UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION
www.flmb.uscourts.gov

IN RE:	Chapter 11 Cases
TRAJECTOR HOLDINGS, LLC,[1]	Case No. 3:26-bk-03286-JAB Lead Case
	Jointly Administered with
BENEFITS GROUP HOLDINGS, LLC,	Case No. 3:26-bk-03289-JAB
TRAJECTOR MEDICAL, LLC,	Case No. 3:26-bk-03291-JAB
INFINITE IP LLC,	Case No. 3:26-bk-03293-JAB
PERFECT PATH, LLC,	Case No. 3:26-bk-03295-JAB
TRAJECTOR ADMIN SERVICES, LLC,	Case No. 3:26-bk-03296-JAB
BENEFITS INSURANCE, LLC,	Case No. 3:26-bk-03297-JAB
MYLER INSURANCE SERVICES HOLDINGS, LLC,	Case No. 3:26-bk-03298-JAB
ANCHORSIX SERVICES, LLC,	Case No. 3:26-bk-03299-JAB
ATVANTAGE, LLC,	Case No. 3:26-bk-03300-JAB
TRAJECTOR MEDIA SERVICES, LLC,	Case No. 3:26-bk-03301-JAB
GLOBALTEK BPO LLC,	Case No. 3:26-bk-03302-JAB
MYLER DISABILITY HOLDINGS, LLC,	Case No. 3:26-bk-03304-JAB
MYLER DISABILITY, LLC,	Case No. 3:26-bk-03306-JAB
ADDUCO MEDIA, LLC,	Case No. 3:26-bk-03307-JAB
TRAJECTOR DISABILITY, LLC,	Case No. 3:26-bk-03308-JAB
CONTACT CENTER 1, LLC,	Case No. 3:26-bk-03309-JAB
BENEFITS KARMA, LLC,	Case No. 3:26-bk-03310-JAB
EXECUTIVE STAFFING SOLUTIONS, PLLC,	Case No. 3:26-bk-03311-JAB
AMPRY HOLDINGS, LLC,	Case No. 3:26-bk-03312-JAB
CONCIERGE STAFFING SERVICE MANAGEMENT, LLC,	Case No. 3:26-bk-03314-JAB
TRAJECTOR, INC.,	Case No. 3:26-bk-03315-JAB
Debtors.	

PUTATIVE CLASS CLAIMANTS' *EMERGENCY* MOTION TO COMPEL DOCUMENT PRODUCTION AND REQUEST FOR EXPEDITED CONSIDERATION

(*Emergency Hearing Requested*)

[1] The Debtors' mailing address is 5950 NW 1st Place, Suite 200, Gainesville, FL 32607. The last four digits of each Debtor's federal tax identification number are: (i) Trajector Holdings, LLC (7528); (ii) Benefits Group Holdings, LLC (2029); (iii) Trajector Medical, LLC (5243); (iv) Infinite IP LLC (3723); (v) Perfect Path, LLC (3494); (vi) Trajector Admin Services, LLC (2231); (vii) Benefits Insurance, LLC (9835); (viii) Myler Insurance Services Holdings, LLC (3606); (ix) AnchorSix Services, LLC (5009); (x) Atvantage, LLC (7384); (xi) Trajector Media Services, LLC (7509); (xii) Globaltek BPO LLC (1684); (xiii) Myler Disability Holdings, LLC (9924); (xiv) Myler Disability, LLC (0845); (xv) Adduco Media, LLC (0257); (xvi) Trajector Disability, LLC (5136); (xvii) Contact Center 1, LLC (2329); (xviii) Benefits Karma, LLC (1850); (xix) Executive Staffing Solutions, PLLC (1841); (xx) Ampry Holdings, LLC (2323); (xxi) Concierge Staffing Service Management, LLC (2814); and (xxii) Trajector, Inc. (2128).

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Local Rule 7026-1(d) Certification

After initial production on October 8, 2026, the undersigned counsel requested a meet and confer to discuss discovery and trial issues with the Debtors on October 9, 2026. On October 12, 2026, counsel for the Class Claimants and the Debtors conferred by videoconference for approximately one hour concerning, *inter alia*, the deficiencies addressed below and the requested production. The undersigned followed up on the meet and confer, requesting the Debtors' position on October 13, 2026 and the Debtors informally supplemented with a short email response. The parties have not resolved the disputed Requests. This Motion is being filed because, as of the date hereof, the Debtors have not withdrawn their objections, properly supplemented their Responses, or produced the additional responsive documents requested. ***For the avoidance of doubt, this Motion is principally directed at three Requests for Production, reproduced below.***

Gilbert Quijada, Jr., Jeffrey Phillips, and Kimberly Phillips, individually and on behalf of all others similarly situated (collectively, the "**Class Claimants**"), move under Federal Rules of Civil Procedure 26, 34, and 37, as incorporated by Federal Rules of Bankruptcy Procedure 7026, 7034, 7037, and 9014(c), to compel the above-captioned debtors and debtors in possession (collectively, the "**Debtors**") to provide complete responses and produce documents responsive to the *Class Claimants' First Requests for Production*, attached hereto as **Exhibit A**. The Class Claimants further request expedited consideration and, if necessary to cure the prejudice caused by delayed production, permission to supplement the record for the October 15, 2026 evidentiary hearing concerning class treatment and class tolling. In support, the Class Claimants state as follows:

Background

1. On July 23, 2026 (the "**Petition Date**"), the Debtors commenced these chapter 11 cases. On July 28, 2026, the Court directed their joint administration under Lead Case No. 3:26-bk-03286-JAB.

2. On September 16, 2026, the Class Claimants filed the *Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* [Dkt. No. 234] (the "**Rule 7023 Motion**") and the *Putative Class Claimants' Expedited Motion to Extend and/or Toll the Claims Bar Date Pending Resolution of Class-Treatment* [Dkt. No. 235] (the "**Class Tolling Motion**," and together with the Rule 7023 Motion, the "**Pending Motions**").[2]

3. On September 25, 2026, the Debtors filed responses opposing both motions [Dkt. Nos. 253 and 254]. In doing so, the Debtors placed at issue, among other things: (a) whether the Class Actions influenced the bankruptcy filing; (b) how the Debtors and Verita selected and served notice recipients; (c) whether the Cover Letters were clear and effective; (d) what the low filing rate indicates; (e) which arbitration provisions and class waivers govern; and (f) whether class treatment would increase administrative costs, delay the cases, reduce creditor recoveries, or yield *de minimis* recoveries. *See, e.g.*, Dkt. No. 254 at ¶¶ 45, 49–62; Dkt. No. 253 at pp. 3–5.

4. At the preliminary hearing on the Pending Motions held on September 29, 2026 (the "**Preliminary Hearing**"), counsel for the Debtors represented that, during fourteen years of operations, "only eight clients have ever filed lawsuits or sought arbitration against Trajector Medical." Hr'g Tr. 58:16–23 (Sept. 29, 2026). [3] The Debtors argued that this was significant because they "do not believe that the clients ultimately have claims." *Id.* at 58:24–59:3. In addressing whether further bar-date notice was warranted, the Court observed that "there's not a lot of pre-petition litigation here," *id*. at 72:16–23, and further stated that "the lack of pre-petition issues from this hundred and eighty thousand pool of people is weighing pretty heavily in my

[2] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in, as applicable, the Rule 7023 Motion, the Class Tolling Motion, the Requests (as defined herein), or the Responses (as defined herein).

[3] The Class Claimants' position is that the existence or nonexistence of prior veteran complaints against the Debtor is not relevant or probative to resolution of the Pending Motions. To the extent, however, that the Debtors intend to rely on counsel's proffer at the evidentiary hearing, Class Claimants are entitled to discovery on this issue, as well as on the existence of "claims," as defined by the Bankruptcy Code.

mind," *Id.* at 75:8–16. The Court emphasized the need for "some evidence, something, more than what you did today." *Id.* at 76:12–20.

5. On October 1, 2026, the Court entered its *Order Scheduling Evidentiary Hearing* [Dkt. No. 287] (the "**Scheduling Order**"). The Scheduling Order set an in-person evidentiary hearing for October 15, 2026, at 10:00 a.m. (the "**Evidentiary Hearing**") and required the parties to exchange exhibits by October 8, 2026.

6. On October 6, 2026, the Class Claimants served their *First Requests for the Production of Documents to the Debtors* (the "**Requests**"), attached hereto as **Exhibit A**. In light of the compressed hearing schedule, the Requests sought responses and production by October 8, 2026. October 8, 2026 was the Court-ordered exhibit-exchange date and the same deadline as the Debtors' October 6, 2026 requests for production propounded on the Class Claimants.

