IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

In re: WELLMADE FLOOR COVERINGS INTERNATIONAL, INC., *et al*., Debtors.	Chapter 11 Case No. 25-58764-SMS

CREDITOR ANTHONY DAVIS'S SUPPLEMENTAL MEMORANDUM IN SUPPORT OF MOTION FOR RELIEF FROM AUTOMATIC STAY

COMES NOW, Creditor Anthony Davis ("Davis"), by and through undersigned counsel, and files this Supplemental Memorandum in Support of his Motion for Relief from the Automatic Stay, addressing Debtors' Response to Creditor Anthony Davis's Motion for Relief from Stay [Doc. 455] (the "Response"), and respectfully shows the Court as follows:

INTRODUCTION

Davis moved for relief from the automatic stay so that his retaliation claim under 42 U.S.C. § 1981 — a personal injury tort claim that 28 U.S.C. § 157(b)(5) requires be adjudicated in the district court rather than liquidated here — may proceed there. Debtors' Response does not dispute the relevant procedural history: Davis's proof of claim attaches the Complaint asserting that claim, the underlying Lawsuit was stayed shortly after the Petition Date, and Debtors have since filed a Chapter 11 Plan under which they intend to object to the Claim and resolve it administratively. Response ¶¶3–10. Debtors instead argue that Davis's claim is not a

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"personal injury tort" under § 157(b)(5), and that even if it is, he waived his right to have it tried in the district court — and his right to a jury trial — by filing a proof of claim. Neither ground withstands scrutiny. Because the Motion turns entirely on those two questions, the Court's ruling on it will be immediately appealable. See *Ritzen Group, Inc. v. Jackson Masonry, LLC*, 589 U.S. 35, 41 (2020) (order unreservedly granting or denying relief from the automatic stay is final and appealable under 28 U.S.C. § 158(a)(1)).

ARGUMENT

I. The §1981 Claim Is a "Personal Injury Tort" Under §157(b)(5) and Must Be Liquidated in the District Court.

A. Section 157's Carve-Out for Personal Injury Tort Claims.

Ordinarily, a creditor's claim is filed and liquidated in the same court. A proof of claim is "deemed allowed" once filed unless a party in interest objects, 11 U.S.C. § 502(a), and Congress classified "allowance or disallowance of claims against the estate" as a "core proceeding" — one the bankruptcy judge may "hear and determine," entering "appropriate orders and judgments" subject only to appellate review. 28 U.S.C. §§ 157(b)(1), (b)(2)(B). In the ordinary case, then, the bankruptcy court that administers the estate is also the court that decides whether, and in what amount, a claim against it is valid.

Personal injury tort claims are the exception. Section 157(b)(2)(B) excludes "the liquidation or estimation of ... personal injury tort or wrongful death claims"

from the definition of a core proceeding, and § 157(b)(2)(O)'s residual catch-all repeats the identical carve-out — confirming the exclusion is categorical, not confined to (b)(2)(B) alone. Section 157(b)(5) then supplies the mandatory result: "[t]he district court shall order that personal injury tort and wrongful death claims shall be tried in the district court in which the bankruptcy case is pending…" 28 U.S.C. § 157(b)(5).

B. The Weight of Authority Holds Civil-Rights and Discrimination Claims Are "Personal Injury Tort" Claims

The Supreme Court has already answered, in substance, the question this Court must resolve. In *Goodman v. Lukens Steel Co.*, 482 U.S. 656 (1987), the Court held that a claim under 42 U.S.C. § 1981 must be characterized, for statute-of-limitations purposes, as a personal injury action. Extending the reasoning it had applied to 42 U.S.C. § 1983 claims two years earlier in *Wilson v. Garcia*, 471 U.S. 261 (1985), the Court explained that § 1981 has a "broader focus than contractual rights," and that a claim under the statute is, at its core, "a fundamental injury to the individual rights of a person." *Id.* at 661. *Moore v. Idealease of Wilmington*, 358 B.R. 248, 250–51 (E.D.N.C. 2006) (holding civil rights claims under 42 U.S.C. §§ 1981 & 1982 "constitute 'personal injury tort claims'" under § 157); *Barber v. Arnott (In re Arnott)*, 512 B.R. 744, 749 (Bankr. S.D.N.Y. 2014); *Thomas v. Adams (In re Gary Brew Enterprises, Ltd.)*, 198 B.R. 616, 619 (Bankr. 1996); *Goldschmidt v. Erickson (In re Erickson)*, 330 B.R. 346, 349–50 (Bankr. D. Conn. 2005) ("claims alleging

