had online access to the PayPal account, attempted to assist the Trustee in his attempts to have the Proceeds turned over. Those attempts were similarly fruitless.

9. Upon information and belief, at some point during the process, PayPal released the Proceeds to a closed bank account previously maintained by the Debtor with HSBC. The Proceeds were returned to PayPal by HSBC and remain in the Debtor's account with PayPal.

10. On June 27, 2024, counsel sent a final request for a turnover with the wiring instructions and PayPal responded by asking us to contact another department within PayPal to assist with the turnover. Annexed to the Silverman Declaration as Exhibit 3 is a copy of this email.

11. To date, the Trustee has not received a turnover of any of the funds, even though PayPal has agreed that the funds belong to the Debtor and that they would turn over same.

12. More than five months have passed and despite repeated verbal and written requests, PayPal has not cooperated with the Trustee to process the turnover.

THE TRUSTEE IS ENTITLED TO TURNOVER OF THE PROCEEDS

13. Bankruptcy Code §541 states in relevant part:

(a) The commencement of a case under section 301, 302, or 303 of this title creates an estate. Such estate is comprised of all the following property, wherever located and by whomever held:

(1) . . . all legal or equitable interests of the debtor in property as of the commencement of the case...

(6) Proceeds, product, offspring, rents, or profits of or from property of the estate

See 11 U.S.C. §541(a).

14. Pursuant to 11 U.S.C. §541, the Proceeds are property of the estate and, therefore,

should be turned over to the Trustee pursuant to 11 U.S.C. §542, together with a full accounting of any of the Proceeds that are no longer in the possession, custody or control of Bayer.

15. Bankruptcy Code §542 states in relevant part:

- (a) Except as provided in subsection (c) or (d) [not applicable in the instant case] of this section, an entity, other than a custodian, in possession, custody or control, during the case, of property that the trustee may use, sell or lease under section 363 of this title, or that the debtor may exempt under section 522 of this title, shall deliver to the trustee, and account for, such property or the value of such property, unless such property is of inconsequential value or benefit to the estate.

See 11 U.S.C. §542(a).

16. As discussed at length above, there is no dispute that the Proceeds are property of the estate and must be turned over to the Trustee. Notwithstanding, the Trustee has now exhausted all of his options to obtain the turnover without the Court's intervention.

17. Unless this Court orders PayPal to turn over the Proceeds, and to provide an Accounting, the Trustee will be unable to effectively and properly administer the Debtor's estate.

18. No previous application for the relief sought herein has been made to this or any other Court.

WHEREFORE, the Trustee respectfully requests the entry of an order, pursuant to Bankruptcy Code §542(a), and other applicable provisions of the Bankruptcy Code, directing Bayer to: (i) turn over the Proceeds; (ii) provide an Accounting; and (iii) grant such other and further relief as the Court deems just and proper.

Dated: Jericho, New York
September 11, 2024

RIMON P.C.
Counsel to Kenneth P. Silverman, Esq.,
The Chapter 7 Trustee

By: s/ Brian Powers
Brian Powers
Partner
100 Jericho Quadrangle, Suite 300
Jericho, New York 11753

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re:

Chapter 7

BUTH-NA-BODHAIGE, INC.,

Case No.: 24-10392 (DSJ)

Debtor.
-----X

**ORDER GRANTING TRUSTEE’S MOTION FOR AN ORDER
PURSUANT TO BANKRUPTCY CODE §542(a) DIRECTING THE
TURNOVER OF FUNDS TO THE TRUSTEE BY PAYPAL, INC. AND AN
ACCOUNTING OF THE TRANSFER OF ANY SUCH FUNDS TO THIRD PARTIES**

Upon consideration of the motion (the “Motion”) [ECF No. 108] filed by Rimon P.C., attorneys for Kenneth P. Silverman, the Chapter 7 Trustee of Buth-Na-Bodhaige, Inc. (the “Debtor”), directing PayPal, Inc. (“PayPal”) to turnover the proceeds of the Debtor’s account maintained in a digital wallet held with PayPal with an account balance as of the Petition Date in the amount of \$128,711.90 and adequate notice of the Motion having been given; and no objections having been filed with respect to the Motion; and sufficient cause having been shown therefore; and upon the Affidavit of Service of notice of hearing of the Motion on file with the Court; and upon due deliberation and consideration of the facts and circumstances relevant to the matter; and no additional notice being necessary or required; it is now hereby

ORDERED, that the Motion is granted to the extent provided herein; and it is further

ORDERED, that PayPal, is directed to turnover the proceeds in the amount of \$128,711.90 to the Trustee within five (5) business days of entry of this Order; and it is further

ORDERED, that PayPal, is directed to provide a full accounting of all of the proceeds maintained in the account to the Trustee within fourteen (14) days of the entry of this Order; and it is further

ORDERED, that the Trustee be, and hereby is, authorized to do such things, execute such documents, and expend such funds as may be necessary to effectuate the terms and conditions of this Order.