7. On October 8, 2026, the Debtors served their *Response to Putative Class Claimants' First Requests for the Production of Documents* (the "**Responses**"), attached as **Exhibit B**. The Responses assert broad relevance, proportionality, burden, privilege, work-product, and privacy objections, and promise only limited production as to certain Requests. As of the filing of this Motion, the Debtors have not produced any additional items in response to the Requests, instead referring the Class Claimants to the Debtors' exhibit register [Dkt. Nos. 302, 303, 313] and providing certain information through an informal email supplement. The Debtors have withheld or failed to produce documents described generally below as "Client Service Agreements and Assent," "Recipient Engagement and Requests for Assistance," and "Existing Complaint and Regulatory Summaries." No privilege log accompanied the Responses, and none has been

produced as of the filing of this Motion. The Responses also do not consistently state whether responsive materials are being withheld on the basis of each objection.[4]

8. On October 12, 2026, counsel conferred for approximately one hour concerning stipulations of facts, various of the disputed Requests, and the production needed for the Evidentiary Hearing. During that conference, the Debtors and Class Claimants were unable to resolve certain disputed Responses, the Class Claimants agreed to narrow certain Requests for purposes of the upcoming Evidentiary Hearing (without prejudice to later seeking production), and the Debtors agreed to get back to the Class Claimants regarding whether the pared-down Requests resolved the Debtors' objections. On October 13, 2026, the undersigned followed up with counsel for the Debtors inquiring about the outstanding Requests. After close of business on October 13, 2026, the Debtors informally supplemented their Responses via narrative description in email, raising additional objections (the "**Informal Supplement**"), attached hereto as **Exhibit C**. No new documents were produced with the Informal Supplement. As of the date hereof, the parties have not resolved the disputed Responses.

9. Emergency relief is required because the Evidentiary Hearing is set for October 15, 2026. Unless the Debtors are required to produce the evidence underlying their own factual contentions (or the Class Claimants are allowed to supplement the record) the Debtors will be permitted to litigate those contentions while denying the Class Claimants a meaningful opportunity to test them. Absent relief, direct, immediate, and substantial harm will occur to the Class Claimants' interests in their claims, and the estates risk the expense of a duplicative or reconvened evidentiary proceeding. The Debtors should either be precluded from putting on evidence or

[4] On October 8, 2026, in response to the Debtors' first request for production, also dated as of October 6, 2026 with a response date of October 8, 2026, the Class Claimants timely produced written responses and objections, along with documents bearing Bates Nos. VET-TRAJ-000001 to VET-TRAJ-009059.

argument related to the disputed Requests, or the Class Claimants should be provided an opportunity to supplement the record.

Applicable Standards

10. Bankruptcy Rule 9014(c) applies Bankruptcy Rules 7026, 7034, and 7037 in this contested matter. Those Rules incorporate Civil Rules 26, 34, and 37. Civil Rule 26(b)(1) permits discovery of nonprivileged matter relevant to a claim or defense and proportional to the needs of the case, considering, among other things, the parties' relative access to information and the importance of the discovery in resolving the issues.

11. Under Civil Rule 34(b)(2)(B)–(C), a response must state with specificity the grounds for each objection, including the reasons, and must state whether responsive materials are being withheld on the basis of the objection. If privilege or work product is asserted, Civil Rule 26(b)(5)(A) requires the withholding party to describe the nature of the withheld material in a manner that enables the requesting party to assess the claim.

12. The Debtors' objections, which are raised in an improper boilerplate manner and include no supporting factual or legal argument, are legally insufficient. *See Asphalt Paving Sys., Inc. v. General Combustion Corp.*, 2016 WL 3167712, at *2 (M.D. Fla. June 7, 2016) ("The Court does not consider frivolous, conclusory, general, or boilerplate objections.") (citation omitted); *Siddiq v. Saudi Arabian Airlines Corp.*, 2011 WL 6936485, at *3 (M.D. Fla. Dec. 7, 2011) ("Objections which state that a discovery request is 'vague, overly broad, or unduly burdensome' are, by themselves, meaningless, and are deemed without merit by this Court.") (citations omitted); *Polycarpe v. Seterus, Inc.*, 2017 WL 2257571, at *2 (M.D. Fla. May 23, 2017) ("Disappointingly, attorneys who are supposed to know better continue to preface their discovery responses with boilerplate, general objections . . . which serve no purpose other than to waste the reader's time.").

13. Generalized relevance and burdensomeness objections are insufficient under Civil Rules 26 and 34. An undue-burden objection requires a particularized explanation of the burden imposed, and an unsupported assertion that production would be difficult is insufficient. The Debtors identify no specific search, volume of documents, estimated expense, or other facts demonstrating that producing the requested materials would impose a burden disproportionate to their importance in resolving the issues before the Court.[5] Their objections are particularly unavailing where the Requests seek existing business records and data concerning matters the Debtors themselves have placed in dispute.

14. Civil Rule 37(a)(3)(B)(iv) authorizes a motion to compel when a party fails to produce documents as requested under Rule 34, and Rule 37(a)(4) treats an evasive or incomplete response as a failure to respond. Rule 37(a)(5) addresses the expenses incurred in making a successful motion to compel.

15. Local Rule 7037-1 requires a motion to compel to quote in full each Request, the objection and grounds stated by the opposing party, and the reasons the objection should be overruled. The Class Claimants do so below. To the extent the Court concludes any Request is broader than necessary for the Evidentiary Hearing, the Class Claimants request the narrower production described in the corresponding explanation.[6]

[5] And, to the extent the volume of complaints by customers is so voluminous to create a cognizable burden, that itself demonstrates there were significant prepetition veteran claims against the Debtors, albeit disputed.

[6] For the purposes of this Motion, in light of the expedited timeframe for the Evidentiary Hearing, this Motion seeks to compel production only as to certain Requests, as highlighted in the course of the meet and confer with the Debtors. The Class Claimants nevertheless submit that many of the Responses are inadequate, and the wholesale withholding of documents (except as provided on the Debtors' own exhibit register) is inappropriate. The Class Claimants reserve the right to seek additional production.

Argument

I. The Debtors' Common Objections Do Not Justify Withholding the Requested Documents.

16. The Debtors' relevance objection rests on an artificially narrow description of the disputed issues. Although the Responses characterize the Rule 7023 Motion as presenting only prematurity, arbitration, and waiver, the Debtors' opposition separately relies on all three *Musicland*[7] factors, argues other Rule 7023 factors raised in the Rule 7023 Motion, and incorporates their bar-date arguments. The Requests track the Debtors' own assertions about the cause of filing, notice, recipient response, arbitration agreements, class waivers, and administrative effect.

17. The blanket privilege and work-product objections are likewise insufficient. The Requests encompass substantial nonprivileged factual and business material, and the Debtors have not identified the documents withheld or the basis for each claim. The proper remedy is production of nonprivileged and segregable material and a compliant privilege log; wholesale refusal to produce is not.

18. The privacy objection confuses public filing with confidential discovery. The Debtors' first-day declaration states both that the Debtors and Verita prepared a consolidated creditor list that would be made available electronically to a requesting party in interest and that the requested suppression concerned names and contact information appearing in "any paper filed with the Court." Dkt. No. 39 at ¶¶ 93, 95. Any legitimate privacy concern can be addressed through redaction, anonymized unique identifiers, or attorneys'-eyes-only treatment.

19. Finally, directing the Class Claimants to the public record does not answer Requests seeking the underlying support for the Debtors' factual contentions. Nor does the compressed

[7] 362 B.R. 644 (Bankr. S.D.N.Y. 2007).

schedule warrant a one-sided evidentiary hearing. The Class Claimants timely responded to the Debtors' requests for production rather than merely refer the Debtors to the Class Claimants' own exhibit register; the Debtors should do the same. The appropriate relief is immediate, rolling production and, if production cannot be completed in time for meaningful review, a short continuation or permission to supplement the record.

II. The Disputed Requests and Responses.[8]

Request No. 3 – Client Service Agreements and Assent

REQUEST: All versions of Client Service Agreements used from March 1, 2022 through the Petition Date, together with Documents sufficient to show the dates each version was used, the number of clients subject to each version, and the executed agreements and assent records for Gilbert Quijada, Jr., Jeffrey Phillips, and Kimberly Phillips.

RESPONSE: Debtors object to Request Number 3 on the grounds that it is overbroad and unduly burdensome. Identifying the number of clients subject to each version would be a Herculean task since there are approximately 129,068 clients or former clients (particularly when the production deadline is October 8, 2026).

Debtors: (a) provide the following non-objectionable response; and (b) will produce the following non-privileged/non-objectionable documents responsive to Request Number 3:

No Client Service Agreement exists between any of the Debtors and Kimberly Phillips ("Ms. Phillips") because she was never a client of any of the Debtors. Instead, Ms. Phillips attempts to assert claims through her husband, Jeffrey Phillips, who (unlike Ms. Phillips) was a Trajector Medical client.

Debtors will produce four (4) versions (with each new version replacing the prior one) of the Client Service Agreement used from March 1, 2022 through the Petition Date (with the files reflecting the start date for each version). Moreover, Debtors already provided the Client Service Agreements to the Putative Class Claimants executed by Jeffrey Phillips and Gilbert Quijada, Jr. as **Exhibit C** and **Exhibit D** to the *Debtors' Response in Opposition to Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* (Doc. 254), respectively.

INFORMAL SUPPLEMENT: Client service agreements – while we would normally prefer bates stamping, in the interest of time, please see attached. These show the dates in the title when the company began using each contract.

