



Honorable Mike K. Nakagawa
United States Bankruptcy Judge



Entered on Docket
September 10, 2024

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

* * * * *

In re:)	Case No. 23-10423-mkn
)	
CASH CLOUD, INC.,)	Chapter 11
dba COIN CLOUD,)	
)	
Debtor.)	
)	
CASH CLOUD, INC., dba COIN CLOUD,)	Adv. Proc. No. 23-01015-mkn
)	
Plaintiff,)	
)	Date: May 22, 2024
vs.)	Time: 9:30 a.m.
)	
LUX VENDING, LLC, d/b/a/ BITCOIN)	
DEPOT,)	
)	
Defendant.)	
)	

**ORDER ON DEFENDANT LUX VENDING, LLC D/B/A BITCOIN DEPOT'S MOTION
TO COMPEL COMPLETE AND NON-EVASIVE ANSWERS TO FIRST SET OF
INTERROGATORIES¹**

¹ In this Order, all references to "ECF No." are to the numbers assigned to the documents filed in the above-captioned bankruptcy case as they appear on the docket maintained by the Clerk of the Court. All references to "AECF No." are to the documents filed in the above-captioned adversary proceeding. All references to "Section" are to provisions of the Bankruptcy Code, 11 U.S.C. § 101, et seq. All references to "Bankruptcy Rule" are to the Federal Rules of Bankruptcy Procedure. All references to "Civil Rule" are to the Federal Rules of Civil

On May 22, 2024, the court heard Defendant Lux Vending, LLC d/b/a Bitcoin Depot's Motion to Compel Complete and Non-Evasive Answers to First Set of Interrogatories ("Motion to Compel") brought in the above-captioned adversary proceeding. The appearances of counsel were noted on the record. After the hearing, the matter was taken under submission.

BACKGROUND²

On February 7, 2023, Cash Cloud, Inc. dba Coin Cloud ("Debtor") filed a voluntary "skeleton" Chapter 11 petition ("Petition"). (ECF No. 1). The Petition is signed by Chris McAlary ("McAlary") as the Debtor's President. An "ACTION BY WRITTEN CONSENT OF THE DIRECTORS" also is attached to the Petition and signed by McAlary as Director. The document also includes a provision retaining Daniel Ayala ("Ayala") as an "independent director" of the Debtor. No schedules of assets and liabilities ("Schedules") or statement of financial affairs ("SOFA") is attached to the Petition. Notice of the Chapter 11 bankruptcy was filed and served, setting a meeting of creditors under Section 341(a) for March 16, 2023 ("341 Meeting"). (ECF No. 2).

On March 9, 2023, Debtor filed its Schedules and SOFA signed by McAlary. (ECF No. 239).

On March 10, 2023, Cash Cloud, Inc., dba Coin Cloud ("Cash Cloud") commenced the above-captioned adversary proceeding ("Adversary Proceeding") against defendant Lux Vending, LLC dba Bitcoin Depot ("Lux"). (ECF No. 257). Cash Cloud's complaint ("Adversary Complaint") is styled as nine separate claims: (1) temporary restraining order and preliminary injunctive relief; (2) violation of automatic stay under Section 362(a)(3); (3) violation of Lanham Act under Section 1125; (4) consumer fraud/deceptive trade practices; (5)

Procedure. All references to "FRE" are to the Federal Rules of Evidence. All references to "Local Rule" are to the Local Rules of Bankruptcy Practice for the District of Nevada.

² Pursuant to FRE 201(b), the court takes judicial notice of all materials appearing on the docket in the above-captioned adversary proceeding and the above-captioned Bankruptcy Case See Bank of Am., N.A. v. CD-04, Inc. (In re Owner Mgmt. Serv., LLC Trustee Corps.), 530 B.R. 711, 717 (Bankr.C.D.Cal. 2015) ("The Court may consider the records in this case, the underlying bankruptcy case and public records.").

1 tortious interference with Contract – Host Agreements; (6) tortious interference with Contract –
 2 2020 Purchase Agreement; (7) intentional tortious interference with prospective business
 3 relations; (8) injurious falsehoods; and (9) defamation. (AECF No. 1). Attached to the
 4 Adversary Complaint are copies of four exhibits consisting of (1) a Master Purchase Agreement
 5 dated September 4, 2015, (2) another Master Purchase Agreement dated January 23, 2020, (3) a
 6 Form 8-K dated August 24, 2022, filed with the U.S. Securities and Exchange Commission, and
 7 (4) a letter dated August 31, 2022, addressed to the Honourable Jaye Hooper regarding Cash
 8 Cloud Inv. v. BitAccess Inc., Court File No. CV-22-89877.