Dated: New York, New York
October __, 2024

HONORABLE DAVID S. JONES
UNITED STATES BANKRUPTCY JUDGE

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re:

Chapter 7

BUTH-NA-BODHAIGE, INC.,

Case No.: 24-10392 (DSJ)

Debtor.
-----X

**DECLARATION OF KENNETH P. SILVERMAN, ESQ. IN
SUPPORT OF CHAPTER 7 TRUSTEE'S MOTION FOR AN ORDER
PURSUANT TO BANKRUPTCY CODE §542(a) DIRECTING THE
TURNOVER OF FUNDS TO THE TRUSTEE BY PAYPAL, INC. AND AN
ACCOUNTING OF THE TRANSFER OF ANY SUCH FUNDS TO THIRD PARTIES**

I, Kenneth P. Silverman, Esq., declare as follows:

1. I am the chapter 7 trustee (the "Trustee") of the bankruptcy estate (the "Estate") of Buth-Na-Bodhaige, Inc. (the "Debtor"), with offices located at 100 Jericho Quadrangle, Suite 300, Jericho, New York 11753. I am duly admitted to practice before this Court and the courts of the State of New York.

2. I submit this declaration (this "Declaration") in support of the motion (the "Motion")¹ seeking entry of an order pursuant to Bankruptcy Code §542(a), directing the immediate turnover by PayPal, Inc., ("PayPal") to the Trustee of all funds held in the account the Debtor maintained with PayPal as of the Petition Date (the "Funds") and granting related relief.

3. I have reviewed the Motion and relevant documents thereto and certify that its contents are true and correct to the best of my knowledge, and those facts are incorporated herein by reference.

¹ All capitalized terms used but not defined herein shall have the meaning ascribed to them in the Application.

The Debtor and the Corporate Structure

4. On March 8, 2024 (the “Petition Date”), the Debtor filed a voluntary petition for relief pursuant to chapter 7 of the Bankruptcy Code.

5. On March 9, 2024, I was appointed the interim chapter 7 trustee of the Debtor’s estate, and have since duly qualified.

The Debtor’s Chapter 7 Case

6. The Debtor was a cosmetic skin care retailer that is a subsidiary of the Body Shop International Limited (“TBSI”), a United Kingdom based company. TBSI is currently in administration in the United Kingdom. Shortly after TBSI entering administration, the Debtor terminated all of its employees, closed all of its retail locations, and filed this chapter 7 case.

7. As part of my review and analysis of the Debtor’s assets, my retained professionals and I determined that the Debtor maintained a digital wallet with PayPal, with an account balance as of the Petition Date, due to the Debtor in the amount of \$128,711.90 (the “Account Balance”). Moreover, I determined that the Account Balance was property of the estate and made several attempts to have the Account Balance turned over to the estate.

Attempts to have the Account turned over to the estate

8. On April 8, 2024, an email to was sent to PayPal requesting the turnover of the account. A true and correct copy of that e-mail is annexed as **Exhibit 1**.

9. While PayPal agreed to turnover the Account Balance, and we agreed to their proposal of a three tranche turnover, and sent them a confirming email with wire instructions, we never received the funds. A true and correct copy of that e-mail is annexed as **Exhibit 2**.

10. My counsel followed up with PayPal through email correspondence on April 18, 2024, April 19, 2024, April 22, 2024, April 25, 2024, April 29, 2024, May 7, 2024, and June 11, 2024.

11. On June 28, 2024, my counsel sent a final request for a turnover of the Account Balance with the wiring instructions and PayPal responded by asking us to contact another department within PayPal to assist with the turnover. A true and correct copy of that e-mail is annexed as **Exhibit 3**.

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

Executed in Jericho, New York on September 10, 2024.

s/ Kenneth P. Silverman
Kenneth P. Silverman, Esq.

Linda S. Tumino

From: Lynne M. Manzolillo, PHR, SHRM-CP
Sent: Monday, April 8, 2024 2:37 PM
To: simohanty@paypal.com
Cc: Brian Powers; Kenneth P. Silverman; Courtney M. Roman; Lynne M_ Manzolillo's Personal Workspace LMM's Emails
Subject: Buth-Na-Bodhaige Inc. d/b/a The Body Shop - Case No. 24-10392-DSJ - SDNY [IMAN-RIMON.FID787608]

Importance: High

Dear Mr. Mohanty,

I am the Paralegal to Kenneth P. Silverman, Esq., in his capacity as the Chapter 7 Trustee of Buth-Na-Bodhaige d/b/a The Body Shop (the "Debtor"), and his counsel, Brian Powers, Esq.