that a debtor illegally discriminated in employment on the basis of race, creed, disability or sex are personal injury tort claims"); *Sanjari v. Reed (In re Sanjari)*, 2006 Bankr. LEXIS 783 (Bankr. D. Mass. 2006) (holding debtor's civil rights claims were "personal injury torts" under § 157); *Stranz v. Ice Cream Liquidation, Inc.*, 281 B.R. 154, 161 (Bankr. D. Conn. 2002) (holding sexual harassment and race/sex discrimination claims under Title VII are "personal injury tort claims" under § 157).

Bankruptcy courts applying § 157(b)(5) directly have reached the identical conclusion on facts closely resembling Davis's own. In *Thomas v. Adams* (*In re Gary Brew Enterprises, Ltd.*), 198 B.R. 616 (Bankr. S.D. Cal. 1996), a former employee filed a proof of claim against a Chapter 7 debtor asserting racial discrimination in employment under 42 U.S.C. § 1981 — the same statute Davis sues under, asserted the same way, against a debtor in the same procedural posture. The trustee argued that filing the proof of claim waived any right to have the claim tried outside the bankruptcy court. The court rejected that argument and held that § 1981 discrimination claims are personal injury tort claims under § 157(b)(5) explaining that it would be "a strange anomaly" to characterize the same claim as a personal injury tort for statute-of-limitations purposes — as *Goodman* requires — while denying it that same characterization under § 157(b)(5). *Gary Brew Enterprises*, 198 B.R. at 620.

Barber v. Arnott (In re Arnott), confirms the point on facts even closer to Davis's. *Barber,* 512 B.R. 744 (Bankr. S.D.N.Y. 2014). There, a former employee sued her employer and an individual supervisor for hostile work environment and retaliatory termination under § 1981 and New York's Human Rights Law; the employer later filed for Chapter 7, and the employee moved for relief from the automatic stay to prosecute her claims in district court. The court held that the discrimination claims, including the § 1981 claim, were personal injury tort claims within the meaning of § 157(b)(5): "[d]iscrimination claims are included under the scope of 'personal injury' actions." 512 B.R. at 753–54 (citing *Goldschmidt v. Erickson (In re Erickson)*, 330 B.R. 346, 349 (Bankr. D. Conn. 2005)). Because the claim could not be liquidated in the bankruptcy court, the court held that fact alone supplied sufficient "cause" to lift the automatic stay under 11 U.S.C. § 362(d)(1) — precisely the relief Davis seeks here. *Id.*

This conclusion finds further, and independent, support directly from this Court. In *In re Adams*, 478 B.R. 476 (Bankr. N.D. Ga. 2012), the court construed the sibling phrase "personal injury" in 11 U.S.C. § 1328(a)(4) — the Chapter 13 discharge exception for damages caused by "willful or malicious injury... that caused personal injury to an individual" — and looked directly to the case law construing "personal injury tort" under § 157(b)(5) itself, since "'personal injury' appears in the language 'personal injury tort or wrongful death claims' in 28 U.S.C. §§ 157(b)(2)(O)

and 157(b)(5)." *Adams*, 478 B.R. at 486 (citing *Adelson v. Smith (In re Smith)*, 389 B.R. 902, 908 (Bankr. D. Nev. 2008)). Adopting the "best-reasoned" of the three approaches bankruptcy courts use to construe that same phrase, the court held that claims vindicating a plaintiff's personal, dignitary interests are "personal injury" claims, while claims vindicating purely financial or business interests are not, regardless of labeling. *Id.* at 487, 487–91.

Davis's claim fits comfortably within the authority cited above: like *Adams*'s defamation and IIED claims, and like the discrimination claims in *Gary Brew Enterprises* and Arnott, it vindicates a personal right — freedom from discrimination in the exercise of protected civil rights — not a purely contractual, financial or business expectation. Under *Goodman*, the bankruptcy courts that have carried its characterization into § 157(b)(5), and this Court's own application of that same framework in *Adams*, Davis's claim is a "personal injury tort" that must be tried in the district court.

