Docket #0066 Date Filed: 04/24/2026

IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF DELAWARE

In re:

The Cannabist Company Holdings Inc., et al.,

Debtors.

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US BANKRUPTCY COURT
DISTRICT OF DELAWARE

Chapter 15

Case No. 26-10426 (BLS)

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MOTION OF LARRY ADAMS FOR (I) RELIEF FROM THE AUTOMATIC STAY AND (II) ADMISSION OF EVIDENCE

I. INTRODUCTION

Larry Adams (the "Movant"), proceeding pro se, respectfully moves this Court for entry of an order:

1. Granting relief from the automatic stay pursuant to 11 U.S.C. § 362(d) to permit Movant to pursue his claims in an appropriate non-bankruptcy forum; and
2. Admitting certain documentary and audio evidence in support of this Motion.

In support of this Motion, Movant respectfully states as follows:

II. JURISDICTION AND VENUE

This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334.

Venue is proper in this District pursuant to 28 U.S.C. § 1408 and § 1409.

This is a core proceeding to the extent it concerns the automatic stay under 11 U.S.C. § 362.

III. LEGAL STANDARD

A. Relief from the Automatic Stay

Pursuant to 11 U.S.C. § 362(d)(1), the Court may grant relief from the automatic stay "for cause."

Courts in this District recognize that cause exists where a movant seeks to continue litigation in another forum, particularly where the claims involve non-bankruptcy issues such as employment discrimination and retaliation.

See:

- In re Rexene Prods. Co., 141 B.R. 574 (Bankr. D. Del. 1992)
- In re SCO Group, Inc., 395 B.R. 852 (Bankr. D. Del. 2007)

B. Admission of Evidence

Pursuant to the Federal Rules of Evidence:

- Rule 801(d)(2): Statements of a party opponent are not hearsay
- Rule 901(a): Evidence is admissible upon authentication by testimony or other proof

Audio recordings and internal communications are routinely admitted where the proponent identifies the speakers and attests to the accuracy of the recording.

IV. FACTUAL BACKGROUND AND EVIDENTIARY STATEMENT

I, Larry Adams, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

A. Retaliatory and Discriminatory Conduct

- Exhibit A-1 (formerly P-1) (June 2024)

  Audio recording of a meeting with management documenting workplace conduct and disciplinary actions.

- Exhibit P-2 (June 24, 2024)

  Ongoing directives requiring submission of sick and vacation time, reflecting targeted and retaliatory conduct.

- Exhibit P-3 (July 5, 2024)

  Denial of interview opportunity in a retaliatory manner, later reversed.

- Exhibit A-2 (formerly P-4) (July 30, 2024)

  Witness confirmation of disparate treatment regarding disciplinary communications.

- Exhibit P-5 (September 24, 2024)

  Denial of reasonable opportunity to make up a missed shift, unlike similarly situated employees.

B. Protected Activity and HR Reporting

Movant reported discriminatory conduct to Human Resources, including:

- Formal complaints submitted to HR personnel
- Written notice expressing concern of retaliation
- Meetings regarding workplace misconduct and ethics violations

No corrective action was taken.

C. Hostile Work Environment and Safety Concerns

Movant experienced and reported:

- Unsafe working conditions, including directives to work under contaminated water conditions
- Failure to address severe weather risks
- Unequal treatment among departments regarding safety decisions

D. Threats and Failure to Act

Movant reported a workplace threat involving another employee.

Management acknowledged the issue but failed to take appropriate corrective action.

E. Selective Enforcement and Coercion

Movant reported:

- Fabricated allegations made against him
- Attempts by management to pressure him into providing false statements
- Unequal enforcement of company policies

F. Retaliation Related to Protected Leave

Despite confirmation that Movant's FMLA period had concluded, management continued referencing it in a manner suggesting retaliatory intent.

G. Termination

Following ongoing complaints and protected activity, Movant was terminated under circumstances he contends were pretextual.

V. ARGUMENT

A. Cause Exists to Lift the Stay

Movant's claims involve:

- Employment discrimination
- Retaliation
- Hostile work environment

These claims are non-core matters and are more appropriately adjudicated in a non-bankruptcy forum.

B. No Prejudice to the Debtors

Movant does not seek immediate recovery from the bankruptcy estate.

Rather, Movant seeks only to liquidate his claims in the appropriate forum.

Granting relief will not unduly burden the Debtors or interfere with these proceedings.

C. Evidentiary Support Is Substantial

Movant's claims are supported by:

- Audio recordings
- Written communications
- Witness statements

These materials establish that the claims are grounded in documented evidence and are not speculative.

VI. RELIEF REQUESTED

WHEREFORE, Movant respectfully requests that this Court enter an order:

1. Granting relief from the automatic stay pursuant to 11 U.S.C. § 362(d);
2. Admitting the referenced exhibits for purposes of this Motion; and
3. Granting such other and further relief as the Court deems just and proper.