Per your email correspondence below with Max Leadbetter, PayPal was holding \$128,711.90 of the Debtor's funds as of March 26, 2024. Please advise what you require from the Trustee to have the proceeds of the Debtor's PayPal account turned over to the bankruptcy estate.

Kindly contact me directly at 516.479.6316 or via email so that we can effectuate the turnover of these funds into the Trustee's estate bank account in this matter.

Thank you,
Lynne Manzolillo

Lynne M. Manzolillo, PHR, SHRM-CP | Paralegal
RIMON PC

+1 516.479.6316 | lynne.manzolillo@rimonlaw.com
100 Jericho Quadrangle Suite 300, Jericho, NY 11753

www.rimonlaw.com | [See Our International Offices](#) | [Read Our Insights](#)

[Connect on LinkedIn](#) | [Like us on Facebook](#)

This e-mail is sent by a law firm and contains information that may be confidential or privileged. If you have received this communication in error, please reply to the sender (only) and then please delete this message from your inbox as well as any copies. Thank you.

From: Max Leadbetter
Sent: Tuesday, March 26, 2024 10:11 AM
To: Situn Mohanty <simohanty@paypal.com>
Cc: global-hrsc <global-hrsc@paypal.com>; Joanne Wilson <Joanne.Wilson@thebodyshop.com>; Paulo Amorim <Paulo.Amorim@thebodyshop.com>; Andrew McCrea <Andrew.McCrea@thebodyshop.com>
Subject: RE: THE BODY SHOP INTERNATIONAL

Hi Situn,

Our USA paypal account has this balance sitting in it and has not paid out since middle of Feb?

Please can you confirm why this is and how we get it released?



Hi Max, Welcome back

What do you want to get done today?



Submit info to access your funds

To continue having access to your funds, you need to submit the info requested.



Ship your 30 new orders

Print labels and schedule pick-up for new orders.

PayPal balance

\$128,711.90 USD

Available

Transfer Money

Auto transfers daily

Change



As part of our period financial status of yo

See details



From 08/01/2023, u currencies that you c continue with norma

Thank you,

Max

Max Leadbeatter
FSS Cash Manager

E max.leadbeatter@thebodyshop.com | T +44(0)1903 644790 | Ext: 4790

The Body Shop International | Watersmead Business Park | Littlehampton | West Sussex | BN17 6LS

Working hours:

Monday, Wednesday and Friday 09:00-1700

Tuesday and Thursday 08:00-16:00



The EU animal testing ban is under threat. Sign here to stand with us against animal testing.

The Body Shop International Limited (In Administration) Following the making of the Administration Order on 13 February 2024, the affairs, business and property of the Company are being managed by the appointed Joint Administrators, Anthony John Wright, Alistair Rex Massey and Geoffrey Paul Rowley. The Joint Administrators act as agents of the Company and without personal liability.

Courtney M. Roman

From: Situn Mohanty <simohanty@paypal.com>
Sent: Thursday, April 18, 2024 12:27 AM
To: Courtney M. Roman
Cc: Brian Powers; Lynne M. Manzollilo, PHR, SHRM-CP; Kenneth P. Silverman
Subject: RE: Buth-Na-Bodhaige Inc. d/b/a The Body Shop - Case No. 24-10392-DSJ - SDNY

Follow Up Flag: Follow up
Flag Status: Completed

Hi Courtney,

Thanks for the information.

I am just wondering; can you not withdraw the balance directly from merchant's account.

As per our process, we open the withdraw option in your account with us and release the first tranche.

Please let me know if this is possible.

Thanks,
Situn

From: Courtney M. Roman <courtney.roman@rimonlaw.com>
Sent: Wednesday, April 17, 2024 9:50 PM
To: Situn Mohanty <simohanty@paypal.com>
Cc: Brian Powers <brian.powers@rimonlaw.com>; Lynne M. Manzollilo, PHR, SHRM-CP <lynne.manzollilo@rimonlaw.com>; Kenneth P. Silverman <kenneth.silverman@rimonlaw.com>
Subject: RE: Buth-Na-Bodhaige Inc. d/b/a The Body Shop - Case No. 24-10392-DSJ - SDNY

This message has links and attachments, please check both carefully before opening.

Hi Situn,

Please see the attached wiring instructions.

Best,
Courtney

Courtney M. Roman | Associate

RIMÓN PC

+1 516.479.6346 | courtney.roman@rimonlaw.com
100 Jericho Quadrangle Suite 300, Jericho, NY 11753

www.rimonlaw.com | [See Our International Offices](#) | [Read Our Insights](#)

[Connect on LinkedIn](#) | [Like us on Facebook](#)

This e-mail is sent by a law firm and contains information that may be confidential or privileged. If you have received this communication in error, please reply to the sender (only) and then please delete this message from your inbox as well as any copies. Thank you.