Lynn asked about whether a Trajector Medical client with a prior contract would stay under that contract even if there was a later VA increase in benefits after a new contract started being used. My understanding is that in the majority of circumstances, they would stay with the original contract (absent some reason to use a new contract which are done on a case by case basis).

As to how many clients use a particular form of agreement, there is no document with that data that exists.

[8] The Class Claimants focus this Motion on certain of the most important Requests in light of the emergency nature of this Motion, and respectfully reserve the right to seek further relief.

Why the objection should be overruled. The Debtors oppose class treatment on the ground that arbitration provisions and class waivers govern the claims. The dates of each agreement version, the number of clients subject to each version, and assent records for the named claimants therefore go to a central defense and are not collateral merits discovery. The Informal Supplement confirms that the applicable agreement version depends on when each client contracted, subject to exceptions determined on a case-by-case basis. Although the Debtors represent that no existing document summarizes the number of clients subject to each version, that representation does not establish that the underlying information is unavailable from existing client records or electronic data. The Class Claimants are entitled to production of existing records or reasonably accessible data sufficient to identify the applicable agreement versions and their prevalence, together with all execution and assent records for the named claimants. The Debtors have not identified any particularized burden that would justify withholding such records or data.

Request No. 7 – Recipient Engagement and Requests for Assistance

> **REQUEST:** All Documents reflecting or analyzing recipient engagement with the Bar Date Notice, Cover Letters, proof-of-claim form, or Verita website, including email open or click data, website analytics, telephone logs, inquiries, complaints, and requests for assistance.
>
> **RESPONSE:** Debtors object to Request Number 7 on the grounds that it seeks documents protected by the attorney-client privilege and/or work-product doctrine.
>
> Debtors also object to Request Number 7 on the grounds that it seeks documents that are not: (a) relevant to a claim or defense; and (b) proportional to the needs of the case, considering: (1) the parties' relative access to relevant information; (2) the parties' resources; (3) the importance of the discovery in resolving the issues; and (4) whether the burden or expense of the proposed discovery outweighs its likely benefit. To be clear, the documents requested are irrelevant to the issues raised in: (a) *Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* (Doc. 234), that is, whether the Bankruptcy Court should apply Fed. R. Bankr. P. 7023 to the putative class claims; and (b) *Debtors' Response in Opposition to Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* (Doc. 254), that is, whether the: (1) request for application of Bankruptcy Rule 7023 is premature; and (2) putative class claims are all subject to arbitration, the Putative Class Claimants have waived the right to participate in a class action (or both).
>
> Debtors will produce the following non-privileged/non-objectionable documents responsive to Request Number 7: a Veritas call log reflecting communications with certain putative class members (with clients' or former clients' names and other personal identifiable information redacted per the Court's Order (Doc. 154).

> **INFORMAL SUPPLEMENT:** On the latest email service of the Amended Bar Date Notice (just completed), I was able to get email open and click data. For the Trajector Medical sent email, 113,001 emails were sent successfully on October 8, 2026. Of those, so far 89.4% opened the email (101,058) and 28.4% clicked on either of the links (32,111). The company also asked Verita to help with service on certain emails that it was having trouble serving (12,924 emails). Of those, so far 5,040 opened the email and 1,187 clicked either of the links..

Why the objection should be overruled. Recipient engagement is the most direct evidence of whether the notice program actually informed recipients. The Debtors rely on the low filing rate while resisting production of email open and click data, website analytics, complaints, inquiries, and requests for help. The redacted call log addresses only one portion of the Request, and given the electronic notice at issue in these cases, perhaps the least likely to meaningfully provide information. The Debtors should produce all available engagement analytics and logs. Indeed, the Informal Supplement establishes that the Debtors or Verita possess, or can access, precisely the type of email engagement data requested. Yet the Debtors have provided only selected aggregate statistics, without the underlying records or corresponding information concerning the prior notices. The Debtors should produce the underlying records supporting the disclosed statistics, any corresponding data concerning the prior notice, and the remaining responsive records.

Request No. 11 – Existing Complaint and Regulatory Summaries

> **REQUEST:** Documents sufficient to identify and summarize complaints, claims, lawsuits, arbitrations, and governmental or regulatory inquiries or actions concerning the Debtors' services to veterans, VA accreditation, fees, billing, or collection practices, including any existing complaint trackers, summaries, reports, or final agency correspondence, and further including all Communications from any federal, state, or local governmental or regulatory authority, including any state attorney general, the United States Department of Veterans Affairs, the VA Office of General Counsel, the VA Office of Inspector General, the Federal Trade Commission, or the Consumer Financial Protection Bureau, concerning a Debtor's advertising, contracting, provision of services to veterans or dependent spouses, VA accreditation, fees, billing, collections, or related business practices.
>
> **RESPONSE:** Debtors object to Request Number 11 on the grounds that it seeks documents protected by the attorney-client privilege and/or work-product doctrine.
>
> Debtors also object to Request Number 11 on the grounds that it seeks documents that are not: (a) relevant to a claim or defense; and (b) proportional to the needs of the case, considering: (1) the parties' relative access to relevant information; (2) the parties' resources; (3) the importance of the discovery in resolving the issues; and (4) whether the burden or expense of

> the proposed discovery outweighs its likely benefit. To be clear, the documents requested are irrelevant to the issues raised in: (a) *Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* (Doc. 234), that is, whether the Bankruptcy Court should apply Fed. R. Bankr. P. 7023 to the putative class claims; and (b) *Debtors' Response in Opposition to Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* (Doc. 254), that is, whether the: (1) request for application of Bankruptcy Rule 7023 is premature; and (2) putative class claims are all subject to arbitration, the Putative Class Claimants have waived the right to participate in a class action (or both).
> Debtors provide the following non-objectionable response to Request Number 11:
> Please see the record, including, but not limited to the Complaint commencing the Quijada class action attached as **Exhibit A** to *Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* (Doc. 234). Debtors will produce the Complaint commencing the Baker class action.
> **INFORMAL SUPPLEMENT:** Regarding a complaint tracker, there is not a complaint tracker utilized across the company. The company utilizes a CRM program and complaints (if any) are tracked on a client-by-client basis. In addition to our previous objections, we also object to this request on relevance as it does not go to any of the Musicland factors/merits of the Rule 7023 Motion as well as burdensomeness.
> Regarding correspondence with governmental agencies, we object on relevance to the Rule 7023 Motion before the court and burdensomeness grounds. The governmental agencies, whether acting on behalf of themselves or the residents of a state, have a separate governmental bar date. .

Why the objection should be overruled. Existing complaint trackers, summaries, reports, and governmental correspondence bear on the existence, number, and character of claims outside the filed claims register—facts directly relevant to the need for aggregate treatment and to the Debtors' inference from a low filing rate. The Request is proportional because it seeks documents sufficient to identify and summarize the matters, existing trackers, and correspondence, not every underlying file or document. The Quijada and Baker complaints are already known and do not substitute for the Debtors' own trackers, summaries, or agency communications. The Informal Supplement confirms that complaint information is maintained within the Debtors' CRM system, even if no centralized complaint tracker exists. The Debtors have not explained why a targeted search or export of existing complaint information would be unduly burdensome. Further, the Debtors affirmatively relied on the purported absence of prepetition lawsuits and arbitrations to suggest that their customers lacked claims, and the Court expressly identified the absence of evidence concerning potential claims as a concern. The requested complaint records and

governmental correspondences directly bear on whether potential class members hold disputed claims notwithstanding their failure to file individual proofs of claim, the significance of the low claims-filing rate, and the utility of aggregate treatment. The existence of a separate governmental bar date is immaterial because the Class Claimants seek governmental correspondence not to assert claims on behalf of governmental agencies, but as evidence concerning the existence and character of unfiled consumer claims. The Debtors should therefore produce reasonably accessible CRM complaint records or exports, existing complaint summaries, and responsive nonprivileged governmental correspondence.

III. Permission to Supplement the Record and/or a Limited Continuance Is Warranted if Immediate Production Cannot Cure the Prejudice.

20. The Evidentiary Hearing on the Rule 7023 Motion and Class Tolling Motion is scheduled for October 15, 2026, at 10:00 a.m. To the extent the Debtors' delayed production prevents the Class Claimants from meaningfully reviewing and presenting responsive evidence at the Evidentiary Hearing, the Class Claimants respectfully request leave to supplement the evidentiary record following the Evidentiary Hearing, including through the submission of additional documents or testimony as warranted by the production. Such relief would permit the hearing to proceed as scheduled while ensuring that the Class Claimants are not prejudiced by the Debtors' failure to timely produce relevant discovery. In the Informal Supplement, the Debtors acknowledge the existence of responsive engagement data and client-specific complaint records, while continuing to withhold the underlying materials based on generalized objections. Their selective disclosure of favorable information cannot substitute for production of the records necessary to test that information.

