UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION
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| IN RE: | Chapter 11Cases |
|---|---|
| Trajector Holdings, LLC | 3:26-03286-JAB<br>Lead Case |
| | *Jointly Administered with:* |
| Benefits Group Holdings, LLC | 3:26-03289-JAB |
| Trajector Medical, LLC | 3:26-03291-JAB |
| Infinite IP LLC | 3:26-03293-JAB |
| Perfect Path, LLC | 3:26-03295-JAB |
| Trajector Admin Services, LLC | 3:26-03296-JAB |
| Benefits Insurance, LLC | 3:26-03297-JAB |
| Myler Insurance Services Holdings, LLC | 3:26-03298-JAB |
| AnchorSix Services, LLC | 3:26-03299-JAB |
| Atvantage, LLC | 3:26-03300-JAB |
| Trajector Media Services, LLC | 3:26-03301-JAB |
| Globaltek BPO LLC | 3:26-03302-JAB |
| Myler Disability Holdings, LLC | 3:26-03304-JAB |
| Myler Disability, LLC | 3:26-03306-JAB |
| Adduco Media, LLC | 3:26-03307-JAB |
| Trajector Disability, LLC | 3:26-03308-JAB |
| Contact Center 1, LLC | 3:26-03309-JAB |
| Benefits Karma, LLC | 3:26-03310-JAB |
| Executive Staffing Solutions, PLLC | 3:26-03311-JAB |
| Ampry Holdings, LLC | 3:26-03312-JAB |
| Concierge Staffing Service Management, LLC | 3:26-03314-JAB |
| Trajector, Inc. | 3:26-03315-JAB |
| Debtors. | |

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**UNITED STATES TRUSTEE'S OBJECTION TO DEBTORS' EMERGENCY MOTION FOR ENTRY OF ORDER (I) AUTHORIZING THE DEBTORS TO FILE (A) A CONSOLIDATED CREDITOR MATRIX AND (B) A CONSOLIDATED LIST OF THE TOP THIRTY UNSECURED CREDITORS; AND (II) AUTHORIZING THE DEBTORS TO SUPPRESS**



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**CERTAIN PERSONALLY IDENTIFIABLE INFORMATION FOR INDIVIDUAL CREDITORS, EMPLOYEES, AND PARTIES IN INTEREST**

Guy A. Van Baalen, Acting United States Trustee for Region 21 ("United States Trustee"), objects to the Debtors' Emergency Motion for Entry of Order (I) Authorizing the Debtors to File (A) a Consolidated Creditor Matrix and (B) a Consolidated List of the Top Thirty Unsecured Creditors; and (II) Authorizing the Debtors to Suppress Certain Personally Identifiable Information for Individual Creditors, Employees, and Parties in Interest (Doc. 12; "Suppression Motion"). In support of this objection, the United States Trustee states as follows.

**SUMMARY ARGUMENT**

The United States Trustee objects to the suppression of all information related to the names, residential addresses, and email addresses of: (i) Debtors' current and former employees, many of whom are likely creditors, and (ii) individual creditors and parties in interest, in the creditor mailing matrix ("Creditor Matrix") and any future filings made by the Debtors in these cases. There is a strong presumption under 11 U.S.C. § 107, and in American jurisprudence generally, that the public has a right of access to judicial records. The Debtors' request improperly reverses this presumption and risks depriving current and former employees, customers and creditors of the collection mechanisms that can benefit creditors in bankruptcy. Even if the Court is inclined to grant Debtors' request, the request should be limited to individuals who are unlikely to play a meaningful role in the case going forward,

such as employees who are paid their pre-petition wage claims in full through the Debtors' wage motion. (*See* Docs. 25, 57).

## BACKGROUND

1. On July 23, 2026 ("Petition Date"), the above captioned debtors ("Debtors") filed voluntary petitions under chapter 11 of the Bankruptcy Code. These cases are jointly administered. (Doc. 63).

2. Debtors have yet to file any bankruptcy schedules or statements of financial affairs and obtained an extension through August 19, 2026, by which to do so. (Doc. 94). The Section 341 Meetings of Creditors are currently scheduled for August 26, 2026, at 10:00 a.m.