From: Courtney M. Roman <courtney.roman@rimonlaw.com>

Sent: Tuesday, April 16, 2024 9:30 AM

To: Situn Mohanty <simohanty@paypal.com>; Brian Powers <brian.powers@rimonlaw.com>; Lynne M. Manzolillo, PHR, SHRM-CP <lynne.manzolillo@rimonlaw.com>; Kenneth P. Silverman <kenneth.silverman@rimonlaw.com>

Subject: RE: Buth-Na-Bodhaige Inc. d/b/a The Body Shop - Case No. 24-10392-DSJ - SDNY

Hi Situn,

Thank you. The below plan is acceptable to the Trustee. Lynne will provide you with payment information tomorrow when she gets back.

Best,
Courtney

Courtney M. Roman | Associate

RIMON PC

+1 516.479.6346 | courtney.roman@rimonlaw.com
100 Jericho Quadrangle Suite 300, Jericho, NY 11753

www.rimonlaw.com | [See Our International Offices](#) | [Read Our Insights](#)

[Connect on LinkedIn](#) | [Like us on Facebook](#)

This e-mail is sent by a law firm and contains information that may be confidential or privileged. If you have received this communication in error, please reply to the sender (only) and then please delete this message from your inbox as well as any copies. Thank you.

From: Situn Mohanty <simohanty@paypal.com>

Sent: Monday, April 15, 2024 6:35 AM

To: Lynne M. Manzolillo, PHR, SHRM-CP <lynne.manzolillo@rimonlaw.com>; Max Leadbeatter <Max.Leadbeatter@thebodyshop.com>

Cc: Brian Powers <brian.powers@rimonlaw.com>; Kenneth P. Silverman <kenneth.silverman@rimonlaw.com>; Courtney M. Roman <courtney.roman@rimonlaw.com>; Lynne M_ Manzolillo's Personal Workspace LMM's Emails <{F787608}.Rimon@rimon.imanage.work>

Subject: RE: Buth-Na-Bodhaige Inc. d/b/a The Body Shop - Case No. 24-10392-DSJ - SDNY [IMAN-RIMON.FID787608]

++@Max Leadbeatter

From: Situn Mohanty <simohanty@paypal.com>

Sent: Monday, April 15, 2024 4:02 PM

To: Lynne M. Manzolillo, PHR, SHRM-CP <lynne.manzolillo@rimonlaw.com>

Cc: Brian Powers <brian.powers@rimonlaw.com>; Kenneth P. Silverman <kenneth.silverman@rimonlaw.com>; Courtney M. Roman <courtney.roman@rimonlaw.com>; Lynne M_ Manzolillo's Personal Workspace LMM's Emails <{F787608}.Rimon@rimon.imanage.work>; global-hrsc <global-hrsc@paypal.com>

Subject: FW: Buth-Na-Bodhaige Inc. d/b/a The Body Shop - Case No. 24-10392-DSJ - SDNY [IMAN-RIMON.FID787608]

Hi Lynne,

Hope you are doing well.

With respect to the release of the available funds balance in your account, we propose the below plan.

| Date of Release | Account Balance (USD) | Release Amount (USD)* | Remaining Balance (USD) |
|-----------------|-----------------------|-----------------------|-------------------------|
|-----------------|-----------------------|-----------------------|-------------------------|

| | | | |
|-----------|-----------|-----------|----------|
| 15-Apr-24 | \$128,000 | \$100,000 | \$28,000 |
| 31-May-24 | \$28,000 | \$20,000 | \$8,000 |
| 29-Aug-24 | \$8,000 | \$8,000 | \$- |

* Release of reserve amount is subjected to the following criteria:

- No changes observed on incoming Chargeback and Claims trend
- Meeting the requirement for 'Remaining Balance'. Release amount could be lesser depending on the incoming CB & BC , which will reduce the 'Remaining Balance'.

* Final release on T+180 days:

- No open cases in Service Log
- No NB on all accounts

(T: Last date of your processing was on is 2nd Mar'24). We usually hold funds for 6 months from the last date of processing and not insolvency filing date.

Request you to please **acknowledge** the above plan directly on the Email ID: global-hrsc@paypal.com

Let me know if you have any questions.

Thanks, and Regards,

Situn Mohanty

Senior Underwriter

EMEA HRSC



From: Situn Mohanty <simohanty@paypal.com>

Sent: Wednesday, April 10, 2024 1:58 PM

To: Lynne M. Manzolillo, PHR, SHRM-CP <lynne.manzolillo@rimonlaw.com>

Cc: Brian Powers <brian.powers@rimonlaw.com>; Kenneth P. Silverman <kenneth.silverman@rimonlaw.com>; Courtney M. Roman <courtney.roman@rimonlaw.com>; Lynne M_ Manzolillo's Personal Workspace LMM's Emails <F787608.Rimon@rimon.imanage.work>; global-hrsc <global-hrsc@paypal.com>

Subject: RE: Buth-Na-Bodhaige Inc. d/b/a The Body Shop - Case No. 24-10392-DSJ - SDNY [IMAN-RIMON.FID787608]

Hi Lynne,

Thanks for reaching out.