C. Debtors' Cited Authority is Neither Binding Nor On Point.

Debtors' Response marshals a string of narrow-view characterization decisions. None is binding, and none supports the result Debtors ask this Court to reach. Even the "narrow" view generally does not exclude dignitary or emotional harm categorically; it excludes claims resting fundamentally on financial or business injury, with emotional distress alleged only incidentally — while a claim whose

gravamen is the personal, dignitary harm itself remains within § 157(b)(5). *Bertholet v. Harman*, 126 B.R. 413, 416 (Bankr. D.N.H. 1991) (invoking § 157(b)(5) where distress "is the gravamen of a complaint," not merely "incidental to" an economic dispute). *Bertholet* itself is telling: it is not an employment case at all, but a claim against a bankruptcy trustee for negligent liquidation of estate property, where humiliation was incidental to a property dispute — unlike here, where retaliation is the claim itself and the emotional distress Davis seeks is a direct measure of the injury 1981 exists to redress. Am. Compl. ¶¶60, 70–71, 74, *Davis v. Wellmade Indus. MFR. N.A., LLC*, No. 4:25-cv-00030-WMR-WEJ (N.D. Ga. Apr. 28, 2025).

Atron deserves closer attention, since it too arose from a proof of claim alleging wrongful termination "on account of race" under the Elliott-Larsen Civil Rights Act and § 1981. *Atron,* 172 B.R. at 542. But its holding turned entirely on a pleading gap absent here: the court found "[n]either Claimant's pleadings nor counsel's arguments contain any allegation or suggestion that his 'humiliation and emotional distress' are so severe" as to meet the court's borrowed Michigan IIED standard. *Id.* at 544. That state-law severity test is not the one this Court applies — *Adams* asks only whether the interest vindicated is personal/dignitary or purely financial, 478 B.R. at 487–91. By that measure, Davis's claim qualifies regardless of

Atron's pleading gap: his § 1981 retaliation claim vindicates the same personal, dignitary interest as *Adams's* defamation and IIED claims.[1]

Vinci, *Interco*, and *Siewert* fare no better, and for the same reason: none involved emotional or dignitary harm as the gravamen of the claim. *Vinci* was a § 1983 regulatory dispute over removal of tires from the debtor's property, with no emotional-distress component pled at all. *Vinci,* 108 B.R. at 439-40, 442-43. In *Interco*, although Priest's proof of claim sought "damages for alleged emotional distress" as part of his ADEA claim, the ADEA does not authorize that relief in the first place. Whatever emotional-distress language appeared in Priest's proof of claim was thus not relief the statute actually permitted — leaving lost wages and ERISA benefits as the only cognizable component of his claim, and confirming that *Interco* was never a case where dignitary or emotional harm was genuinely at stake. *Interco,* 135 B.R. at 361; *Siewert* is weaker still. The claimant there was not an employee asserting a civil-rights violation but a securities broker/dealer pursuing a legal-malpractice claim against the debtor law firm for its role in preparing private placement memoranda he relied on in selling limited-partnership interests that later failed — a business tort seeking recovery for "business losses and litigation-related

[1] *Atron* also acknowledged its own split, citing *Boyer* and *In re Smith* (Bankr. N.D.N.Y.) for the contrary, broader view, 172 B.R. at 545, and expressly declined to reach the *Granfinanciera*/consent question addressed in Argument 2 below. *Id.* at 545.

expenses," not vindication of any personal or dignitary interest. *Siewert*, 194 B.R. at 730-31.

II. CLAIMANT DID NOT WAIVE HIS RIGHT TO HAVE HIS CLAIM TRIED IN THE DISTRICT COURT, OR HIS RIGHT TO A JURY TRIAL, BY FILING A PROOF OF CLAIM, BECAUSE COURTS DO NOT LIGHTLY INFER WAIVER OF SUCH RIGHTS.

A. The Presumption Against Waiver

Waiver is not casually inferred, and courts presume against it rather than for it — particularly where the right said to have been given up is the right to a jury trial. *Aetna Ins. Co. v. Kennedy*, 301 U.S. 389, 393 (1937). The same is true of any right held under federal law: waiver is "ordinarily an intentional relinquishment or abandonment of a known right or privilege," not something inferred from silence, inadvertence, or the ordinary business of participating in a case. *Johnson v. Zerbst*, 304 U.S. 458, 464 (1938). Debtor, as the party asserting waiver, bears the burden of identifying conduct clear and unmistakable enough to overcome that presumption; Davis does not bear the burden of proving he preserved his rights.