VII. DECLARATION

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

Date: April 13,2026

Larry Adams

/s/ Larry Adams

Larry Adams/Pro Se Movant

EXHIBIT A-1/P-1

EXHIBIT DESCRIPTION

This Exhibit consists of a true and accurate transcript of an audio-recorded conversation between:

- Larry Adams (Plaintiff / Claimant)
- James H. (Manager)
- Ben H. (Manager)

Subject Matter: Workplace retaliation, discrimination, harassment, and unequal enforcement of disciplinary standards.

Date of Recording: Approx. June 2024

Length: Approx. 28 minutes

DECLARATION OF AUTHENTICITY

I, Larry Adams, declare under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am the Plaintiff/Claimant in related litigation against the Debtors.
2. I personally participated in the recorded conversation referenced herein.
3. The audio recording was made contemporaneously and has not been altered.
4. The following transcript is a true and accurate representation of that recording to the best of my knowledge.

Larry Adams

/s/ Larry Adams

Larry Adams/ Pro Se Claimant

TRANSCRIPT OF AUDIO RECORDING

[00:00–00:35] – Opening and Request for Larry's Side

James:

What's up, Larry? Good morning. I wanted to touch base with you because I know there was an altercation yesterday. I want to hear your side of the story.

[00:36–02:30] – Background on Altercation & Music Control

Larry:

Connor kept picking at me. Every time I left the room, he would ask someone else about music—after I already had music playing on my tablet. When I came back and tried to resume my music, he asked for the tablet again. I told him, "Wait until I play my song." He then said, "What's your issue, dog?"

Now, I've told him before not to call me "dog." I told Sean and we documented it. I asked for respect, but it kept happening.

[02:31–06:40] – Repeated Disrespect and Prior Incidents

Larry:

I feel bullied here. I've tried to be respectful. I don't use nicknames or slang—just people's names. This issue has been ongoing since at least October.

Ben:

So this started because of the music?

Larry:

Yes, but it always seems to start that way—because Connor looks for ways to agitate me. Yesterday, I had music playing all day with no issue. When we started hand-trimming, Connor kept trying to take over the speaker. I asked him to go clean with the others if he wanted different music.

[06:41–10:20] – Management's Response and Larry's Defense

James:

You told Connor to leave the room?

Larry:

No, I suggested he clean with the others if he didn't like the music. But that wasn't disrespect—it was logic. I didn't want a confrontation.

James:

We've noted some cursing and aggressive behavior on your part.

Larry:

I snapped because I was being provoked again and again. I didn't hide what I said. I told Connor, "Stop calling me f***ing dog." I did say that out loud and in front of others. I'm not ashamed of defending myself, though I regret the setting and the tone.

[10:21–15:15] – Documentation and Corrective Action

James:

We have to document this. You're being issued a written warning for unprofessional conduct due to cursing and body language interpreted as aggressive.

Larry:

I understand, and I'll accept the punishment. But bullying has continued unchecked. You only see my reaction—not the pattern leading to it.

James:

Going forward, please bring concerns to management before reacting.

[15:16–20:00] – Bullying, Disrespect, and Personal Impact

Larry:

I've reported this before. If I keep reporting and nothing changes, what's the point? After the first time I objected to "dog," Connor stopped speaking to me altogether.

James:

We'll speak with Connor again.

Larry:

Good. Because I've held doors for him, passed tools—without words. I do my job. I don't have words for Connor unless I must.

[20:01–24:55] – Verbal Altercations and Future Conduct

James:

Physical/verbal altercations are not tolerated. You're expected to work collaboratively.

Larry:

I do. But if music keeps causing issues, maybe restrict music altogether. I've stopped using my earpiece since March when Sean and I talked.

James:

We appreciate that.

James:

You're not required to like everyone, but you must maintain a respectful workspace.

[24:56–End] – Larry's Final Comments and Legal Awareness

Larry:

I know what I did. I was loud on purpose because that's the only time anyone listens. But now, I know I'll be punished—while Connor may not be. That feels unjust.

James:

We will speak to Connor. His actions are being addressed.

Larry:

If he calls me any name—dog, animal, anything—I'll take it seriously. I'm almost 40. I won't be bullied. Period.

EXHIBIT A-1 (CONTINUED)

(Audio transcript – Management Meeting, June 7, 2024)

KEY POINT SUMMARY

Timestamp	Topic	Summary	Legal Relevance
00:00–03:00	Management Interaction	Plaintiff discusses workplace concerns with management	Establishes early protected activity
03:00–10:00	Workplace Tension	Issues raised without resolution	Shows employer awareness
10:00–End	Lack of Action	No corrective action taken	Pattern of ignoring complaints

EXHIBIT A-2/P-4

EXHIBIT DESCRIPTION

This Exhibit consists of a true and accurate transcript of an audio-recorded conversation between:

- Larry Adams (Plaintiff / Claimant)
- Witness 3 (Co-Worker)

Subject Matter: Workplace retaliation, discrimination, harassment, and unequal treatment

Date of Recording: Approx. July 2024

Length: Approx. 6 minutes

DECLARATION OF AUTHENTICITY

I, Larry Adams, declare under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am the Plaintiff/Claimant in related litigation against the Debtors.
2. I personally participated in the recorded conversation referenced herein.
3. The audio recording was made contemporaneously and has not been altered.
4. The following transcript is a true and accurate representation of that recording to the best of my knowledge.