For the US account, since it has stopped processing and we observe no incoming cases, we shall prepare a Fund release plan and update you soon.

Please, let me know if you have any questions.

Thanks,

Situn

From: Lynne M. Manzolillo, PHR, SHRM-CP <lynne.manzolillo@rimonlaw.com>

Sent: Tuesday, April 9, 2024 12:07 AM

To: Situn Mohanty <simohanty@paypal.com>

Cc: Brian Powers <brian.powers@rimonlaw.com>; Kenneth P. Silverman <kenneth.silverman@rimonlaw.com>; Courtney

M. Roman <courtney.roman@rimonlaw.com>; Lynne M_ Manzolillo's Personal Workspace LMM's Emails
<{F787608}.Rimon@rimon.imanage.work>

Subject: Buth-Na-Bodhaige Inc. d/b/a The Body Shop - Case No. 24-10392-DSJ - SDNY [IMAN-RIMON.FID787608]
Importance: High

This message has links and attachments, please check both carefully before opening.

Dear Mr. Mohanty,

I am the Paralegal to Kenneth P. Silverman, Esq., in his capacity as the Chapter 7 Trustee of Buth-Na-Bodhaige d/b/a The Body Shop (the "Debtor"), and his counsel, Brian Powers, Esq.

Per your email correspondence below with Max Leadbetter, PayPal was holding \$128,711.90 of the Debtor's funds as of March 26, 2024. Please advise what you require from the Trustee to have the proceeds of the Debtor's PayPal account turned over to the bankruptcy estate.

Kindly contact me directly at 516.479.6316 or via email so that we can effectuate the turnover of these funds into the Trustee's estate bank account in this matter.

Thank you,
Lynne Manzolillo

Lynne M. Manzolillo, PHR, SHRM-CP | Paralegal

RIMON PC

+1 516.479.6316 | lynne.manzolillo@rimonlaw.com
100 Jericho Quadrangle Suite 300, Jericho, NY 11753

www.rimonlaw.com | [See Our International Offices](#) | [Read Our Insights](#)

[Connect on LinkedIn](#) | [Like us on Facebook](#)

This e-mail is sent by a law firm and contains information that may be confidential or privileged. If you have received this communication in error, please reply to the sender (only) and then please delete this message from your inbox as well as any copies. Thank you.

From: Max Leadbetter

Sent: Tuesday, March 26, 2024 10:11 AM

To: Situn Mohanty <simohanty@paypal.com>

Cc: global-hrsc <global-hrsc@paypal.com>; Joanne Wilson <Joanne.Wilson@thebodyshop.com>; Paulo Amorim <Paulo.Amorim@thebodyshop.com>; Andrew McCrea <Andrew.McCrea@thebodyshop.com>

Subject: RE: THE BODY SHOP INTERNATIONAL

Hi Situn,

Our USA paypal account has this balance sitting in it and has not paid out since middle of Feb?

Please can you confirm why this is and how we get it released?



Summary

Money

Activity

Reports ▾

Tools ▾

More ▾

Help

Hi Max, Welcome back

What do you want to get done today?



Submit info to access your funds

To continue having access to your funds, you need to submit the info requested.



Ship your 30 new orders

Print labels and schedule pick-up for new orders.

PayPal balance



\$128,711.90 USD

Available

Transfer Money ▾



Auto transfers daily

Change



As part of our period financial status of yo

See details



From 08/01/2023, u currencies that you c continue with norma

Thank you,

Max

Max Leadbeatter
FSS Cash Manager

E max.leadbeatter@thebodyshop.com | T +44(0)1903 644790 | Ext: 4790

The Body Shop International | Watersmead Business Park | Littlehampton | West Sussex | BN17 6LS

Working hours:

Monday, Wednesday and Friday 09:00-1700

Tuesday and Thursday 08:00-16:00



The EU animal testing ban is under threat. Sign here to stand with us against animal testing.

The Body Shop International Limited (In Administration) Following the making of the Administration Order on 13 February 2024, the affairs, business and property of the Company are being managed by the appointed Joint Administrators, Anthony John Wright, Alistair Rex Massey and Geoffrey Paul Rowley. The Joint Administrators act as agents of the Company and without personal liability.