Two distinct rights are at stake, and the presumption applies to each: the statutory right under § 157(b)(5) to have a personal injury tort claim tried in the district court and the Seventh Amendment jury-trial right that follows once such a claim reaches a court empowered to try it. Both belong to Davis, and both are his to relinquish — but only knowingly, and only on a record that shows he did.

Courts applying § 157(b)(5) directly bring that same skepticism to this exact circumstance. In *Thomas v. Adams (In re Gary Brew Enterprises, Ltd.)*, 198 B.R. 616, 619 (Bankr. S.D. Cal. 1996), the court rejected the argument that a § 1981 claimant's proof of claim supplied consent to bankruptcy-court liquidation, relying on the Second Circuit's explanation that a proof of claim is a necessary but not sufficient condition for such consent: "the filing of a proof of claim is a necessary condition ... however, it is not a sufficient condition. For instance, 28 U.S.C. § 157(b)(5) requires bankruptcy litigants to try any personal injury or wrongful death action in the district court." *Germain v. Connecticut National Bank*, 988 F.2d 1323, 1327 (2d Cir. 1993), quoted in *Gary Brew Enterprises*, 198 B.R. at 619. *Granfinanciera, S.A. v. Nordberg*, 492 U.S. 33 (1989), and *Langenkamp v. Culp*, 498 U.S. 42 (1990) — the decisions Debtors invoke only indirectly, *see* Part B below — hold only that a creditor who files a proof of claim waives its jury-trial right as to a trustee's preference or fraudulent-transfer counterclaim, not a creditor's own affirmative claim.

B. A Proof of Claim Does Not Impliedly Consent to This Court's Jurisdiction Over Davis's Claim

Sea Island Cotton Trading appears to support Debtors' position, but only because its language is quoted out of the narrow context that actually produced it. *In re Sea Island Cotton Trading, Inc.*, 2000 Bankr. LEXIS 2207, at *3 (Bankr. S.D. Ga. 2000), supplies the line that "the equitable jurisdiction of the bankruptcy court is

exclusive when its jurisdiction has been invoked by the filing of a claim," citing *Granfinanciera* and *Langenkamp*. But that doctrine, traced to *Katchen v. Landy*, 382 U.S. 323 (1966), and extended by *Granfinanciera* and *Langenkamp*, reaches only a trustee's counterclaim against a filed claim — a preference or fraudulent-transfer recovery that merges with the claims-allowance process because it reduces or defeats the very claim the creditor filed. *Sea Island Cotton Trading* itself applied exactly that mechanism a Chapter 7 trustee's preference action against creditors who had filed proofs of claim — and nothing more. It never mentions § 157(b)(5), and its rule does not reach a creditor's own affirmative claim, which is what Debtors need and what Davis has. *Gary Brew Enterprises* confirms the point: confronted with the identical argument, the court agreed *Langenkamp's* general consent rule would "ordinarily resolve the matter" against the creditor but held it does not control because § 157(b)(5) is a later, more specific command Congress adopted for personal injury tort claims specifically. *Gary Brew Enterprises*, 198 B.R. at 616–17.

In re Queyrouze, 2015 U.S. Dist. LEXIS 122802, at *14 (E.D. La. 2015), is not even a personal injury tort case. It addressed a legal-malpractice fee application, never evaluated under § 157(b)(5).

Debtors' citation to *In re Promise Healthcare Group, LLC*, 2023 Bankr. LEXIS 1085 (Bankr. D. Del. 2023), fares no better. Its "fully waivable" line is a single sentence citing only *Stern*, with no finding of waiver on any claimant's