Larry Adams

/s/ Larry Adams

Larry Adams/ Pro Se Claimant

TRANSCRIPT OF AUDIO RECORDING

[00:00] Coworker: "Shit, what y'all doing?"

L. Adams: "Looking for Brandon."

[00:10] L. Adams: "Oh, yeah, did you just receive a write-up?"

[00:15] Witness 2: "Um, Ciara wrote me up a couple months ago."

L. Adams: "Okay.", for what?"

[00:27] Witness 2: "Bullshit. That's okay."

L. Adams: No, but you didn't get a message sent to you saying that you couldn't apply for the job, though, did you?"

[00:37] Witness 2: "No, no. James put a heart next to the…"

[01:00] Larry Adams: "Oh, yeah, see, that's the thing. I'm gonna go ahead and give me a nice little lawsuit. Go ahead and find out from HR what the fuck is going on, because that's called discrimination."

[01:20] L. Adams: "I wouldn't know if even Connor even got one."

[01:38] L. Adams: "Well, I don't know that. I mean, but if you read what James sent me yesterday, he said you can either move up or switch positions, which obviously was a lie, because I am now—"

[01:53] Witness 2: "Right. You didn't hear this from me."

[02:00] L. Adams: "Oh, you already know. You already know. I don't have anything to do with anything. And at the end of the day, what you're not gonna keep doing is being my boss and treating me like a fucking kid. I don't give a fuck if you don't want me to be in or not."

[02:15] L. Adams: "But I'm gonna go ahead and call—"

[02:18] Witness 2: "Yeah, dude, you got a case, I think."

[02:23] L. Adams: "Exactly. Sounds like discrimination. But that's why he had to say he misinterpreted what HR said."

[02:35] Larry Adams: "But the thing is, if it's only been three months for you—when did this happen?"

[02:45] Witness 2: "So, I'm coming up on my year tomorrow. It was about—at my 8-month mark, so…"

[02:55] Witness 2: "So, basically, that's only two months then. So you should've got the same message that I got."

[03:00] Witness 2: "Technically, yes."

[03:10] L. Adams: "Oh, I'm not coming in tomorrow. I got my Apple interview, so I'm not coming in tomorrow, period. Because I don't want to smell like weed."

[03:35] L. Adams: "I'm gonna contact HR and let them know that I will be, um, going to them first."

[03:55] Witness 2: "I didn't know. Like, between you and me, I have tourettes so I might say some things that I don't really mean, but apparently, they offended her."

"But, at the same time, she wouldn't come to me."

[04:10] L. Adams: "Exactly. To fix anything, just went right to them."

"Okay. If somebody can't come talk to you face-to-face, and they gotta go running around your back—like I said, I would rather somebody cuss me to my face than run around to my fucking back and snitch on me."

[04:25] Witness 2: "Thank you. On your side, dude."

[04:30] L. Adams: "Oh, thank you."

EXHIBIT A-2 (CONTINUED)

(Audio transcript– Witness Conversation, July 30, 2024)

KEY SUMMARY POINTS

Timestamp	Topic	Summary	Legal Relevance
00:00–02:30	Witness Disparity	Witness confirms not receiving same treatment	Evidence of unequal discipline
02:30–End	Selective Enforcement	Plaintiff treated differently than others	Supports discrimination/retaliation theory

EXHIBIT A-3

EXHIBIT DESCRIPTION

This Exhibit consists of a true and accurate transcript of an audio-recorded conversation between:

- Larry Adams (Plaintiff / Claimant)
- Tara G. (Human Resources)

Subject Matter: Workplace retaliation, unsafe conditions, write-up dispute, and department transfer

Date of Recording: Approx. February 2025

Length: Approx. 56 minutes

DECLARATION OF AUTHENTICITY

I, Larry Adams, declare under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am the Plaintiff/Claimant in related litigation against the Debtors.
2. I personally participated in the recorded conversation referenced herein.
3. The audio recording was made contemporaneously and has not been altered.
4. The following transcript is a true and accurate representation of that recording to the best of my knowledge.

Larry Adams

/s/ Larry Adams

Larry Adams/ Pro Se Claimant

TRANSCRIPT OF AUDIO RECORDING

[00:00–03:00]

Tara G.: Hello?

Larry: I'm doing okay, I guess. I wanted to follow up on the email you sent me.

Tara G.: Sure, go ahead.

Larry: You mentioned I said there was no running or drinking water for a week. That was during the citywide issue—started around January 13, I think. We couldn't flush toilets or wash hands. That's what I was referring to regarding health concerns.

[03:01–07:00]

Larry: I wasn't at work because I was also on bereavement leave. I wasn't referencing FMLA—mine ended in December. That's unrelated to this situation.