9 On March 16, 2023, the 341 Meeting was concluded.

10 On March 21, 2023, Cash Cloud filed a Motion for Temporary Restraining Order (“TRO
 11 Motion”) as well as a Motion for Preliminary Injunction (“Injunction Motion”), along with a
 12 request to have both motions heard on shortened time, to which are attached separate documents
 13 marked as exhibits 1 through 7.³ (AECF Nos. 5 and 6).

14 On March 31, 2023, an order was entered allowing the TRO Motion and Injunction
 15 Motion to be heard on April 20, 2023. (AECF No. 13).

16 On April 12, 2023, Lux filed opposition to both the TRO Motion and the Injunction
 17 Motion (“TRO Opposition” and “Injunction Opposition”), along with the Omnibus Declaration
 18 of Scott Buchanan as well as a Request for Judicial Notice (“RJN”). (AECF Nos. 27-30).
 19 Attached to the RJN as Exhibit A is a copy of a decision entered on October 4, 2022, by the
 20 Superior Court of Justice, Ontario Province, Canada, in Cash Cloud Inc. v. BitAccess Inc.,

21 ³ Copies of the same seven exhibits are attached to the TRO Motion and the Injunction
 22 Motion. They consist of: (1) a Kiosk Site Location Agreement with Lux dated 3-9-21; (2) a
 23 letter from Fasken to the Honorable Jaye Hooper dated August 31, 2022; (3) an email exchange
 24 between Frank Schilling and Landon Thomas dated February 8, 2023; (4) a forwarded email
 25 from MT to Chris McAlary regarding an email sent from Todd Umstott to MT dated February
 26 22, 2023; (5) a forwarded email from Raymond Taddeo to Michael Tomlinson dated March 10,
 27 2023, involving an email exchange between Frank Schilling and Landon Thomas, regarding
 28 “Bitcoin ATM Industry Shake-up - CoinCloud Bankruptcy”; (6) a forwarded email from MT to
 Chris McAlary dated March 10, 2023, involving an email exchange between Norm Neike and
 MT, regarding an email exchange between Mark Smith and Sarah Wessel, regarding “Bit Coin
 Depot at Cub”; and (7) a Declaration of Christopher McAlary in Support of Plaintiff’s Motion
 for Temporary Restraining Order (“McAlary TRO Declaration”).

1 assigned Case File No. CV-22-89887.

2 On April 13, 2023, Lux filed a motion to dismiss the Adversary Complaint (“Lux Motion
3 to Dismiss”), which was noticed to be heard on May 17, 2023. (AECF Nos. 31 and 32).

4 On April 17, 2023, Cash Cloud filed a reply in support of its TRO Motion (“TRO
5 Reply”) and Injunction Motion (“Injunction Reply”). (AECF Nos. 38 and 39).

6 On April 20, 2023, both the TRO Motion and the Injunction Motion were heard and
7 taken under submission.

8 On June 8, 2023, McAlary resigned as president and chief executive officer.⁴

9 On June 16, 2023, Ayala, as the Debtor’s remaining independent director, filed a
10 declaration in support of the Debtor’s motion confirming an auction sale of substantially all of
11 the Debtor’s assets. (ECF No. 715).⁵

12 On September 1, 2023, the UCC commenced Adversary Proceeding No. 23-01125
13 against McAlary. The complaint filed in that proceeding seeks the avoidance and recovery from
14 McAlary of various prebankruptcy transfers. It also seeks damages and equitable relief under
15 various claims brought under Nevada law as well various forms of legal and equitable relief
16 under various provisions of the Bankruptcy Code.

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18 ⁴ On June 23, 2023, the Official Committee of Unsecured Creditors (“UCC”) formed in
19 the Debtor’s reorganization proceeding filed a “Statement and Reservation of Rights” concerning
20 the Debtor’s proposed sale of substantially all of its operating assets. (ECF No. 758). Among
21 other things, the UCC reported as follows: “The Debtor informed the Committee that Chris
22 McAlary, the Debtor’s CEO and director, resigned from the company on or about June 9, 2023.
23 Mr. McAlary’s resignation and his postpetition conduct, which the Committee intends to
24 investigate, raise questions about his intent to acquit his fiduciary duties to all of the Debtor’s
25 creditors during the course of this case....Moreover, since Mr. McAlary’s resignation, a host of
26 other company issues are coming to light that shed serious doubt on the propriety of Mr.
27 McAlary’s postpetition conduct. The Committee has requested a litigation hold with respect to
28 all business and personal documents and communications within Mr. McAlary’s possession,
custody, or control, which is pertinent to the Committee’s ongoing investigation into the
Debtor’s financial position and pre- and postpetition conduct, but has not received any response
from Mr. McAlary.” Statement and Reservation of Rights at 3:10-28.