Linda S. Tumino

From: Situn Mohanty <simohanty@paypal.com>
Sent: Friday, June 28, 2024 8:07 AM
To: Lynne M. Manzolillo, PHR, SHRM-CP; global-hrsc
Cc: Kenneth P. Silverman; Brian Powers; Courtney M. Roman; Brian@rynikerllc.com; patrick@rkc.llc; Linda S. Tumino; KPS_Trustee_KPS_ Buth_Na_Bodhaige_Inc_d_b_a The Body Shop_13637_61845_Correspondence
Subject: RE: Buth-Na-Bodhaige Inc. d/b/a The Body Shop - Case No. 24-10392-DSJ - SDNY [IMAN-RIMON.FID945877]

Hi Lynne,

Can you connect with the Customer Solutions team on the below:
[PayPal Contact Us](#) | [PayPal US](#)

Not sure if you have already reached out to them.

If you can log in to the merchant's PP account, you can manually add the new account details.

Thanks,
Situn

From: Lynne M. Manzolillo, PHR, SHRM-CP <lynne.manzolillo@rimonlaw.com>
Sent: Friday, June 28, 2024 4:24 PM
To: Situn Mohanty <simohanty@paypal.com>; global-hrsc <global-hrsc@paypal.com>
Cc: Kenneth P. Silverman <kenneth.silverman@rimonlaw.com>; Brian Powers <brian.powers@rimonlaw.com>; Courtney M. Roman <courtney.roman@rimonlaw.com>; Brian@rynikerllc.com; patrick@rkc.llc; Linda S. Tumino <linda.tumino@rimonlaw.com>; KPS_Trustee_KPS_ Buth_Na_Bodhaige_Inc_d_b_a The Body Shop_13637_61845_Correspondence <{F945877}.Rimon@rimon.imanage.work>
Subject: RE: Buth-Na-Bodhaige Inc. d/b/a The Body Shop - Case No. 24-10392-DSJ - SDNY [IMAN-RIMON.FID945877]

This message has links and attachments, please check both carefully before opening.

Thank you Situn.

Can you please provide me with the contact information for someone with authority on the team you are forwarding this on to so I can follow up with them directly?

Best,
Lynne

Lynne M. Manzolillo, PHR, SHRM-CP | Paralegal
RIMON PC
+1 516.479.6316 | lynne.manzolillo@rimonlaw.com
100 Jericho Quadrangle Suite 300, Jericho, NY 11753

www.rimonlaw.com | [See Our International Offices](#) | [Read Our Insights](#)

[Connect on LinkedIn](#) | [Like us on Facebook](#)

This e-mail is sent by a law firm and contains information that may be confidential or privileged. If you have received this communication in error, please reply to the sender (only) and then please delete this message from your inbox as well as any copies. Thank you.

From: Situn Mohanty <simohanty@paypal.com>

Sent: Friday, June 28, 2024 12:06 AM

To: Lynne M. Manzolillo, PHR, SHRM-CP <lynne.manzolillo@rimonlaw.com>; global-hrsc <global-hrsc@paypal.com>

Cc: Kenneth P. Silverman <kenneth.silverman@rimonlaw.com>; Brian Powers <brian.powers@rimonlaw.com>; Courtney M. Roman <courtney.roman@rimonlaw.com>; Brian@rynikerllc.com; patrick@rkc.llc; Linda S. Tumino <linda.tumino@rimonlaw.com>; KPS_Trustee_KPS__Buth_Na_Bodhaige_Inc_d_b_a The Body Shop_13637_61845_Correspondence <{F945877}.Rimon@rimon.imanage.work>

Subject: RE: Buth-Na-Bodhaige Inc. d/b/a The Body Shop - Case No. 24-10392-DSJ - SDNY [IMAN-RIMON.FID945877]

Hi Lynne,

Hope you are doing well.

I understand this has been due for a long time. My apologies.

This is not something which our team handles so I am reaching out to other teams to coordinate.

I have sent a reminder to them again today. As soon as I receive any update shall convey you.

Hoping this to be resolved soon.

Thanks,
Situn

From: Lynne M. Manzolillo, PHR, SHRM-CP <lynne.manzolillo@rimonlaw.com>

Sent: Thursday, June 27, 2024 11:48 PM

To: Situn Mohanty simohanty@paypal.com; global-hrsc global-hrsc@paypal.com

Cc: Kenneth P. Silverman <kenneth.silverman@rimonlaw.com>; Brian Powers <brian.powers@rimonlaw.com>; Courtney M. Roman <courtney.roman@rimonlaw.com>; Brian@rynikerllc.com; patrick@rkc.llc; Linda S. Tumino <linda.tumino@rimonlaw.com>; KPS_Trustee_KPS__Buth_Na_Bodhaige_Inc_d_b_a The Body Shop_13637_61845_Correspondence <{F945877}.Rimon@rimon.imanage.work>

Subject: RE: Buth-Na-Bodhaige Inc. d/b/a The Body Shop - Case No. 24-10392-DSJ - SDNY [IMAN-RIMON.FID945877]

This message has links and attachments, please check both carefully before opening.