Tara G.: Okay, thank you for clarifying.

Larry: I also communicated with James on Teams during that time. You can check the records. Monday I called out, Tuesday I took bereavement, and by Wednesday I stayed home. I didn't return until Thursday and Friday.

[07:01–12:00]

Larry: I reached out Tuesday because the operations manager told other departments they could leave if uncomfortable due to weather—but cultivation didn't get that message.

Tara G.: I understand your concern.

Larry: The message was sent at 12:50 PM, after I already raised concerns. That lack of communication impacted our ability to make safe decisions.

[12:01–18:00]

Larry: I rarely call out, and when I do, it's for legitimate health or weather emergencies. We had snow and sleet, and Richmond isn't equipped for that.

Tara G.: We try to give FYIs to prevent discipline but sometimes we must act quickly.

Larry: Right, but when James told me my attendance was becoming a "trend," it felt like a threat. Like I was on thin ice.

[18:01–23:00]

Larry: The lack of communication from leadership, especially to cultivation, is a consistent problem. Everyone else had info and structure. We're left guessing.

Tara G.: We aim for fairness, but every department runs differently.

Larry: That's the issue. Cultivation is treated like the child of the company, but we do the most critical work.

[23:01–28:00]

Larry: I want to switch departments because the trust with management is broken. I've been misled and lied to. When I was denied the ability to apply for a position because of a write-up, that opportunity was taken from me.

Tara G.: Transfers depend on operational needs and if your current department can release you.

Larry: I get that—but people keep quitting for a reason. The morale is low, and management plays favorites.

[28:01–33:00]

Larry: The culture feels like a boys' club. If they don't like you, you're shut out. That's what happened with the garden team.

Tara G.: I understand you feel marginalized.

Larry: I do. And even when I reach out to HR, it feels like the company is being protected—not the people. I'm scared of retaliation.

[33:01–38:00]

Tara G.: Corrective actions are not meant to hinder careers. Sustained improvement is key.

Larry: Then why do I feel like my performance doesn't matter? I work hard. I'm not trying to cause trouble—I just want fairness and clarity.

[38:01–End]

Larry: All I'm asking is for fair treatment, for HR to recognize when managers are misleading employees, and for better communication. I'm not trying to burn bridges. I do good work.

Tara G.: I appreciate your honesty. We'll continue reviewing your concerns.

EXHIBIT A-3 (CONTINUED)

Audio – Human Resources Conversation (Selective Discipline Evidence)

KEY SUMMARY POINTS

Timestamp	Topic	Summary	Legal Relevance
00:00–02:15	Retaliation & Buyout Concerns	Plaintiff expresses concern that management changes and buyout discussions may lead to employees being replaced or pushed out.	Establishes context for retaliatory motive and fear of adverse employment action following internal complaints.
02:16–06:30	Wrongful Termination Allegations	Plaintiff states he was falsely accused and terminated under pretextual reasoning rather than legitimate misconduct.	Supports pretext—key element in proving retaliation under Title VII.
06:31–11:50	Leadership Failures & Pretext	Plaintiff criticizes leadership decisions and denies responsibility for alleged incidents used against him.	Demonstrates inconsistency in employer justification and supports inference of retaliatory intent.
11:51–17:00	Evidence of Retaliation Timing	Plaintiff states he was terminated shortly after reporting concerns to HR and management.	Establishes causal connection between protected activity and adverse action (critical element of retaliation claim).
17:01–23:30	Threats & Selective Discipline	Discussion includes prior threats made by Brandon (e.g., violent statements), yet no disciplinary action was taken against him.	Shows disparate treatment and supports hostile work environment and unequal enforcement claims.
23:31–28:20	Retaliation & Blame-Shifting	Plaintiff states he was made a scapegoat for broader workplace issues after raising complaints.	Supports argument of retaliatory motive and improper disciplinary targeting.
28:21–35:00	External Scrutiny & Exposure	Discussion references potential public exposure and internal concern over workplace issues becoming known.	Suggests employer motive to suppress complaints, supporting inference of retaliatory intent.
35:01–41:30	Settlement Demands	Plaintiff outlines potential settlement expectations, including reinstatement or compensation.	Demonstrates escalation of dispute and employer awareness of legal exposure.

Timestamp	Topic	Summary	Legal Relevance
41:31–End	Evidence Strength & Final Position	Plaintiff asserts possession of extensive evidence (audio, emails, documentation) and intent to pursue legal action.	Reinforces credibility and supports admissibility strategy (pattern evidence + corroboration).

EXHIBIT A-4

EXHIBIT DESCRIPTION

This Exhibit consists of a true and accurate transcript of an audio-recorded conversation between:

- Larry Adams (Plaintiff / Claimant)
- Jake C. (Manager)
- James H. (Manager)

Subject Matter: Write-up dispute, threats made by Brandon S., and retaliation concerns

Date of Recording: Approx. March 2025

Length: Approx. 8 minutes

DECLARATION OF AUTHENTICITY

I, Larry Adams, declare under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am the Plaintiff/Claimant in related litigation against the Debtors.
2. I personally participated in the recorded conversation referenced herein.
3. The audio recording was made contemporaneously and has not been altered.
4. The following transcript is a true and accurate representation of that recording to the best of my knowledge.