conduct — the governing standard remains the one Davis's own authority already supplies: personal injury tort claims **must** be tried in the district court. See *Gary Brew Enterprises*, 198 B.R. at 616–17; *Arnott*, 512 B.R. at 754; *Erickson*, 330 B.R. at 349–50. The case is also readily distinguishable: the claimant there had no district court action at all — his only attempt to sue outside bankruptcy, filed after the petition without stay relief, was void ab initio, *id.* at *5–6 — and the dispute turned entirely on a limitations defense, which the liquidating trustee unsuccessfully argued required the creditor to also obtain stay relief and sue outside bankruptcy, *id.* at *17–18 (an argument the court rejected, not adopted). Davis has no limitations problem, and already had a district court action in which a scheduling order had set discovery to close by September 8, 2025 before the action was stayed — discovery Debtors themselves concede was underway, having admitted the Lawsuit "was in the early stages of discovery when the Debtors initiated these Cases." Motion for Stay of Relief [Doc. 383] at 4; Debtors' Resp. [Doc. 455] at 3 ¶ 7. Nor did the court address relief from the automatic stay at all; it was resolving a summary judgment motion on the claim's timeliness. If anything the case favors Davis: it holds the resulting dispute "may be heard in either the bankruptcy court or district court, as provided in [§] 157," *id.* at *36–37 — confirming, not foreclosing, that the district court remains available.

That leaves *Byrnes v. Byrnes (In re Byrnes)*, 639 B.R. 239 (Bankr. D.N.M. 2022) — the one citation with facts resembling this case, *Byrnes* does hold, at the page Debtors cite, that "§ 157(b)(5) is not jurisdictional; parties can consent to the bankruptcy court, rather than the district court, hearing personal injury torts." *Id.* at 247. But what *Byrnes* shows is what it takes to *find* that consent: the claimant there litigated on the merits for four months, under a local rule making silence itself count as consent, without ever objecting to the court's jurisdiction before belatedly raising it, *id.* at 248–49, the same after-the-fact pattern the Supreme Court condemned as "sandbagging" in *Stern v. Marshall*, 564 U.S. 462, 481 (2011). Neither is present here.

C. Nothing in This Record Comes Close to the Waiver the Supreme Court Has Required.

The Supreme Court has twice addressed what it actually takes for a bankruptcy litigant to give up the protections that would otherwise keep a matter out of the ordinary Article III process, and both times it set a demanding, fact-specific bar — not a rule that mere participation, or the filing of a proof of claim, is enough.

The first occasion was *Stern v. Marshall*, 564 U.S. 462 (2011). There, Marshall argued that his defamation claim was a "personal injury tort" § 157(b)(5) placed beyond the Bankruptcy Court's power to resolve. The Court did not decide that characterization question — it expressly declined to determine "what constitutes a 'personal injury tort,'" noting "there is at least a three-way divide." *Id.* at 479 n.4.

It resolved the case on a narrower ground instead: § 157(b)(5) "does not have the hallmarks of a jurisdictional decree," is not jurisdictional, and can be waived. *Id.* at 479–480. Applying that rule, the Court found Pierce had waived it — but only on conduct that went far beyond filing a proof of claim. Pierce told the Bankruptcy Court he "would be more than pleased to [litigate] [his] claim there," and said nothing about § 157(b)(5) for over two years — through several adverse discovery rulings — before first raising it. *Id.* at 480–481. Only on that record did the Court find Pierce had "consented to [the Bankruptcy] court's resolution of his defamation claim", having "'sandbagging' the court — remaining silent about his objection and belatedly raising the error only if the case does not conclude in his favor." *Id.* at 480-82 (quoting *Puckett v. United States*, 556 U.S. 129, 134 (2009)).

Wellness International Network, Ltd. v. Sharif, 575 U.S. 665 (2015), confirmed the same high bar from the opposite direction four years later. Addressing whether Article III permits a bankruptcy judge to enter final judgment on a "*Stern* claim" without the parties' consent, the Court held such consent may be implied from conduct only where "the litigant or counsel was made aware of the need for consent and the right to refuse it, and still voluntarily appeared to try the case" — "notification of the right to refuse... is a prerequisite to any inference of consent." *Id.* at 685 (quoting *Roell v. Withrow*, 538 U.S. 588 n.5 (2003)). The Court did not hold that the debtor there had in fact consented; it reversed a categorical bar on consent

and remanded for that fact-specific determination. When Davis's counsel entered an appearance in this case, they expressly reserved "trial by jury in any proceeding so triable," the right to seek withdrawal of the reference, and the right to "seek relief from the stay of proceedings and continue to pursue litigation" in the District Court Action. [Doc. 314.]

D. Even If The Court Were To Retain Davis's Claim, It Could Not Try It To A Jury Without The Express Consent Of All Parties – A Threshold Not Met Here.