Situn,

As a follow up to my email below, attached is another copy of our wiring instructions for your ease in making payment.

Best regards,
Lynne Manzolillo

Lynne M. Manzolillo, PHR, SHRM-CP | Paralegal

RIMON PC

+1 516 479 8318 | lynne.manzolillo@rimonlaw.com
100 Jericho Quadrangle Suite 300, Jericho, NY 11753

www.rimonlaw.com | [See Our International Offices](#) | [Read Our Insights](#)

[Connect on LinkedIn](#) | [Like us on Facebook](#)

This e-mail is sent by a law firm and contains information that may be confidential or privileged. If you have received this communication in error, please reply to the sender (only) and then please delete this message from your inbox as well as any copies. Thank you.

From: Lynne M. Manzolillo, PHR, SHRM-CP

Sent: Thursday, June 27, 2024 1:56 PM

To: Situn Mohanty <simohanty@paypal.com>; global-hrsc <global-hrsc@paypal.com>

Cc: Kenneth P. Silverman <kenneth.silverman@rimonlaw.com>; Brian Powers <brian.powers@rimonlaw.com>; Courtney M. Roman <courtney.roman@rimonlaw.com>; Brian@rynikerllc.com; patrick@rkc.llc; Linda S. Tumino <linda.tumino@rimonlaw.com>; KPS_Trustee_KPS_ Buth_Na_Bodhaige_Inc_d_b_a The Body Shop_13637_61845_Correspondence <{F945877}.Rimon@rimon.imanage.work>

Subject: FW: Buth-Na-Bodhaige Inc. d/b/a The Body Shop - Case No. 24-10392-DSJ - SDNY [IMAN-RIMON.FID945877]

Importance: High

Good afternoon, Situn, I hope this email finds you well.

As you know, PayPal is holding bankruptcy estate funds for Buth-Na-Bodhaige Inc., and we have been trying since early March to have these funds returned to the Bankruptcy Trustee.

As you advised, we were to receive the turnover of the PayPal proceeds of \$128,000.00 in tranche payments that were due to be released by PayPal in three parts on April 15, 2024, May 31, 2024, and August 29, 2024, respectively.

| Date of Release | Account Balance (USD) | Release Amount (USD)* | Remaining Balance (USD) |
|-----------------|-----------------------|-----------------------|-------------------------|
| 15-Apr-24 | \$128,000 | \$100,000 | \$28,000 |
| 31-May-24 | \$28,000 | \$20,000 | \$8,000 |
| 29-Aug-24 | \$8,000 | \$8,000 | \$- |

To date, we have not received any of these funds.

As you may recall, you and I agreed that PayPal was going to wire funds into the Trustee's bank account, or in the alternative, have PayPal add the account as an auto pay in your system. Once this was agreed upon, we learned that PayPal returned the money to a closed HSBC account, and since then, the money has been returned and is currently in the Debtor's PayPal account. Kindly see the email trail below.

At this time, we have supplied you with the Trustee's wire instructions and we would like to have the money turned over to the Trustee by close of business next Friday, July 5, 2024. In the alternative, the Trustee will be forced to file a motion with the United States Bankruptcy Court seeking a return of property of the estate from PayPal.

Please have your team member advise if you require anything further from us.

I can be reached directly in the office at 516-479-6316, on my mobile number (516-998-5872), or via email to lynne.manzolillo@rimonlaw.com. Please also copy my colleague, Linda Tumino, at linda.tumino@rimonlaw.com on any communication in response to this matter.

Thank you, and best regards,

Lynne Manzolillo

Lynne M. Manzolillo, PHR, SHRM-CP | Paralegal

RIMON PC

+1 516.479.6316 | lynne.manzolillo@rimonlaw.com

100 Jericho Quadrangle Suite 300, Jericho, NY 11753

www.rimonlaw.com | [See Our International Offices](#) | [Read Our Insights](#)

[Connect on LinkedIn](#) | [Like us on Facebook](#)

This e-mail is sent by a law firm and contains information that may be confidential or privileged. If you have received this communication in error, please reply to the sender (only) and then please delete this message from your inbox as well as any copies. Thank you.

From: Situn Mohanty <simohanty@paypal.com>

Sent: Tuesday, May 7, 2024 5:23 AM

To: Lynne M. Manzolillo, PHR, SHRM-CP <lynne.manzolillo@rimonlaw.com>; Max Leadbeatter <Max.Leadbeatter@thebodyshop.com>

Cc: Kenneth P. Silverman <kenneth.silverman@rimonlaw.com>; Brian Powers <brian.powers@rimonlaw.com>; Courtney M. Roman <courtney.roman@rimonlaw.com>; KPS_ Trustee _KPS_ _ Buth_Na_Bodhaige_ Inc_ d_b_a The Body Shop _13637_61845_ Correspondence <{F945877}.Rimon@rimon.imanage.work>

Subject: RE: Buth-Na-Bodhaige Inc. d/b/a The Body Shop - Case No. 24-10392-DSJ - SDNY [IMAN-RIMON.FID945877]

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Max/Lynne,

To keep you posted, we are working with the Payments and recovery team to transfer the funds per the wired instructions.