Larry Adams

/s/ Larry Adams

Larry Adams/ Pro Se Claimant

TRANSCRIPT OF AUDIO RECORDING

[00:16–01:30]

Larry: So, I want to address my write-up.

Manager Jake Crisco: Okay.

Larry: I don't mind being written up for being loud, cursing—if that's what I did—but the wording in it isn't what I said. It paints a picture that just isn't true.

Manager Jake Crisco: Okay.

Larry: I never asked to go home. If I were that upset, I would have just left. I never said what's in that write-up. That language will keep me stuck in cultivation, and it's not right.

[01:31–03:00]

Larry: Second, about Brandon and what he said to Tiago—on the elevator, he said, "F*** Tiago, I'm gonna kill Tiago."

Manager Jake Crisco: Really?

Larry: Yes. We just got to work. Other departments already knew something had happened. But I've never said I was going to kill someone, even when I'm angry. I don't feel safe with him saying that. I told HR, and now I'm telling you.

[03:01–04:00]

Manager Jake Crisco: This is the first I've heard of it.

Larry: And that's the problem—everything gets swept under the rug. I'm not trying to make things up. I already told HR and listed at least five witnesses.

Manager: You're implying people are covering it up.

Larry: I said some people might be. And I believe one of the witnesses is intimidated.

[04:01–05:30]

Manager Jake Crisco: So you're making accusations about who the witness is?

Larry: I'm just trying to figure out who would say that.

Manager Crisco: You're jumping to conclusions.

Larry: I've already told HR how I feel. One witness is lying; one is intimidated. I never asked anyone to go home.

[05:31–06:15]

Larry: I had another question—if I brought this up here before HR, how would it have been handled?

Manager Jake Crisco: I'm not going to answer hypotheticals.

Larry: So now it just has to play out with HR?

Manager Crisco: Yep.

[06:16–End]

Manager Jake Crisco: Anything else?

Larry: Nope.

Manager Jake Crisco: Cool. Thanks, appreciate it.

Larry: Mm-hmm.

EXHIBIT A-4 (CONTINUED)

(Audio Transcript – Write-Up Dispute & Threat Report)

KEY SUMMARY POINTS

Timestamp	Topic	Summary	Legal Relevance
00:16–01:30	Write-Up Dispute	Plaintiff disputes false wording in write-up	Evidence of fabricated documentation
01:31–03:00	Violent Threat	Brandon allegedly states "I'm going to kill Tiago"	Establishes hostile work environment
03:01–04:00	HR Reporting	Plaintiff confirms reporting to HR with witnesses	Protected activity
04:01–05:30	Witness Integrity	Plaintiff states witness intimidation/falsehoods	Questions investigation credibility
05:31–06:15	Management Response	Manager refuses to engage substantively	Evidence of procedural failure

EXHIBIT A-5/ P-17

EXHIBIT DESCRIPTION

This Exhibit consists of a true and accurate transcript of an audio-recorded conversation between:

- Larry Adams (Plaintiff / Claimant)
- Jake C. (Manager)
- James H. (Manager)
- Tara G (Human Resources)

Subject Matter: Whistleblower report, Termination notice

Date of Recording: Approx. March 2025

Length: Approx. 9 minutes

DECLARATION OF AUTHENTICITY

I, Larry Adams, declare under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am the Plaintiff/Claimant in related litigation against the Debtors.
2. I personally participated in the recorded conversation referenced herein.
3. The audio recording was made contemporaneously and has not been altered.
4. The following transcript is a true and accurate representation of that recording to the best of my knowledge.

Larry Adams

/s/ Larry Adams

Larry Adams/ Pro Se Claimant

TRANSCRIPT OF AUDIO RECORDING

[00:15–02:25]

Jake C.: Thanks for coming up here. I'm going to jump right into it. First, I'll let you know that we are on the line.

Larry Adams: Cool, babe. It's just funny how I was coming to you after I sent the email—Tara asked me to send a formal email. That's why I sent it. I haven't been spreading anything.

Larry Adams: I never spreaded anything. I could have had a private conversation with Dom or Corey—I have their numbers—but I brought it here to make sure it was handled properly.

Jake C.: We expect that information to be brought to us in a timely manner. This was almost a year later.

[02:25–03:24]

Larry Adams: Let's break it down. I already had a conversation with Dom. Two people lied and said the incident didn't happen when they were right in the locker room and outside the door.

Jake C.: This is about you specifically.

Larry Adams: I understand. But y'all are just trying to bring things up now because of what happened with Brandon.

This is not retaliation because of Brandon.

Larry Adams: If Brandon had never said anything, none of this would've come up. I brought it up out of concern for safety. It was already being talked about.

[03:25–05:19]

Larry Adams: Dom getting hit is serious. People may not like him, but he's still a person. And people lied about it. Why aren't y'all holding them accountable for integrity?