Davis's claim is a personal injury tort claim that must be tried in the district court under § 157(b)(5), and Davis has not waived that right by filing a proof of claim. Should the Court nonetheless conclude otherwise as to either point, one further, independent barrier remains: this Court could not itself conduct a jury trial on Davis's claim absent the express consent of all parties — a threshold this record does not meet.

Section 157 draws a sharp line between the consent that might permit a bankruptcy judge to enter final judgment generally and the consent required specifically for a jury trial. *Wellness* held that consent to a bankruptcy judge's entry of final judgment on a *Stern* claim may be implied from conduct, so long as the litigant was first notified of the right to refuse. 575 U.S. at 685. But Congress did not leave the jury-trial question to that same implied-consent framework: a bankruptcy judge may conduct a jury trial only "if specially designated … and with

the express consent of all the parties." 28 U.S.C. § 157(e). "Express consent" is not satisfied by silence, participation in the claims-allowance process, or implied consent of the kind *Wellness* permits for other purposes. See *In re Avila*, 621 B.R. 53, 57 n.5 (Bankr. N.D. Ga. 2020).

Nothing in this record supplies that express consent. Neither party has stipulated, on the record or otherwise, that this Court may conduct a jury trial on Davis's claim, and the district court has not specially designated this Court to do so. Absent that stipulation, the mechanism § 157(e) supplies for a bankruptcy-court jury trial is unavailable here — whether or not the claim is a personal injury tort, and even if the Court found Davis waived his right to have it tried in the district court, this Court would have no lawful way to give him the jury trial the Seventh Amendment guarantees. *Granfinanciera*, 492 U.S. at 64. The claim would then have to proceed, if at all, in the one forum that can try it to a jury without that consent: the district court.

III. ZHU CHEN'S STATUS AS A NON-DEBTOR CO-DEFENDANT CONFIRMS THIS DISPUTE BELONGS IN THE DISTRICT COURT

This court does not have the authority to liquidate Davis's claim against Zhu Chen, a non-debtor co-defendant in the District Court Action. Section 157 extends this Court's jurisdiction to the Debtor's estate, not to an individual who is not himself a debtor here. See *In re Coachworks Holdings, Inc.*, 418 B.R. 490, 494 (Bankr. M.D. Ga. 2009) (bankruptcy court lacks jurisdiction over non-debtor defendants; district

court is the proper forum for all parties). *Coachworks* presents nearly identical facts: a former employee's employment-law claims against a debtor and several individually named non-debtor co-defendants who were the debtor's own owners and officers. *Id.* at 491. Zhu Chen is likewise one of Wellmade's owners, named as an individual defendant in the District Court Action. See Motion [Doc. 383] at 1. The court granted stay relief because the claims against the debtor and its non-debtor owners were "likely to revolve around similar — if not identical — issues and evidence," such that denying relief would force the movant "to prosecute what amounts to the same case in two different forums, with the possibility of inconsistent results." *Id.* at 493. That risk is squarely presented here: Davis's claims against Wellmade and Zhu Chen arise from the same retaliatory conduct and the same evidence, including the same recorded conversations. Splitting them between two forums risks the same duplicative litigation and inconsistent results *Coachworks* warns against. *Id.* The court further held that non-debtor co-defendants retain their own jury-trial rights regardless of any waiver by the debtor, and that only the district court — which has jurisdiction over every party — can vindicate all of those rights, including the right to a jury trial, in a single proceeding. *Id.* Davis's claim against Zhu Chen must proceed in the district court regardless of the outcome as to Wellmade.

CONCLUSION

For the foregoing reasons, Debtors' objections fail on both fronts: Davis's claim is a personal injury tort claim that this Court cannot liquidate, and nothing in the record comes close to the waiver Debtors would need to show to keep it here. Creditor Davis respectfully requests that this Court overrule Debtors' objection, lift the automatic stay, and allow the District Court Action to proceed.

Respectfully submitted this the 3rd of September, 2026.

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CERTIFICATE OF SERVICE

I hereby certify that on this day, I electronically filed the foregoing Supplemental Memorandum in Support of Motion for Relief from the Automatic Stay using the CM/ECF system, which will automatically send email notification of such filing to all attorneys of record.

Respectfully submitted, this 3rd day of September, 2026.

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