Conclusion

WHEREFORE, the Class Claimants respectfully request that the Court enter an order:

(a) granting this Motion and overruling the objections identified above;

(b) directing the Debtors to begin immediate rolling production and substantially complete production of all nonprivileged responsive documents and data by October 22, 2026, at 5:00 p.m. (ET);

(c) permitting personal identifying information (if any) to be produced under attorneys'-eyes-only treatment, by anonymized identifier, or under such other protections as the Court directs, rather than withheld;

(d) requiring the Debtors, for any category as to which the Debtors contend no responsive documents exist, to identify the custodians and systems searched and certify that conclusion after a reasonable inquiry;

(e) granting the Class Claimants leave to supplement the evidentiary record following the October 15, 2026 hearing, including by submitting additional documents or testimony as warranted by the Debtors' production;

(f) awarding the Class Claimants their reasonable expenses under Civil Rule 37(a)(5); and

(g) granting such other and further relief as the Court deems just and proper.

Dated: October 14, 2026

Respectfully submitted,

PACK LAW
4649 Ponce de Leon Boulevard, Suite 405
Coral Gables, Florida 33146
Telephone: (305) 916-4500

By: */s/ Jessey J. Krehl*
Joseph A. Pack
Email: joe@packlaw.com
Florida Bar No. 117882
Jessey J. Krehl
Email: jessey@packlaw.com
Florida Bar No. 1025848

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused a true and correct copy of the foregoing materials to be served via CM/ECF to all parties registered to receive electronic notice thereby on October 14, 2026.

By: */s/ Jessey J. Krehl*

Jessey J. Krehl
Email: jessey@packlaw.com
Florida Bar No. 1025848

Exhibit A

Putative Class Claimants' First Requests for the Production of Documents to the Debtors (served October 6, 2026)

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION
www.flmb.uscourts.gov

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TRAJECTOR MEDIA SERVICES, LLC,	Case No. 3:26-bk-03301-JAB
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TRAJECTOR DISABILITY, LLC,	Case No. 3:26-bk-03308-JAB
CONTACT CENTER 1, LLC,	Case No. 3:26-bk-03309-JAB
BENEFITS KARMA, LLC,	Case No. 3:26-bk-03310-JAB
EXECUTIVE STAFFING SOLUTIONS, PLLC,	Case No. 3:26-bk-03311-JAB
AMPRY HOLDINGS, LLC,	Case No. 3:26-bk-03312-JAB
CONCIERGE STAFFING SERVICE MANAGEMENT, LLC,	Case No. 3:26-bk-03314-JAB
TRAJECTOR, INC.,	Case No. 3:26-bk-03315-JAB
Debtors.	

[1] The Debtors' mailing address is 5950 NW 1st Place, Suite 200, Gainesville, FL 32607. The last four digits of each Debtor's federal tax identification number are: (i) Trajector Holdings, LLC (7528); (ii) Benefits Group Holdings, LLC (2029); (iii) Trajector Medical, LLC (5243); (iv) Infinite IP LLC (3723); (v) Perfect Path, LLC (3494); (vi) Trajector Admin Services, LLC (2231); (vii) Benefits Insurance, LLC (9835); (viii) Myler Insurance Services Holdings, LLC (3606); (ix) AnchorSix Services, LLC (5009); (x) Atvantage, LLC (7384); (xi) Trajector Media Services, LLC (7509); (xii) Globaltek BPO LLC (1684); (xiii) Myler Disability Holdings, LLC (9924); (xiv) Myler Disability, LLC (0845); (xv) Adduco Media, LLC (0257); (xvi) Trajector Disability, LLC (5136); (xvii) Contact Center 1, LLC (2329); (xviii) Benefits Karma, LLC (1850); (xix) Executive Staffing Solutions, PLLC (1841); (xx) Ampry Holdings, LLC (2323); (xxi) Concierge Staffing Service Management, LLC (2814); and (xxii) Trajector, Inc. (2128).

PUTATIVE CLASS CLAIMANTS' FIRST REQUESTS FOR THE PRODUCTION OF DOCUMENTS TO THE DEBTORS

Pursuant to Rules 7026 and 7034 of the Federal Rules of Bankruptcy Procedure, which make applicable Rules 26 and 34 of the Federal Rules of Civil Procedure to this contested matter under Federal Rule of Bankruptcy Procedure 9014(c), and Local Rules 7026-1 and 7037-1 of the United States Bankruptcy Court for the Middle District of Florida, Gilbert Quijada, Jr., Jeffrey Phillips, and Kimberly Phillips (collectively, the "**Class Claimants**"), by and through undersigned counsel, serve the following requests for the production of documents ("**Requests**") on the above-captioned debtors and debtors in possession in connection with the Rule 7023 Motion and the Debtors' Response. The Debtors must answer each Request separately and fully in writing and produce all responsive Documents, together with a privilege log of any Documents withheld, by October 8, 2026.

DEFINITIONS

1. **"Debtors"** means, individually and collectively, each debtor and debtor in possession identified in the caption, including Trajector Holdings, LLC, Trajector Medical, LLC, Trajector, Inc., and their respective present and former officers, directors, members, managers, employees, agents, representatives, consultants, advisors, accountants, restructuring professionals, claims and noticing agents, and attorneys acting on their behalf, including Verita and Carlton Fields, P.A.

2. **"Rule 7023 Motion"** means the *Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* [Dkt. No. 234), including all exhibits and declarations filed in support of it.

3. **"Response"** means the *Debtors' Response in Opposition to Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* [Dkt. No. 254], including its exhibits and any argument incorporated from the Debtors' omnibus response to the motions concerning the Claims Bar Date [Dkt. No. 253].

4. **"Class Actions"** means, collectively, (a] Baker, et al. v. Trajector Medical, LLC (f/k/a Vet Comp & Pen Medical Consulting, LLC], Case No. 1:26-cv-00099 (N.D. Fla.), and (b) Quijada, Jr., et al. v. Trajector, Inc. and Trajector Medical, LLC (f/k/a Vet Comp and Pen Medical Consulting, LLC), Case No. 1:26-cv-00150-MW-MJF (N.D. Fla.).

5. **"Putative Classes"** means the nationwide and California classes of veterans and eligible dependent spouses described in the Rule 7023 Motion and the Class Complaint attached to it.

6. **"Cover Letters"** means the Trajector Medical Cover Letter and the Trajector Disability Cover Letter described in the Response and attached to it as Exhibits A and B, including every draft and version of those letters.

7. **"Bar Date Notice"** means the Notice of Chapter 11 Bankruptcy Case filed at Doc. 90, together with the proof-of-claim form and any transmittal materials served with it.

8. **"Verita"** means Kurtzman Carson Consultants, LLC d/b/a Verita Global, the Debtors' notice, claims, and solicitation agent.

9. **"Client Service Agreement"** means any agreement, terms of service, addendum, amendment, or other contract governing services provided by any Debtor to a veteran or eligible dependent spouse, including every version used from March 1, 2022 through the Petition Date.

10. **"Petition Date"** means July 23, 2026.

11. **"Claims Bar Date"** means October 1, 2026, as originally established, and any extension or tolling of that date.

12. **"Current Date"** means the date of the Debtors' response to these Requests.

13. **"Document"** is synonymous in meaning and equal in scope to its usage in Federal Rule of Civil Procedure 34(a)(1)(A), as incorporated by Federal Rule of Bankruptcy Procedure 7034, and includes all writings, electronically stored information, drawings, graphs, charts, photographs, sound recordings, images, databases, structured data, emails, text messages, collaboration-platform messages, and other data or data compilations stored in any medium, as well as tangible things. A draft or non-identical copy is a separate Document. The term includes any Document now or at any time in the Debtors' possession, custody, or control.

14. **"Communication"** means any transmission of information or data in any form, whether written, oral, or electronic.

15. **"Person"** means any natural person or legal entity, including any business, governmental entity, organization, or association.

16. **"Relate to," "relating to," "concern," or "concerning"** means consisting of, referring to, reflecting, evidencing, describing, analyzing, supporting, contradicting, or being logically or factually connected with the matter discussed.

17. The terms "**and**" and "**or**" shall be construed either conjunctively or disjunctively as necessary to bring within the scope of a request all responses that might otherwise fall outside its scope. "**All**," "**any**," and "**each**" encompass any and all of the matter discussed. The singular includes the plural and vice versa, and the present tense includes the past tense and vice versa.

INSTRUCTIONS

1. These requests are governed by Federal Rules of Bankruptcy Procedure 7026 and 7034 and the corresponding Federal Rules of Civil Procedure, as applied to this contested matter by Federal Rule of Bankruptcy Procedure 9014(c).

2. The Debtors must serve written responses, signed by counsel, and produce all responsive Documents by October 8, 2026.

3. Unless a request states otherwise, the relevant time period is March 1, 2022 through the Current Date.

4. Each request calls for all responsive Documents in the Debtors' possession, custody, or control, including Documents held by their agents, employees, representatives, consultants, advisors, accountants, restructuring professionals, claims or noticing agents, or attorneys, without regard to physical location.

5. Documents shall be produced as they are kept in the usual course of business, with labels, folder structure, and file names intact, or organized and labeled to correspond to the numbered requests. Electronically stored information shall be produced in native format with accompanying metadata or in another reasonably usable form agreed by the parties. Spreadsheets, databases, and structured data shall be produced in native format or as delimited data with field definitions sufficient to understand and use the production.