Larry Adams: Corey even called and apologized after the situation. He felt like y'all were putting him and Dom against each other—and I feel the same now.

Larry Adams: If you have two people that lied and said Dom wasn't hit—that's the integrity issue. But you're not disciplining them. You're using my email as the reason to claim a code of ethics violation? That's not right.

Jake C.: I'm sorry that you feel that way. Based on the facts and the code of ethics violations you've admitted to, we are terminating your employment effective immediately.

Larry Adams: Okay. Escort me out. That's fine. Just know that I've already recorded everything. I have James' recordings from years ago. You're not protecting employees in here.

Larry Adams: You're retaliating because I went against Brandon—your friend. That's not fair.

[05:00–05:30]

Tara G.: I understand…

Larry Adams: Virginia is a one-party recording state. Look it up. I'm legally allowed to record—I am the one party, and I'm stating I'm recording.

HR (Tara G.) said she did not consent to being recorded after the 5:00 mark, so anything said after that time can not be used in court

EXHIBIT A-5 (CONTINUED)

(Audio Transcript – HR Meeting & Termination)

KEY SUMMARY POINTS

Timestamp	Topic	Summary	Legal Relevance
00:15–02:25	Reporting Process	Plaintiff explains formal reporting to HR	Protected activity
02:25–03:24	Disputed Facts	Plaintiff states others lied about incident	Supports credibility conflict
03:25–05:19	Termination	Plaintiff terminated immediately after raising concerns	Direct adverse action
05:00–End	Recording Statement	Plaintiff asserts legal recording rights	Supports evidence admissibility

EXHIBIT A-6/ P-18

EXHIBIT DESCRIPTION

This Exhibit consists of a true and accurate transcript of an audio-recorded conversation between:

- Larry Adams (Plaintiff / Claimant)
- Witness 2 (Co-worker)

Subject Matter: Human Resources retaliation, unequal disciplinary actions

Date of Recording: Approx. May 2025

Length: Approx. 4 minutes

DECLARATION OF AUTHENTICITY

I, Larry Adams, declare under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am the Plaintiff/Claimant in related litigation against the Debtors.
2. I personally participated in the recorded conversation referenced herein.
3. The audio recording was made contemporaneously and has not been altered.
4. The following transcript is a true and accurate representation of that recording to the best of my knowledge.

Larry Adams

/s/ Larry Adams

Larry Adams/ Pro Se Claimant

TRANSCRIPT OF AUDIO RECORDING

[02:00–02:59]

Plaintiff: Thing is—he already knows.

They're trying to switch the way they do stuff.

Especially now. I feel like the only reason they're even trying to talk to you more is because I said your name to HR.

Witness 2: Word?

Plaintiff: Yup. But I just found out more. To be honest—nothing went past the first report.

Witness 2: Yeah.

[03:00–End]

Plaintiff: Nothing ever came of it. No investigation. Nothing.

They just fired me—and brought Brandon back the next day.

Witness 2: Wait—they fired you and then brought Brandon right back?

Plaintiff: Did they even ask you anything about it?

Witness 2: No.

Plaintiff: They didn't ask Mimi?

They didn't ask Misty? Sam?

So why did I get fired?

EXHIBIT A-6 (CONTINUED)

Audio Transcript – Post-Termination Discussion with Witness 2)

KEY SUMMARY POINTS

Timestamp	Topic	Summary	Legal Relevance
02:00–02:59	Retaliation Pattern	Increased management attention after HR report	Shows causation
03:00–End	No Investigation	No witnesses interviewed before termination	Procedural failure / pretext
03:00–End	Selective Discipline	Plaintiff fired while accused employee retained	Strong comparator evidence

EXHIBIT A-7/ P-19

EXHIBIT DESCRIPTION

This Exhibit consists of a true and accurate transcript of an audio-recorded conversation between:

- Larry Adams (Plaintiff / Claimant)
- Witness 1 (Co-Worker)

Subject Matter: Human Resources retaliation, unequal disciplinary action

Date of Recording: Approx. May 2025

Length: Approx. 14 minutes

DECLARATION OF AUTHENTICITY

I, Larry Adams, declare under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am the Plaintiff/Claimant in related litigation against the Debtors.
2. I personally participated in the recorded conversation referenced herein.
3. The audio recording was made contemporaneously and has not been altered.
4. The following transcript is a true and accurate representation of that recording to the best of my knowledge.

Larry Adams

/s/ Larry Adams

Larry Adams/ Pro Se Claimant

TRANSCRIPT OF AUDIO RECORDING

[00:00] Larry Adams:

I'm about to literally do this shit by myself, baby Witness 1. This is ridiculous…

[01:30] Witness 1:

Damn. Damn. Yeah, yeah, yeah, yeah.