3. According to their First Day Declaration (Doc. 39), Debtors are a "mission-driven services organization that helps the underserved and at-risk disabled population pursue disability and related benefits from government agencies." (Doc. 39 at 3). Debtors have "thousands of creditors and other parties in interest." (*Id*. at 32).

4. On the Petition Date, Debtors filed the Suppression Motion, seeking the Court's permission to redact and suppress from any paper filed with the Court in Debtors' Chapter 11 cases, including the creditor mailing matrix and any future filing by Debtors in these cases, the names, residential and email addresses, and other personal information of Debtor's current and former employees and individual

creditors and parties in interest ("Individual Information"). The Motion generally argues that this relief is warranted because of a risk of harm to the individuals, and potential liability for Debtors under the California Consumer Privacy Act ("CCPA"). According to the Suppression Motion, Debtors "estimate that they have thousands of potential individual creditors and parties in interest and over 1,000 current and former employees." (Doc. 12 at 8).

5. On July 24, 2026, the Court conducted a preliminary hearing on the Suppression Motion, during which the undersigned counsel for the United States Trustee previewed this objection. The Court scheduled a final hearing on the Suppression Motion for August 17, 2026, and directed interested parties to file any objections to the Suppression Motion by August 10, 2026 (Doc. 80).

**OBJECTIONS**[1]

6. The United States Trustee objects to Debtors' request to suppress the names, residential addresses and email addresses of the Debtors current and former employees and individual customers and parties in interest in all documents filed with this Court, including without limitation, the creditors mailing matrix, affidavits, certificates of service, bankruptcy schedules of assets and liabilities, voting reports,

[1] The United States Trustee is no longer pursuing his objection to Debtors' request to file a Consolidated Top 30 List of Debtors' top thirty (30) unsecured creditors. The United States Trustee anticipates appointing an Official Committee of Creditors Holding General Unsecured Claims in short order, and thus, this objection appears to be moot.

and any future filing made by Debtors in these cases.

7. Through their request, Debtors seek to reverse the presumption in favor of public access to court records without providing the Court with any evidence of exceptional circumstances. "There is a strong presumption and public policy in favor of public access to court records." *In re Celsius Network LLC*, 644 B.R. 276, 287 (Bankr. S.D.N.Y. 2022) (internal citations omitted). "The public interest in openness of court proceedings is at its zenith when issues concerning the integrity and transparency of bankruptcy court proceedings are involved." *Id.* at 288 (internal citations omitted).

8. In addition to public access, disclosure of creditors in this bankruptcy case serves other purposes essential to the orderly administration of the bankruptcy case. For example, a creditor who is listed on Debtors' bankruptcy schedules has an allowed claim without the necessity of filing a proof of claim. *See* Fed. Rule of Bankr. 3003. Creditors who receive notice that a debtor has listed them as a creditor on the debtor's schedules can avoid the expense of hiring counsel, which is particularly beneficial for unsophisticated creditors with small claims.

9. Furthermore, creditors in bankruptcy cases often band together to represent their collective interest by seeking common attorney representation or by requesting that the United States Trustee appoint additional committees. *See* 11 U.S.C. § 1102(a)(2). This potential for collective action is thwarted by suppression

of creditor information.

10. Debtors have not offered any specific information to meet the standard of 11 U.S.C. § 107. Section 107(a) sets forth the presumption that "a paper filed in a case under this title and the dockets of a bankruptcy court are public records and open to examination by an entity at reasonable times without charge."

**A. Relief is not warranted under 11 U.S.C. § 107(b).**

11. Section 107(b) sets forth a limited exception to this general rule of transparency if necessary to "(1) protect an entity with respect to a trade secret or confidential research, development, or commercial information; or (2) protect a person with respect to scandalous or defamatory matter contained in a paper filed in a [bankruptcy] case. . .." 11 U.S.C. § 107(b). In Debtors' cases, a customer list comprising merely customer names may not constitute confidential commercial information because it contains insufficient information from which customers may be identified and Debtor's privacy policy may permit disclosure of such information in some instances. See Sarah Jones, *Redaction of Creditor Names*, ABI Journal, June 2024 at 38, 39 and 50. See also Proofs of Claim Nos. 2-1, 4-1, 6-1 and 10-1.