6. Email and other message productions shall preserve parent-child relationships and include attachments. If the Debtors deduplicate Documents, they shall preserve all custodian information and produce it in a load file or other reasonably usable form.

7. If a responsive Document once existed but is no longer in the Debtors' possession, custody, or control, identify the type of Document, its date, author and recipients, its subject matter, its last known custodian and location, and the circumstances and date of its loss, destruction, deletion, or transfer.

8. If the Debtors withhold or redact any Document, Communication, attachment, or information based on privilege or other protection, they shall serve with their written responses a document-by-document privilege log that complies with Federal Rule of Civil Procedure 26(b)(5). For each withheld or redacted item, the log shall identify a unique document identifier or Bates range, date, document type, author, every recipient and copy recipient, each person's role, the general subject matter, the specific privilege or protection asserted, and the basis for the claim in sufficient detail to assess it. Attachments shall be assessed and logged separately from transmitting Communications, and all reasonably segregable non-privileged portions shall be produced.

9. For each request, state whether responsive Documents are being withheld based on an objection. If no responsive Documents exist, state that fact after a reasonable search.

10. These requests are continuing. The Debtors must promptly supplement their responses in accordance with Federal Rule of Civil Procedure 26(e) if they learn that a response is incomplete or incorrect.

REQUESTS FOR THE PRODUCTION OF DOCUMENTS

1. All Documents relating to or supporting the Debtors' assertion that the Class Actions "had little to do with the Debtors' determination to file bankruptcy" (Response ¶ 45), including board materials, restructuring presentations, liability analyses, communications with lenders or potential transaction counterparties, and materials concerning the effect of the

Class Actions or potential class certification on the timing or decision to commence these Chapter 11 Cases.

2. Documents and data sufficient to identify each Person within any Putative Classes, including name, state of residence, applicable Client Service Agreement version, amounts paid, amounts invoiced, and amounts claimed to remain outstanding.

3. All versions of Client Service Agreements used from March 1, 2022 through the Petition Date, together with Documents sufficient to show the dates each version was used, the number of clients subject to each version, and the executed agreements and assent records for Gilbert Quijada, Jr., Jeffrey Phillips, and Kimberly Phillips..

4. Documents and data sufficient to show (a) the criteria used to select recipients of the Bar Date Notice and service packages; (b) the number and identity of recipients served; (c) the method and date of service; and (d) any failed, bounced, returned, or undeliverable service and subsequent attempts.

5. All drafts of, comments on, and Communications concerning the Cover Letters, including Communications with Verita concerning their content, readability, wording, formatting, intended audience, or likely effect on recipients.

6. All Documents concerning the decision to include language in the Trajector Medical Cover Letter stating that unpaid amounts remained due and payable, and the decision not to identify the Class Actions, prior entity names, specific Debtor entities, or the types of potential claims held by veterans or dependent spouses.

7. All Documents reflecting or analyzing recipient engagement with the Bar Date Notice, Cover Letters, proof-of-claim form, or Verita website, including email open or click data, website analytics, telephone logs, inquiries, complaints, and requests for assistance.

8. All Documents supporting the contention that a low rate of claims filed by clients is consistent with recipients reviewing the notice and determining that they do not have claims against the Debtors. Response ¶ 51.

9. All Documents concerning Communications with any current or former client, from the Petition Date through the Claims Bar Date, about whether the client had a claim against a Debtor, whether the client should file a proof of claim, or the effect of filing a proof of claim on an outstanding balance.

10. Documents sufficient to support the Debtors' assertions that application of Rule 7023 would materially increase administrative expense, delay or interfere with these Chapter 11 Cases, reduce creditor recoveries, or result in de minimis recoveries for members of the Putative Classes, including any budgets, estimates, models, or analyses quantifying such effects.

11. Documents sufficient to identify and summarize complaints, claims, lawsuits, arbitrations, and governmental or regulatory inquiries or actions concerning the Debtors' services to veterans, VA accreditation, fees, billing, or collection practices, including any existing

complaint trackers, summaries, reports, or final agency correspondence, and further including all Communications from any federal, state, or local governmental or regulatory authority, including any state attorney general, the United States Department of Veterans Affairs, the VA Office of General Counsel, the VA Office of Inspector General, the Federal Trade Commission, or the Consumer Financial Protection Bureau, concerning a Debtor's advertising, contracting, provision of services to veterans or dependent spouses, VA accreditation, fees, billing, collections, or related business practices.

12. All Documents not otherwise produced that the Debtors intend to introduce, cite, or rely upon at the evidentiary hearing on the Rule 7023 Motion.

Dated: October 6, 2026

Respectfully submitted,

PACK LAW
4649 Ponce de Leon Boulevard, Suite 405
Coral Gables, Florida 33146
Telephone: (305) 916-4500

By: */s/ Jessey J. Krehl*
Joseph A. Pack
Email: joe@packlaw.com
Florida Bar No. 117882
Jessey J. Krehl
Email: jessey@packlaw.com
Florida Bar No. 1025848
Katelyn A. Garciga
Florida Bar No. 1058474
Counsel for the Putative Class Claimants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 6, 2026, I caused a true and correct copy of the foregoing materials to be served via electronic mail on Edward J. Peterson, Esq. (epeterson@bergersingerman.com), Jordi Guso, Esq. (jguso@bergersingerman.com), and Clay B. Roberts, Esq. (croberts@bergersingerman.com).

By: */s/ Jessey J. Krehl*
Jessey J. Krehl
Florida Bar No. 1025848

Exhibit B

Debtors' Response to Putative Class Claimants' First Requests for the Production of Documents (served October 8, 2026)

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION
www.flmb.uscourts.gov

IN RE:	Chapter 11 Cases
TRAJECTOR HOLDINGS, LLC, [1]	Case No. 3:26-bk-03286-JAB Lead Case
	Jointly Administered with
BENEFITS GROUP HOLDINGS, LLC,	Case No. 3:26-bk-03289-JAB
TRAJECTOR MEDICAL, LLC,	Case No. 3:26-bk-03291-JAB
INFINITE IP LLC,	Case No. 3:26-bk-03293-JAB
PERFECT PATH, LLC,	Case No. 3:26-bk-03295-JAB
TRAJECTOR ADMIN SERVICES, LLC,	Case No. 3:26-bk-03296-JAB
BENEFITS INSURANCE, LLC,	Case No. 3:26-bk-03297-JAB
MYLER INSURANCE SERVICES HOLDINGS, LLC,	Case No. 3:26-bk-03298-JAB
ANCHORSIX SERVICES, LLC,	Case No. 3:26-bk-03299-JAB
ATVANTAGE, LLC,	Case No. 3:26-bk-03300-JAB
TRAJECTOR MEDIA SERVICES, LLC,	Case No. 3:26-bk-03301-JAB
GLOBALTEK BPO LLC,	Case No. 3:26-bk-03302-JAB
MYLER DISABILITY HOLDINGS, LLC,	Case No. 3:26-bk-03304-JAB
MYLER DISABILITY, LLC,	Case No. 3:26-bk-03306-JAB
ADDUCO MEDIA, LLC,	Case No. 3:26-bk-03307-JAB
TRAJECTOR DISABILITY, LLC,	Case No. 3:26-bk-03308-JAB
CONTACT CENTER 1, LLC,	Case No. 3:26-bk-03309-JAB
BENEFITS KARMA, LLC,	Case No. 3:26-bk-03310-JAB
EXECUTIVE STAFFING SOLUTIONS, PLLC,	Case No. 3:26-bk-03311-JAB
AMPRY HOLDINGS, LLC,	Case No. 3:26-bk-03312-JAB
CONCIERGE STAFFING SERVICE MANAGEMENT, LLC,	Case No. 3:26-bk-03314-JAB
TRAJECTOR, INC.,	Case No. 3:26-bk-03315-JAB
Debtors.	

_____/

[1] The Debtors' mailing address is 5950 NW 1st Place, Suite 200, Gainesville, FL 32607. The last four digits of each Debtor's federal tax identification number are: (i) Trajector Holdings, LLC (7528); (ii) Benefits Group Holdings, LLC (2029); (iii) Trajector Medical, LLC (5243); (iv) Infinite IP LLC (3723); (v) Perfect Path, LLC (3494); (vi) Trajector Admin Services, LLC (2231); (vii) Benefits Insurance, LLC (9835); (viii) Myler Insurance Services Holdings, LLC (3606); (ix) AnchorSix Services, LLC (5009); (x) Atvantage, LLC (7384); (xi) Trajector Media Services, LLC (7509); (xii) Globaltek BPO LLC (1684); (xiii) Myler Disability Holdings, LLC (9924); (xiv) Myler Disability, LLC (0845); (xv) Adduco Media, LLC (0257); (xvi) Trajector Disability, LLC (5136); (xvii) Contact Center 1, LLC (2329); (xviii) Benefits Karma, LLC (1850); (xix) Executive Staffing Solutions, PLLC (1841); (xx) Ampry Holdings, LLC (2323); (xxi) Concierge Staffing Service Management, LLC (2814); and (xxii) Trajector, Inc. (2128).