⁵ At that time, McAlary already had resigned and Ayala apparently was the Debtor’s only
remaining director. In addition to Ayala’s declaration, additional declarations were filed by
individuals representing the Debtor’s financial adviser, and the purchasers of the assets. (ECF
Nos. 716, 717, and 718).

1 On November 17, 2023, an order was entered denying both the TRO Motion and the
2 Injunction Motion (“Order on TRO Motion”).⁶ (AECF No. 53).

3 On November 17, 2023, an order was entered granting in part and denying in part the Lux
4 Motion to Dismiss. (AECF No. 54).

5 On December 1, 2023, an answer to the Adversary Complaint was filed by Lux. (AECF
6 No. 59).

7 On December 12, 2023, the parties filed a stipulated amended discovery plan under
8 which all fact discovery would close by January 31, 2025. (AECF No. 62).

9 On February 9, 2024, an order was entered scheduling a settlement conference to be held
10 on April 12, 2024. (AECF No. 64).

11 On April 12, 2024, an order was entered continuing the settlement conference to April
12 25, 2024. (AECF No. 72).

13 On April 19, 2024, Lux filed the instant Motion to Compel, accompanied by the
14 declaration of Adam Schwartz, Esq. (“Schwartz Declaration”), and noticed it to be heard on May
15 22, 2024.⁷ (AECF Nos. 75, 76, and 77).

16 On May 8, 2024, Debtor filed its opposition (“Compel Opposition”) to the Motion to
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20 ⁶ In denying the TRO Motion, the court concluded that “[T]he McAlary Declaration is
21 substantially, if not fatally, flawed.” Order on TRO Motion at 6:28. The multiple evidentiary
22 deficiencies in the McAlary Declaration were discussed, including his lack of personal
23 knowledge of many assertions of both fact and law. *Id.* at 7:1-15 & n.7. In seeking interim
24 injunctive relief, it was the Debtor’s burden of demonstrating a probability of success on the
25 merits in this Adversary Proceeding. Debtor’s apparent reliance on McAlary as its only
percipient witness, however, was fraught at best. After McAlary’s resignation and subsequent
pursuit by the UCC, it is unclear whether further reliance on testimony from the same witness
can be expected.

26 ⁷ A copy of the first set of interrogatories (“Interrogatories”) encompassed by the instant
27 Motion to Compel is attached as Exhibit “A” to the Schwartz Declaration. The Interrogatories
were propounded on January 26, 2024. A copy of the Debtor’s response to the Interrogatories is
28 attached to Exhibit “C” to the Schwartz Declaration. Attached to the responses is a verification
signed by Ayala.

1 Compel.⁸ (AECF No. 80).⁹

2 On May 15, 2024, Lux filed its reply in support of the Motion to Compel (“Reply”).
3 (AECF No. 82).

4 APPLICABLE LEGAL STANDARDS

5 Pursuant to Civil Rule 37 and in relation to Civil Rule 33, Lux filed the instant motion
6 compelling answers to the requested interrogatories made on Debtor. This motion and its related
7 discovery requests are made applicable through this proceeding by Bankruptcy Rules 7037 and
8 7033, and Local Rule 7037. Under Civil Rule 37(a)(3)(B)(iii) and (iv), a party who has served
9 interrogatories or a document request may move to compel answers and production. A
10 prevailing party can recover costs, including attorney fees, unless the motion or opposition was
11 substantially justified or other circumstances make an expense award unjust. If the court grants
12 the motion but the responding party does not comply with the order, Civil Rule 37(b) permits
13 sanctions for failure to comply with the order. See In re 2377 NW Kearney LLC, 2023 WL
14 4571947, at *1 (Bankr. D. Ore. July 17, 2023).