12. Moreover, to the extent Debtors are concerned about protecting such information from its competitors, such concern, in absence of evidentiary support, is insufficient to warrant suppression.

**B. Relief is not warranted under 11 U.S.C. § 107(c).**

13. Section 107(c)(1) sets forth a limited exception to the general rule of transparency for situations where the Court finds that "disclosure of such information would create undue risk of identity theft or other unlawful injury to the individual or the individual's property . . .."

14. In the Suppression Motion, Debtor have merely asserted, without proof, that disclosure of its employees' and creditors' personally identifiable information "could" expose them to identity theft or other harm. An unquantified, strictly theoretical possibility of injury, however, falls far short of the statutory "undue risk" standard of § 107(c)(1), and does not excuse the wholesale redaction of every document filed with the bankruptcy court.

**C. Relief is not warranted under the CCPA.**

15. Even if the CCPA indeed applies to Debtors in these cases, it does not warrant the suppression Debtors are requesting. For example, the CCPA has carve outs for Debtors' obligations to comply with the Bankruptcy Code. Cal. Civ. Code § 1798.145 (a) (1) (2023) ("The obligation imposed on businesses by this title shall not restrict a business' ability to: (1) Comply with federal, state, or local laws."). Additionally, the claims agent in this case (see Suppression Motion at ¶ 10, 21-2) may be protected because it is performing an essential government function. Cal. Civ. Code § 1798.105(n)(1)(2023) (explaining that the obligations of the CCPA

shall not apply to government agencies). The Suppression Motion did not engage these carve outs from liability under the CCPA, which appear on their face to address Debtors' concerns regarding liability for data disclosure.

**D. Debtor has failed to furnish to the United States Trustee information critical to evaluate the Suppression Motion.**

16. Debtor indicated that its claims agent "will maintain a list of the suppressed individuals so that the Debtors can track and confirm service of court paper details, which will also be made available to the Court and the U.S. Trustee upon request." (Suppression Motion at 8). However, without having access to such information, the United States Trustee cannot evaluate fully the relief requested in the Suppression Motion.

17. Finally, the United States Trustee may need to refer to certain Individual Information when appointing official committees or otherwise performing his statutory obligations or seeking relief under the Bankruptcy Code in these cases. The United States Trustee does not want to be restricted in any way from doing so under the terms of the Suppression Motion or any order granting same.

## CONCLUSION

For these reasons, Debtors should not be permitted to suppress the Individual Information in all documents filed with this Court. The Suppression Motion should be denied, or at least limited to creditors who are unlikely to play a role going

forward in these cases (*e.g.*, employee creditors who are paid through Debtors' first day wage motion), or limited to information that will still allow meaningful public disclosure and collective action mechanisms within the bankruptcy cases (*e.g.*, suppression of addresses and email addresses but not names of individuals).

The wholesale redaction of the information of important creditors and parties in interest will cause problems in the administration of these cases. Furthermore, parties in interest should have full access to creditor information and access to unredacted creditor information so that they can protect their own interests, while the Court reserves the possibility of reconsideration of the order at any point during the pendency of these cases for good cause shown.

WHEREFORE, the Court should deny the Suppression Motion; or alternatively provide for the least restricted relief that allows for the fullest possible disclosure to address the United States Trustee's concerns; and/or take such other actions as the Court deems necessary.

Dated: August 10, 2026

Respectfully submitted,

Guy A. Van Baalen,
Acting United States Trustee for Region 21

*/s/ Jill Ellen Kelso*
Jill Ellen Kelso, Trial Attorney
Florida Bar 0578541
Office of the United States Trustee
U.S. Department of Justice
400 W. Washington St., Suite 1100

Orlando, FL 32801
Telephone No.: (407) 648-6286
Email: jill.kelso@usdoj.gov

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion was served on August 10, 2026, on all parties appearing electronically via CM/ECF.

*/s/ Jill Ellen Kelso*
Jill Ellen Kelso, Trial Attorney