[01:45] Larry Adams:

So it's, like, basically, you know how you throw a baby in a pool, like, you want to see if they sink or swim?…

[02:45] Larry Adams:

But the thing is, I'm still gonna go through with it. Like, I'm gonna turn all my shit in Friday…

[04:00] Witness 1:

Yeah, and I mean, the worst, like, you going and trying to pursue something…

[04:45] Larry Adams:

Yeah. And the thing is, you know me, that's why I don't be trying to get people involved…

[05:20] Witness 1:

Yeah, I mean, you obviously feel like, you know, you were done wrong, and you obviously have shit to back that up…

[06:10] Larry Adams:

Yeah, I mean, to be honest, they don't mind helping. But it's just the fact of, Witness 1, I don't have 250 an hour.

[07:30] Larry Adams:

But, um, if you could, I would like to ask you, as a professional lawyer now, I would like to ask you five simple questions…

[07:45] Larry Adams:

What is your name? Witness 1, right. Where do you work and how long?

[07:55] Witness 1:

I work at Gleaf. I don't know how, since October?

[08:00] Larry Adams:

Were you at work the day, the altercation happened between the two supervisors?

[08:10] Witness 1:

I was there, yeah.

[08:12] Larry Adams:

And can you elaborate about what happened?

[08:15] Witness 1:

I just saw the tail end of it… Brandon said he was so mad that he could assault Tiago.

[08:40] Larry Adams:

Did anyone ever ask you about the altercation…?

[08:45] Witness 1:

No HR, no James, no supervisor asked me anything.

[08:50] Larry Adams:

Have you ever worked with Larry Adams before?

[08:52] Witness 1:

Yes, I would say he was one of the more hardworking people… Took initiative to do the jobs not everyone wanted, stayed professional.

[09:30] Larry Adams:

Thank you so, so much. I mean, that's all I know so that's all I can help you with.

[09:45] Larry Adams:

HR said that, "Oh, I haven't heard anything from you since the whole Connor situation."

[10:05] Witness 1:

Yeah, I mean, like, if they wanted…

[10:30] Larry Adams:

They couldn't have given me that reason Tuesday when I got…

[11:00] Larry Adams:

So, I did, the EEOC already sent their paperwork telling the head…

[11:55] Larry Adams:

I filed with the EEOC, VA Department of Labor, and I filed court papers.

[12:15] Witness 1:

Yeah, man, I mean, that all I can do is tell the truth.

[12:30] Larry Adams:

And I appreciate you doing that, and that's all I want from people.

[12:55] Witness 1:

I'm not super worried about them being like, "Hey, you said you saw this thing happen."

[13:10] Larry Adams:

Exactly. And where were you in the hallway?

[13:15] Witness 1:

I was walking into the break room, and Brandon was walking past me.

[13:25] Larry Adams:

Just making sure. Thank you, Witness 1.

[13:30] Witness 1:

Yeah, man, no problem. Good luck. I really hope you're able to do it.

[End] Larry Adams:

Oh, please believe. If I do it, we do it.

EXHIBIT A-7 (CONTINUED)

Audio Transcript –Witness 1 Corroboration)

KEY SUMMARY POINTS

Timestamp	Topic	Summary	Legal Relevance
08:00–08:15	Incident Confirmation	Witness confirms presence during altercation	Corroboration
08:15–08:40	Threat Statement	Witness states Brandon intended assault	Independent verification of threat
08:40–08:45	No Interview	Witness confirms no HR follow-up	Failure to investigate
09:00–End	Character Evidence	Witness supports Plaintiff's professionalism	Credibility support

EXHIBIT A-8/ P-20

EXHIBIT DESCRIPTION

This Exhibit consists of a true and accurate transcript of an audio-recorded conversation between:

- Larry Adams (Plaintiff / Claimant)
- Witness 4 (Co-worker)
- Witness 5 (Co-worker)

Subject Matter: Human Resources retaliation, unequal disciplinary action

Date of Recording: Approx. May 2025

Length: Approx. 14 minutes

DECLARATION OF AUTHENTICITY

I, Larry Adams, declare under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am the Plaintiff/Claimant in related litigation against the Debtors.
2. I personally participated in the recorded conversation referenced herein.
3. The audio recording was made contemporaneously and has not been altered.
4. The following transcript is a true and accurate representation of that recording to the best of my knowledge.

Larry Adams

/s/ Larry Adams

Larry Adams/ Pro Se Claimant

TRANSCRIPT OF AUDIO RECORDING

[00:00 – 02:15] Initial Discussion – Buyout & Job Security

Speaker 1 (Larry): With somebody, because they run by you and they want to buy it. Whoever they sell it to is just gonna come in and take over it with us being there, most likely.

Speaker 2 (Witness 4): But the thing is, I'm not… just like you went from GB to… I know, but I'm just letting him know. Like, hey…

Speaker 1 (Larry): Oh, I know. Please believe I know it's on the way down. But the thing is, I'm not the type of person, like I told you, I'm not about to let this shit go, Tom. I'm not about to let it go. These motherfuckers took my lavender from me. I was fine and I was comfortable here.

Speaker 3 (Witness 5): Yeah.