DEBTORS' RESPONSE TO PUTATIVE CLASS CLAIMANTS' FIRST REQUESTS FOR THE PRODUCTION OF DOCUMENTS

The above-captioned Debtors (collectively, the "Debtors"), by and through their undersigned counsel, respond to Gilbert Quijada Jr., Jeffrey Phillips, and Kimberly Phillips (collectively, the "Putative Class Claimants") First Requests for Production of Documents to the Debtors (the "Request"). In responding to the Request (and unless stated otherwise), Debtors adopt and incorporate the Definitions set forth in the Request, and such defined terms shall have the same meaning herein as that set forth in the Request.

DOCUMENT REQUESTS

1. All Documents relating to or supporting the Debtors' assertion that the Class Actions "had little to do with the Debtors' determination to file bankruptcy" (Response at ¶ 45), including board materials, restructuring presentations, liability analyses, communications with lenders or potential transaction counterparties, and materials concerning the effect of the Class Actions or potential class certification on the timing or decision to commence these Chapter 11 Cases.

RESPONSE: Debtors object to Request Number 1 on the grounds that it seeks documents protected by the attorney-client privilege and/or work-product doctrine; however, the record which is equally available to the Putative Class Claimants includes the *Declaration of Mark C. Healy in Support of Chapter 11 Petitions and First Day Relief* which sets forth the reasons the Debtors filed for bankruptcy protection. (Doc. 39 at ¶¶ 42-77).

Debtors also object to Request Number 1 on the grounds that it seeks documents that are not: (a) relevant to a claim or defense; and (b) proportional to the needs of the case, considering: (1) the parties' relative access to relevant information; (2) the parties' resources; (3) the importance of the discovery in resolving the issues; and (4) whether the burden or expense of the proposed discovery outweighs its likely benefit. To be clear, the documents requested are irrelevant to the issues raised in: (a) *Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* (Doc. 234), that is, whether the Bankruptcy Court should apply Fed. R. Bankr. P. 7023 to the putative class claims; and (b) *Debtors' Response in Opposition to Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* (Doc. 254), that is, whether the: (1) request for application of Bankruptcy Rule 7023 is

premature; and (2) putative class claims are all subject to arbitration, the Putative Class Claimants have waived the right to participate in a class action (or both).

2. Documents and data sufficient to identify each Person within any Putative Classes, including name, state of residence, applicable Client Service Agreement version, amounts paid, amounts invoiced, and amounts claimed to remain outstanding.

RESPONSE: Debtors object to Request Number 2 on the grounds that the request is unduly burdensome. The Putative Class Claimants served the Request on the Debtors on October 6, 2026, with response deadline of October 8, 2026. Request Number 2 concerns approximately 129,068 individuals who might be putative class members. Debtors do not maintain a list; even if they did, the Court has authorized Debtors to suppress (*i.e.*, not publish) the: (a) names; (b) mailing addresses; and (c) e-mail addresses of Debtors' individual creditors and real parties in interest. (Doc. 150 at ¶ 4).

Debtors also object to Request Number 2 on the grounds that it seeks documents that are not: (a) relevant to a claim or defense; and (b) proportional to the needs of the case, considering: (1) the parties' relative access to relevant information; (2) the parties' resources; (3) the importance of the discovery in resolving the issues; and (4) whether the burden or expense of the proposed discovery outweighs its likely benefit. To be clear, the documents requested are irrelevant to the issues raised in: (a) *Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* (Doc. 234), that is, whether the Bankruptcy Court should apply Fed. R. Bankr. P. 7023 to the putative class claims; and (b) *Debtors' Response in Opposition to Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* (Doc. 254), that is, whether the: (1) request for application of Bankruptcy Rule 7023 is premature; and (2) putative class claims are all subject to arbitration, the Putative Class Claimants have waived the right to participate in a class action (or both).

3. All versions of Client Service Agreements used from March 1, 2022 through the Petition Date, together with Documents sufficient to show the dates each version was used, the number of clients subject to each version, and the executed agreements and assent records for Gilbert Quijada, Jr., Jeffrey Phillips, and Kimberly Phillips.

RESPONSE: Debtors object to Request Number 3 on the grounds that it is overbroad and unduly burdensome. Identifying the number of clients subject to each version would be a Herculean task since there are approximately 129,068 clients or former clients (particularly when the production deadline is October 8, 2026).

Debtors: (a) provide the following non-objectionable response; and (b) will produce the following non-privileged/non-objectionable documents responsive to Request Number 3:

No Client Service Agreement exists between any of the Debtors and Kimberly Phillips ("Ms. Phillips") because she was never a client of any of the Debtors. Instead, Ms. Phillips attempts to assert claims through her husband, Jeffrey Phillips, who (unlike Ms. Phillips) was a Trajector Medical client.

Debtors will produce four (4) versions (with each new version replacing the prior one) of the Client Service Agreement used from March 1, 2022 through the Petition Date (with the files reflecting the start date for each version). Moreover, Debtors already provided the Client Service Agreements to the Putative Class Claimants executed by Jeffrey Phillips and Gilbert Quijada, Jr. as Exhibit C and Exhibit D to the *Debtors' Response in Opposition to Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* (Doc. 254), respectively.

4. Documents and data sufficient to show (a) the criteria used to select recipients of the Bar Date Notice and service packages; (b) the number and identity of recipients served; (c) the method and date of service; and (d) any failed, bounced, returned, or undeliverable service and subsequent attempts.

RESPONSE: Debtors object to Request Number 4 on the grounds that it seeks documents protected by the attorney-client privilege and/or work-product doctrine. Debtors also object to Request Number 4 object on the grounds that the Court has authorized Debtors to suppress (*i.e.*, not publish) the: (a) names; (b) mailing addresses; and (c) e-mail addresses of Debtors' individual creditors and real parties in interest. (Doc. 150 at ¶ 4).

Debtors also object to Request Number 4 on the grounds that it seeks documents that are not: (a) relevant to a claim or defense; and (b) proportional to the needs of the case, considering: (1) the parties' relative access to relevant information; (2) the parties' resources; (3) the importance of the discovery in resolving the issues; and (4) whether the burden or expense of the proposed discovery outweighs its likely benefit. To be clear, the documents requested are irrelevant to the issues raised in: (a) *Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* (Doc. 234), that is, whether the Bankruptcy Court should apply Fed. R. Bankr. P. 7023 to the putative class claims; and (b) *Debtors' Response in Opposition to Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* (Doc. 254), that is, whether the: (1) request for application of Bankruptcy Rule 7023 is premature; and (2) putative class claims are all subject to arbitration, the Putative Class Claimants have waived the right to participate in a class action (or both).

Finally, Debtors refer Putative Class Claimants to the Certificates of Service for Trajector Medical clients identified in paragraph 10 of *Debtors' Response in Opposition to Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* (Doc. 254): (Doc. 112, 114, 168, 205, 230.

5. All drafts of, comments on, and Communications concerning the Cover Letters, including Communications with Verita concerning their content, readability, wording, formatting, intended audience, or likely effect on recipients.

RESPONSE: Debtors object to Request Number 5 on the grounds that it seeks documents protected by the attorney-client privilege and/or work-product doctrine.

Debtors also object to Request Number 5 on the grounds that it seeks documents that are not: (a) relevant to a claim or defense; and (b) proportional to the needs of the case, considering: (1) the parties' relative access to relevant information; (2) the parties' resources; (3) the importance of the discovery in resolving the issues; and (4) whether the burden or expense of the proposed discovery outweighs its likely benefit. To be clear, the documents requested are irrelevant to the issues raised in: (a) *Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* (Doc. 234), that is, whether the Bankruptcy Court should apply Fed. R. Bankr. P. 7023 to the putative class claims; and (b) *Debtors' Response in Opposition to Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* (Doc. 254), that is, whether the: (1) request for application of Bankruptcy Rule 7023 is premature; and (2) putative class claims are all subject to arbitration, the Putative Class Claimants have waived the right to participate in a class action (or both).

6. All Documents concerning the decision to include language in the Trajector Medical Cover Letter stating that unpaid amounts remained due and payable, and the decision not to identify the Class Actions, prior entity names, specific Debtor entities, or the types of potential claims held by veterans or dependent spouses.

RESPONSE: Debtors object to Request Number 6 on the grounds that it seeks documents protected by the attorney-client privilege and/or work-product doctrine.

Debtors also object to Request Number 6 on the grounds that it seeks documents that are not: (a) relevant to a claim or defense; and (b) proportional to the needs of the case, considering: (1) the parties' relative access to relevant information; (2) the parties' resources; (3) the importance of the discovery in resolving the issues; and (4) whether the burden or expense of the proposed discovery outweighs its likely benefit. To be clear, the documents requested are irrelevant to the issues raised in: (a) *Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* (Doc. 234), that is, whether the Bankruptcy Court should apply Fed. R. Bankr. P. 7023 to the putative class claims; and (b) *Debtors' Response in Opposition to Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* (Doc. 254), that is, whether the: (1) request for application of Bankruptcy Rule 7023 is

premature; and (2) putative class claims are all subject to arbitration, the Putative Class Claimants have waived the right to participate in a class action (or both).