Just wanted to know, if you could anyway work with the HSBC bank to get your funds back.

Thanks,

Situn

From: Situn Mohanty <simohanty@paypal.com>
Sent: Monday, April 29, 2024 7:07 PM
To: Lynne M. Manzollilo, PHR, SHRM-CP <lynne.manzollilo@rimonlaw.com>; Max Leadbeatter <Max.Leadbeatter@thebodyshop.com>
Cc: Kenneth P. Silverman <kenneth.silverman@rimonlaw.com>; Brian Powers <brian.powers@rimonlaw.com>; Courtney M. Roman <courtney.roman@rimonlaw.com>; KPS_Trustee_KPS__Buth_Na_Bodhaige_Inc_d_b_a The Body Shop _13637_61845_Correspondence <{F945877}.Rimon@rimon.imanage.work>
Subject: RE: Buth-Na-Bodhaige Inc. d/b/a The Body Shop - Case No. 24-10392-DSJ - SDNY [IMAN-RIMON.FID945877]

Hi All,

We are currently working on this.

As soon as I receive an update from the team, will convey you.

Thanks,

Situn

From: Lynne M. Manzollilo, PHR, SHRM-CP <lynne.manzollilo@rimonlaw.com>
Sent: Monday, April 29, 2024 5:31 PM
To: Situn Mohanty <simohanty@paypal.com>; Max Leadbeatter <Max.Leadbeatter@thebodyshop.com>
Cc: Kenneth P. Silverman <kenneth.silverman@rimonlaw.com>; Brian Powers <brian.powers@rimonlaw.com>; Courtney M. Roman <courtney.roman@rimonlaw.com>; KPS_Trustee_KPS__Buth_Na_Bodhaige_Inc_d_b_a The Body Shop _13637_61845_Correspondence <{F945877}.Rimon@rimon.imanage.work>
Subject: RE: Buth-Na-Bodhaige Inc. d/b/a The Body Shop - Case No. 24-10392-DSJ - SDNY [IMAN-RIMON.FID945877]
Importance: High

This message has links and attachments, please check both carefully before opening.

Situn and Max,

We did not make any withdrawal nor have we had the ability to get into or view the account. Please review and get back to us as soon as possible today.

Lynne

Lynne M. Manzolillo, PHR, SHRM-CP | Paralegal

RIMON PC

+1 516 479 6316 | lynne.manzolillo@rimonlaw.com

100 Jericho Quadrangle Suite 300, Jericho, NY 11753

www.rimonlaw.com | [See Our International Offices](#) | [Read Our Insights](#)

[Connect on LinkedIn](#) | [Like us on Facebook](#)

This e-mail is sent by a law firm and contains information that may be confidential or privileged. If you have received this communication in error, please reply to the sender (only) and then please delete this message from your inbox as well as any copies. Thank you.

From: Situn Mohanty <simohanty@paypal.com>

Sent: Monday, April 29, 2024 6:08 AM

To: Max Leadbeatter <Max.Leadbeatter@thebodyshop.com>; Lynne M. Manzolillo, PHR, SHRM-CP
<lynne.manzolillo@rimonlaw.com>

Subject: RE: Buth-Na-Bodhaige Inc. d/b/a The Body Shop - Case No. 24-10392-DSJ - SDNY [IMAN-RIMON.FID945877]

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Max,

I am checking internally with the recovery team.

Please give me some time, I will come back to you with updates.

Thanks,

Situn

From: Max Leadbeatter <Max.Leadbeatter@thebodyshop.com>

Sent: Monday, April 29, 2024 2:53 PM

To: Situn Mohanty <simohanty@paypal.com>; Lynne M. Manzolillo, PHR, SHRM-CP <lynne.manzolillo@rimonlaw.com>

Subject: RE: Buth-Na-Bodhaige Inc. d/b/a The Body Shop - Case No. 24-10392-DSJ - SDNY [IMAN-RIMON.FID945877]

This message has links and attachments, please check both carefully before opening.

Hi Situn,

I have not made any withdrawal.

However the account was set up to auto pay – trouble is if it has paid out to a closed bank account what happens then?

Thank you,

Max

Max Leadbeatter

FSS Cash Manager

E max.leadbeatter@thebodyshop.com | **T** +44(0)1903 644790 | **Ext:** 4790

The Body Shop International | Watersmead Business Park | Littlehampton | West Sussex | BN17 6LS

Working hours:

Monday, Wednesday and Friday 09:00-1700

Tuesday and Thursday 08:00-16:00