Speaker 1 (Larry): I knew after that conversation with James and Sean Tuesday, when I told them straight up to their face. I said, "I don't trust y'all. Everything y'all said to me has been a lie—from me interviewing for the next position to this snow shit."

[11:51 – 17:00] Evidence, Lawsuit Threat & Company Retaliation

Speaker 1 (Larry): It's about treating people right in the workplace. I want James to know there's a $4.6 million lawsuit coming.

Speaker 2 (Witness 4): They already ask me about you, but I don't say anything.

Speaker 1 (Larry): They fired me right after I sent the formal email and recording to Jake and HR. After I got fired, I sent it to higher-ups: Kevin McDermott, Christine Pope, Jesse Cannon, Brian Olsen, Blake Bower, John Gilbert—eight people in total.

Speaker 3 (Witness 4): So you sent it after you were fired?

Speaker 1 (Larry): Yes. I wasn't going to tip them off before.

Speaker 1 (Larry): I can get a lawyer now and they'll take the case, but I'd rather settle myself. Otherwise, I'll let everything out.

[17:01 – 23:30] Threats, Cover-ups & Settlement Demands

Speaker 1 (Larry): I'm not doing this for money. I just need those people gone. Those people all violated policies. If you want to throw the book at people, let's throw it at everyone.

Speaker 1 (Larry): Jake's already been in trouble before. He came from Baltimore with that bullshit.

Speaker 3 (Witness 5): Exactly. And Brandon? Back in the day, when I first got the job here, he sent angry "I'm going to kill you" texts and voicemails to Cam, the maintenance guy. They didn't fire him then either.

Speaker 3 (Witness 5): Yeah, you're dealing with someone they don't want to get rid of.

[End] Harassment History & Final Statements

Speaker 1 (Larry): I didn't even play the race card in my complaint. I stuck to harassment and retaliation, but I documented every issue—from Connor calling me "dog" to James' dismissive "sticks and stones," comments about leadership hating me.

Speaker 1 (Larry): HR agreed those comments came from upper management.

Speaker 1 (Larry): Exactly. That's why they didn't want me in the building anymore.

Speaker 3 (Tyler): If they offered you your job back?

Speaker 1 (Larry): Only as HR. I'm not coming back otherwise. And if they won't settle, we go to court and I air everything out.

EXHIBIT A-8 (CONTINUED)

(Audio Transcript – Multi-Witness Retaliation Discussion)

KEY SUMMARY POINTS

Timestamp	Topic	Summary	Legal Relevance
00:00–02:15	Job Security Concerns	Plaintiff expresses fear of replacement after buyout	Context for retaliation
02:16–06:30	Wrongful Termination	Plaintiff claims false accusations used	Evidence of pretext
06:31–11:50	Leadership Failures	Plaintiff disputes management narrative	Supports credibility
11:51–17:00	Retaliation Timing	Fired after reporting to HR and management	Strong causation link
17:01–23:30	Selective Discipline	Violent employee retained	Disparate treatment
23:31–28:20	Blame Shifting	Plaintiff claims scapegoating	Supports retaliatory motive
28:21–35:00	External Exposure	Mentions fear of public/legal scrutiny	Shows employer motive
35:01–41:30	Settlement Discussion	Plaintiff outlines demands	Shows dispute escalation
41:31–End	Evidence Strength	Plaintiff asserts extensive proof	Reinforces credibility

IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF DELAWARE

In re:

The Cannabist Company Holdings Inc., et al.,

Debtors.

Chapter 15

Case No. 26-10426 (BLS)

PROPOSED ORDER GRANTING (I) RELIEF FROM THE AUTOMATIC STAY AND (II) ADMISSION OF EVIDENCE

Upon consideration of the Motion of Larry Adams (the "Movant") for (I) Relief from the Automatic Stay and (II) Admission of Evidence (the "Motion"); and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and venue being proper in this District; and due and proper notice of the Motion having been provided; and it appearing that no other or further notice is necessary; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED, as set forth herein.

2. Relief from the Automatic Stay Granted

Pursuant to 11 U.S.C. § 362(d), the automatic stay is hereby modified to permit Movant, Larry Adams, to:

- Commence and/or continue litigation against the Debtors in a court of competent jurisdiction;
- Liquidate his claims arising from alleged employment discrimination, retaliation, and related causes of action;

provided, however, that Movant shall not seek to enforce any judgment against the Debtors or property of the Debtors' estates without further order of this Court.

3. Admission of Evidence for Purposes of This Motion

The exhibits submitted in support of the Motion, including but not limited to:

- Exhibit A-1 (Audio Transcript)
- Exhibit A-2 and related documentary evidence

are hereby admitted for purposes of this Motion, subject to any objections that may be raised in any non-bankruptcy forum.

4. No Determination on the Merits

Nothing in this Order shall be construed as a determination of the merits of Movant's underlying claims, which shall be determined by the appropriate non-bankruptcy court.

5. Retention of Jurisdiction

This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.

IT IS SO ORDERED.

Date: April 13, 2026

Wilmington, Delaware

United States Bankruptcy Judge

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