7. All Documents reflecting or analyzing recipient engagement with the Bar Date Notice, Cover Letters, proof-of-claim form, or Verita website, including email open or click data, website analytics, telephone logs, inquiries, complaints, and requests for assistance.

RESPONSE: **Debtors object to Request Number 7 on the grounds that it seeks documents protected by the attorney-client privilege and/or work-product doctrine.**

Debtors also object to Request Number 7 on the grounds that it seeks documents that are not: (a) relevant to a claim or defense; and (b) proportional to the needs of the case, considering: (1) the parties' relative access to relevant information; (2) the parties' resources; (3) the importance of the discovery in resolving the issues; and (4) whether the burden or expense of the proposed discovery outweighs its likely benefit. To be clear, the documents requested are irrelevant to the issues raised in: (a) *Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* (Doc. 234), that is, whether the Bankruptcy Court should apply Fed. R. Bankr. P. 7023 to the putative class claims; and (b) *Debtors' Response in Opposition to Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* (Doc. 254), that is, whether the: (1) request for application of Bankruptcy Rule 7023 is premature; and (2) putative class claims are all subject to arbitration, the Putative Class Claimants have waived the right to participate in a class action (or both).

Debtors will produce the following non-privileged/non-objectionable documents responsive to Request Number 7: a Veritas call log reflecting communications with certain putative class members (with clients' or former clients' names and other personal identifiable information redacted per the Court's Order (Doc. 154).

8. All Documents supporting the contention that a low rate of claims filed by clients is consistent with recipients reviewing the notice and determining that they do not have claims against the Debtors. Response ¶ 51.

RESPONSE: Debtors object to Request Number 8 on the grounds that it seeks documents protected by the attorney client privilege and/or work product doctrine.

Debtors also object to Request Number 8 on the grounds that it seeks documents that are not: (a) relevant to a claim or defense; and (b) proportional to the needs of the case, considering: (1) the parties' relative access to relevant information; (2) the parties' resources; (3) the importance of the discovery in resolving the issues; and (4) whether the burden or expense of the proposed discovery outweighs its likely benefit. To be clear, the documents requested are irrelevant to the issues raised in: (a) *Putative Class Claimants'*

***Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* (Doc. 234), that is, whether the Bankruptcy Court should apply Fed. R. Bankr. P. 7023 to the putative class claims; and (b) *Debtors' Response in Opposition to Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* (Doc. 254), that is, whether the: (1) request for application of Bankruptcy Rule 7023 is premature; and (2) putative class claims are all subject to arbitration, the Putative Class Claimants have waived the right to participate in a class action (or both).**

9. All Documents concerning Communications with any current or former client, from the Petition Date through the Claims Bar Date, about whether the client had a claim against a Debtor, whether the client should file a proof of claim, or the effect of filing a proof of claim on an outstanding balance.

RESPONSE: Debtors object to Request Number 9 on the grounds that it seeks documents that are not: (a) relevant to a claim or defense; and (b) proportional to the needs of the case, considering: (1) the parties' relative access to relevant information; (2) the parties' resources; (3) the importance of the discovery in resolving the issues; and (4) whether the burden or expense of the proposed discovery outweighs its likely benefit. To be clear, the documents requested are irrelevant to the issues raised in: (a) *Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* (Doc. 234), that is, whether the Bankruptcy Court should apply Fed. R. Bankr. P. 7023 to the putative class claims; and (b) *Debtors' Response in Opposition to Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* (Doc. 254), that is, whether the: (1) request for application of Bankruptcy Rule 7023 is premature; and (2) putative class claims are all subject to arbitration, the Putative Class Claimants have waived the right to participate in a class action (or both).

Debtors: (a) provide the following non-objectionable response; and (b) will produce the following non-privileged/non-objectionable documents responsive to Request Number 9:

Debtors have already produced the: (a) Trajector Medical Cover Letter; and (b) Trajector Disability Cover Letter as Exhibit A and Exhibit B, respectively (attached to and as defined in Paragraph 11 of *Debtors' Response in Opposition to Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* (Doc. 254). Debtors will produce a Veritas call log reflecting communications with certain putative class members (with the clients' or former clients' names and other personal identifiable information redacted consistent with a the Court's Order (Doc. No. 150 at ¶ 4).

10. Documents sufficient to support the Debtors' assertions that application of Rule 7023 would materially increase administrative expense, delay or interfere with these Chapter 11

Cases, reduce creditor recoveries, or result in de minimis recoveries for members of the Putative Classes, including any budgets, estimates, models, or analyses quantifying such effects.

RESPONSE: Debtors object to Request Number 10 on the grounds that that it seeks documents protected by the attorney client privilege and/or work product doctrine.

Debtors also object to Request Number 10 on the grounds that it seeks documents that are not: (a) relevant to a claim or defense; and (b) proportional to the needs of the case, considering: (1) the parties' relative access to relevant information; (2) the parties' resources; (3) the importance of the discovery in resolving the issues; and (4) whether the burden or expense of the proposed discovery outweighs its likely benefit. To be clear, the documents requested are irrelevant to the issues raised in: (a) *Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* (Doc. 234), that is, whether the Bankruptcy Court should apply Fed. R. Bankr. P. 7023 to the putative class claims; and (b) *Debtors' Response in Opposition to Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* (Doc. 254), that is, whether the: (1) request for application of Bankruptcy Rule 7023 is premature; and (2) putative class claims are all subject to arbitration, the Putative Class Claimants have waived the right to participate in a class action (or both).

Debtors provide the following non-objectionable response to Request Number 10:

Please see the record, including: (a) *Declaration of Mark C. Healy in Support of Chapter 11 Petitions and First Day Relief* (which sets forth the reasons the Debtors filed for bankruptcy protection) (Doc. 39 at ¶¶ 42-77); and (b) the most recent cash collateral budget for the period of September 24, 2026 through December 3, 2026. (Doc. 255).

11. Documents sufficient to identify and summarize complaints, claims, lawsuits, arbitrations, and governmental or regulatory inquiries or actions concerning the Debtors' services to veterans, VA accreditation, fees, billing, or collection practices, including any existing complaint trackers, summaries, reports, or final agency correspondence, and further including all Communications from any federal, state, or local governmental or regulatory authority, including any state attorney general, the United States Department of Veterans Affairs, the VA Office of General Counsel, the VA Office of Inspector General, the Federal Trade Commission, or the Consumer Financial Protection Bureau, concerning a Debtor's advertising, contracting, provision

of services to veterans or dependent spouses, VA accreditation, fees, billing, collections, or related business practices.

RESPONSE: Debtors object to Request Number 11 on the grounds that it seeks documents protected by the attorney-client privilege and/or work-product doctrine.

Debtors also object to Request Number 11 on the grounds that it seeks documents that are not: (a) relevant to a claim or defense; and (b) proportional to the needs of the case, considering: (1) the parties' relative access to relevant information; (2) the parties' resources; (3) the importance of the discovery in resolving the issues; and (4) whether the burden or expense of the proposed discovery outweighs its likely benefit. To be clear, the documents requested are irrelevant to the issues raised in: (a) *Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* (Doc. 234), that is, whether the Bankruptcy Court should apply Fed. R. Bankr. P. 7023 to the putative class claims; and (b) *Debtors' Response in Opposition to Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* (Doc. 254), that is, whether the: (1) request for application of Bankruptcy Rule 7023 is premature; and (2) putative class claims are all subject to arbitration, the Putative Class Claimants have waived the right to participate in a class action (or both).

Debtors provide the following non-objectionable response to Request Number 11:

Please see the record, including, but not limited to the Complaint commencing the Quijada class action attached as Exhibit A to *Putative Class Claimants' Motion for the Application of Bankruptcy Rule 7023 and for Leave to File Class Proofs of Claim* (Doc. 234). Debtors will produce the Complaint commencing the Baker class action.

12. All Documents not otherwise produced that the Debtors intend to introduce, cite, or rely upon at the evidentiary hearing on the Rule 7023 Motion.

RESPONSE: Debtors object to Request Number 12 on the grounds that it is premature.

Debtors also object to Request Number 12 on the grounds that it seeks documents protected by the: (a) attorney/client privilege; and (b) work-product doctrine.

Debtors provide the following non-objectionable response to Request Number 12:

Debtors will produce the documents that it will use as exhibits at the hearing on the Rule 723 Motion in connection with the Court's Order Scheduling Evidentiary Hearing (Doc. 287).

Dated: October 8, 2026.