15 A motion to compel must include a threshold showing that the requested information falls
16 within the scope of discovery under Civil Rule 26. “The party opposing discovery has the
17 burden of showing that the discovery is, among other things, irrelevant, overly broad, or unduly
18 burdensome.” See Caballero v. Bodega Latina Corp., 2017 WL 3174931, at *3 (D. Nev. July 25,
19 2017); see also Culkin v. Pitney Bowes, Inc., 225 F.R.D. 69, 71 (D. Conn. 2004) (“The
20 defendant, as the objecting party, bears the burden of showing why discovery should be
21 denied.”). To meet this burden, the objecting party must detail the reasons why each request is
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23 ⁸ Four exhibits are attached to the Compel Opposition. Exhibit “3” is a copy of the
24 Debtor’s First Supplemental Disclosures under Fed.R.Civ.P. 26, dated April 2, 2024 (“Supp.
25 Disclosures”). Exhibit “4” is a copy of the Debtor’s Supplemental Answers and Objections to
26 Defendant Lux Vending, LLC’s First Set of Interrogatories to Plaintiff and Debtor Cash Cloud,
dated April 1, 2024 (“Supp. Responses”).

27 ⁹ Debtor represents that its opposition is based, *inter alia*, on the attached exhibits as well
28 as the “Declaration of James M. Jimmerson, Esq.” See Compel Opposition at 2:2-4. No such
declaration was attached to the Debtor’s opposition nor filed separately in support of the Compel
Opposition.

1 objectionable. See Caballero, 2017 WL 3174931, at *3. Civil Rule 26(b)(1) states the
2 following:

3 Parties may obtain discovery regarding any nonprivileged matter that is
4 relevant to any party's claim or defense and proportional to the needs of the
5 case, considering the importance of the issues at stake in the action, the
6 amount in controversy, the parties' relative access to relevant information, the
7 parties' resources, the importance of the discovery in resolving the issues, and
whether the burden or expense of the proposed discovery outweighs its likely
benefit.

8 See FED. R. CIV. P. 26(b)(1). To be discoverable under Civil Rule 26(b)(1), information must be
9 (1) relevant to any party's claim or defense and (2) proportional to the needs of the case. See
10 Caballero, 2017 WL 3174931, at *1.¹⁰

11 “In deciding whether to restrict discovery under Fed. R. Civ. P. 26(b)(2)(C), the Court
12 should consider the totality of the circumstances, weighing the value of the material sought
13 against the burden of providing it, and taking into account society's interest in furthering the
14 truth-seeking function in the particular case before the court.” See Caballero, 2017 WL
15 3174931, at *3. Active involvement by courts is encouraged and necessary in discovery matters.
16 Id. Furthermore, Civil Rule 26 gives courts “broad discretion to tailor discovery narrowly and to
17 dictate the sequence of discovery.” See Caballero, 2017 WL 3174931, at *3; see also Culkin,
18 225 F.R.D. at 71 (“Moreover, the court is afforded broad discretion in deciding discovery
19 issues.”).

20 DISCUSSION

21 In its motion, Lux lists several interrogatories along with the Debtor’s responses and
22 argues that the responses are inadequate. More specifically, Lux requests that the Debtor
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27 ¹⁰ Discovery generally is relevant and permissible if the discovery might lead to
28 admissible evidence. See FED.R.CIV.P. 26(b)(1). In other words, the requesting party need not
establish that the requested information would be admissible at trial.

1 withdraw its objections to Interrogatories 6 through 11¹¹ and Interrogatory 13,¹² and be required
2 to provide complete and non-evasive answers.¹³ See Motion to Compel at 5:9 to 15:17.

3 Debtor's responses were due on February 26, 2024. See Schwartz Declaration at ¶ 3. On
4 February 23, 2024, Debtor requested a 10-day extension, to which Lux consented. Id. On March
5 8, 2024, Debtor served its responses. Id. at ¶ 4. Lux alleges that many of Debtor's initial
6 "answers" provide no substantive information, and instead, Debtor asserts blanket objections.
7 See Motion to Compel at 2:21-26. For example, on many occasions, Debtor asserts that it "has
8 no one currently under its control with personal knowledge of the requested information." See
9 Schwartz Declaration at ¶ 5.