/s/ Edward J. Peterson
Edward J. Peterson
Florida Bar No. 14612
BERGER SINGERMAN LLP
101 E. Kennedy Boulevard, Suite 1165
Tampa, FL 33602
813.498.3400
epeterson@bergersingerman.com
-and-

Jordi Guso
Florida Bar No. 863580
jguso@bergersingerman.com
Clay B. Roberts
Florida Bar No. 116058
croberts@bergersingerman.com
1450 Brickell Avenue, Ste. 1900
Miami, FL 33131
Telephone: (305) 755-9500
Facsimile: (305) 714-4340

Counsel for the Debtors

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via electronic mail on October 8, 2026, upon the following:

Joseph A. Pack
joe@packlaw.com

Jessey J. Krehl
jessey@packlaw.com

Katelyn A. Garciga
katelyn@packlaw.com

/s/ Edward J. Peterson
Edward J. Peterson

Exhibit C

Debtors' Informal Supplement to Discovery Responses
(October 13, 2026 Email Correspondence)

Outlook

RE: Trajector Holdings, Inc., Case No. 3:26-BK-03286-JAB -

From Clay B. Roberts <CRoberts@bergersingerman.com>

Date Tue 10/13/2026 6:30 PM

To Jessey Krehl <jessey@packlaw.com>; Edward J. Peterson III <EPeterson@bergersingerman.com>; Jordi Guso <JGuso@bergersingerman.com>; Paula Castro <pcastro@bergersingerman.com>; Kerry Burns <KBurns@bergersingerman.com>; Marc L. Levine <mlevine@bergersingerman.com>; Paul A. Avron <PAvron@bergersingerman.com>

Cc Joseph Pack <joe@packlaw.com>; Lynn Sherman <lynn@packlaw.com>; Katelyn Garciga <katelyn@packlaw.com>; Tanya Yatsco <tanya@packlaw.com>



As to responses on the discovery requests, some are still in progress but we are working through them. Without waiving any objections already made in response to the RFP, please see below.

- Request 3
  - Client service agreements – while we would normally prefer bates stamping, in the interest of time, please see attached. These show the dates in the title when the company began using each contract.

  - Lynn asked about whether a Trajector Medical client with a prior contract would stay under that contract even if there was a later VA increase in benefits after a new contract started being used. My understanding is that in the majority of circumstances, they would stay with the original contract (absent some reason to use a new contract which are done on a case by case basis).

  - As to how many clients use a particular form of agreement, there is no document with that data that exists.

- Request 7
  - On the latest email service of the Amended Bar Date Notice (just completed), I was able to get email open and click data. For the Trajector Medical sent email, 113,001 emails were sent successfully on October 8, 2026. Of those, so far 89.4% opened the email (101,058) and 28.4% clicked on either of the links (32,111). The company also asked

Verita to help with service on certain emails that it was having trouble serving (12,924 emails). Of those, so far 5,040 opened the email and 1,187 clicked either of the links.

- Request 11
  - Regarding a complaint tracker, there is not a complaint tracker utilized across the company. The company utilizes a CRM program and complaints (if any) are tracked on a client-by-client basis. In addition to our previous objections, we also object to this request on relevance as it does not go to any of the Musicland factors/merits of the Rule 7023 Motion as well as burdensomeness.

  - Regarding correspondence with governmental agencies, we object on relevance to the Rule 7023 Motion before the court and burdensomeness grounds. The governmental agencies, whether acting on behalf of themselves or the residents of a state, have a separate governmental bar date.

Clay B Roberts
D: (305) 714-4377 | M: (404) 273-4316
bergersingerman.com

[redacted]

Exhibit D

Proposed Order

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION
www.flmb.uscourts.gov

IN RE:	Chapter 11 Cases
TRAJECTOR HOLDINGS, LLC,[9]	Case No. 3:26-bk-03286-JAB Lead Case
	Jointly Administered with
BENEFITS GROUP HOLDINGS, LLC,	Case No. 3:26-bk-03289-JAB
TRAJECTOR MEDICAL, LLC,	Case No. 3:26-bk-03291-JAB
INFINITE IP LLC,	Case No. 3:26-bk-03293-JAB
PERFECT PATH, LLC,	Case No. 3:26-bk-03295-JAB
TRAJECTOR ADMIN SERVICES, LLC,	Case No. 3:26-bk-03296-JAB
BENEFITS INSURANCE, LLC,	Case No. 3:26-bk-03297-JAB
MYLER INSURANCE SERVICES HOLDINGS, LLC,	Case No. 3:26-bk-03298-JAB
ANCHORSIX SERVICES, LLC,	Case No. 3:26-bk-03299-JAB
ATVANTAGE, LLC,	Case No. 3:26-bk-03300-JAB
TRAJECTOR MEDIA SERVICES, LLC,	Case No. 3:26-bk-03301-JAB
GLOBALTEK BPO LLC,	Case No. 3:26-bk-03302-JAB
MYLER DISABILITY HOLDINGS, LLC,	Case No. 3:26-bk-03304-JAB
MYLER DISABILITY, LLC,	Case No. 3:26-bk-03306-JAB
ADDUCO MEDIA, LLC,	Case No. 3:26-bk-03307-JAB
TRAJECTOR DISABILITY, LLC,	Case No. 3:26-bk-03308-JAB
CONTACT CENTER 1, LLC,	Case No. 3:26-bk-03309-JAB
BENEFITS KARMA, LLC,	Case No. 3:26-bk-03310-JAB
EXECUTIVE STAFFING SOLUTIONS, PLLC,	Case No. 3:26-bk-03311-JAB

[9] The Debtors' mailing address is 5950 NW 1st Place, Suite 200, Gainesville, FL 32607. The last four digits of each Debtor's federal tax identification number are: (i) Trajector Holdings, LLC (7528); (ii) Benefits Group Holdings, LLC (2029); (iii) Trajector Medical, LLC (5243); (iv) Infinite IP LLC (3723); (v) Perfect Path, LLC (3494); (vi) Trajector Admin Services, LLC (2231); (vii) Benefits Insurance, LLC (9835); (viii) Myler Insurance Services Holdings, LLC (3606); (ix) AnchorSix Services, LLC (5009); (x) Atvantage, LLC (7384); (xi) Trajector Media Services, LLC (7509); (xii) Globaltek BPO LLC (1684); (xiii) Myler Disability Holdings, LLC (9924); (xiv) Myler Disability, LLC (0845); (xv) Adduco Media, LLC (0257); (xvi) Trajector Disability, LLC (5136); (xvii) Contact Center 1, LLC (2329); (xviii) Benefits Karma, LLC (1850); (xix) Executive Staffing Solutions, PLLC (1841); (xx) Ampry Holdings, LLC (2323); (xxi) Concierge Staffing Service Management, LLC (2814); and (xxii) Trajector, Inc. (2128).

AMPRY HOLDINGS, LLC, CONCIERGE STAFFING SERVICE MANAGEMENT, LLC, TRAJECTOR, INC., Debtors.	Case No. 3:26-bk-03312-JAB Case No. 3:26-bk-03314-JAB Case No. 3:26-bk-03315-JAB

ORDER GRANTING
PUTATIVE CLASS CLAIMANTS' *EMERGENCY* MOTION TO COMPEL DOCUMENT PRODUCTION AND REQUEST FOR EXPEDITED CONSIDERATION

THIS MATTER came before the Court on October __, 2026, on the *Putative Class Claimants' Emergency Motion to Compel Document Production and Request for Expedited Consideration* [Dkt. No. [___]] (the "**Motion**"). Having considered the Motion, the record, and the statements of counsel, and being otherwise fully advised, it is

ORDERED:

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

2. On or before October 22, 2026, at 5:00 p.m. (ET), the Debtors shall serve supplemental written responses to the *Putative Class Claimants' First Requests for Production* Nos. 3, 7, and 11. Each response shall state whether responsive material is being withheld on the basis of each objection.

3. The Debtors shall begin immediate rolling production and, by the deadline in paragraph 2, substantially complete production of all nonprivileged responsive documents and data. Without limiting the foregoing, the Debtors shall produce the nonprivileged materials and the narrower data and document categories identified in the Motion for Requests Nos. 3, 7, and 11.

4. By the same deadline, the Debtors shall serve a privilege log compliant with Federal Rule of Civil Procedure 26(b)(5)(A), identifying each document or communication withheld or redacted on the basis of privilege or work-product protection.

5. The Debtors may designate personal identifying information as attorneys' eyes only or use anonymized identifiers, provided the production preserves the fields and relationships needed to analyze the responsive documents. Nothing in this Order authorizes public filing of unredacted personal identifying information.

6. For any category as to which the Debtors contend no responsive documents exist, the Debtors shall identify the custodians and systems searched and certify that conclusion after reasonable inquiry.

7. The Class Claimants are granted leave to supplement the evidentiary record following the October 15, 2026 hearing, including through the submission of additional documents or testimony as warranted by the Debtors' production.

8. The Class Claimants are awarded their reasonable attorneys' fees and costs incurred in connection with the Motion pursuant to Federal Rule of Civil Procedure 37(a)(5)(A), made applicable by Federal Rule of Bankruptcy Procedure 7037. Within fourteen days after entry of this Order, the Class Claimants shall file a statement itemizing such fees and costs, together with supporting documentation. The Court reserves jurisdiction to determine the reasonableness and amount of the award.

9. The Court retains jurisdiction to enforce this Order and resolve any dispute concerning the production ordered herein.

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