10 Debtor maintains that it provided a detailed explanation for its answers to each
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12 ¹¹ Interrogatory 6 asks the Debtor to "Identify the number of times and the corresponding
13 dates that the screenshot of the Google Ad appeared as a result of the search terms used by
14 Plaintiff to generate the screenshot of the Google advertisement on page 16 of the Complaint."
15 Interrogatory 7 asks the Debtor to "Identify the specific provisions, paragraphs, or terms of the
16 2020 Purchase Agreement that BitAccess, Inc., breached, as alleged in paragraph 126 of the
17 Complaint, including the date(s) of the alleged breach and how each provision, paragraph, or
18 term was breached." Interrogatory 8 asks the Debtor to "Identify the kiosk host(s) that breached
19 host contract(s), as alleged in paragraph 126 of the Complaint, and identify Plaintiff's point of
20 contact for each of these kiosk hosts. Interrogatory 9 asks the Debtor to Identify Plaintiff's
21 contracts, and the specific provisions, paragraphs, or terms of the contract(s), with kiosk host(s)
22 that the kiosk host(s) breached, as alleged in paragraph 126 of the Complaint, including the
23 date(s) of the alleged breach and how each provision, paragraph, or term was breached."
24 Interrogatory 10 asks the Debtor to "Describe Plaintiff's alleged relationship with the kiosk
25 host(s) that breached host contract(s), as alleged in paragraph 126 of the Complaint, including
26 but not limited to: (a) When Plaintiff first met or communicated with each kiosk host; (b) When
27 Plaintiff and each kiosk host established their contractual relationship; (c) How Plaintiff and each
28 kiosk host established the alleged relationship; [and] (d) The terms and conditions of the alleged
relationship between Plaintiff and each kiosk host." Interrogatory 11 asks the Debtor to
"Identify the new customer agreements, and the specific provisions, paragraphs, or terms of the
agreements, that Defendant purportedly disrupted, as alleged in paragraphs 138-142 of the
Complaint, including but not limited to: (a) How Plaintiff and prospective customers execute the
new customer agreements; [and] (b) The terms and conditions of the new customer agreements."

12 ¹² Interrogatory 13 asks the Debtor to "Identify all keywords used by Plaintiff as part of
13 any marketing efforts, including sponsored advertising, search engine optimization, Google Ads,
14 social media, print advertisements, or any other marketing materials."

15 ¹³ Lux does not seek any specific additional relief under Civil Rule 37(a). See Motion to
16 Compel at 16:2-5.

interrogatory in question, that its answers are neither incomplete nor deficient, and that it has answered the interrogatories to the best of its current ability. See generally Compel Opposition at 1:3-25. Debtor explains that it has only had two employees since at least January 1, 2024, and neither of those employees possesses the knowledge needed to answer questions regarding facts alleged in the Adversary Complaint. Id. at 1:26 to 2:6. Debtor also maintains that it did provide Lux with the names of multiple persons that the Debtor believes may testify in the litigation. Id. at 2:7-24; 3:14-27.¹⁴

Both sides to this dispute are well aware of their duty to timely supplement prior responses to discovery, see note 8, supra, as well as the consequences of a failure to do so. See FED.R.CIV.P. 26(e) and FED.R.CIV.P. 37(c)(1).¹⁵ At the outset of this action, the Adversary Complaint was not verified, but the TRO Motion was accompanied by the McAlary Declaration. For reasons previously mentioned, the court gave little or no weight to that testimony, primarily because it was not based on personal knowledge. See discussion at note 6, supra. Within three months after this Adversary Proceeding was commenced, McAlary resigned, and Ayala stepped

¹⁴ Debtor's response to Interrogatories 6, 7 and 11, verified by Ayala, includes the following language: "It is Plaintiff's understanding that..." That language attempts to address the substance of the actual Interrogatory but concedes the absence of personal knowledge. Debtor's response to Interrogatories 8, 9, 10, and 13 do not include similar language. Instead those responses, like the others, include common language where the Debtor merely expresses that "Plaintiff has no one currently under its control with personal knowledge of the requested information." In other words, none of the responses to the Interrogatories are based on personal knowledge despite the verification signed by Ayala.

¹⁵ The requirement to supplement discovery responses must be read in conjunction with the certification provisions of Bankruptcy Rule 9011(b). Under that provision, "signing, filing, submitting, **or later advocating**" matters presented to the court constitutes a certification "that to the best of a person's knowledge, information, and belief, formed after an inquiry reasonable under the circumstances...the allegations and other factual contentions have evidentiary support or, if specifically so identified, are likely to have evidentiary support after a reasonable opportunity for further investigation or discovery..." FED.R.BANKR.P. 9011(b)(3). (Emphasis added.). See, e.g., In re Estate of Taplin, Ernest Von, 641 B.R. 236, 248 (Bankr. E.D. Cal. 2022) (Bankruptcy Rule 9011 bar to later advocating untenable position applies to both written and oral advocacy unless the position is promptly corrected or abandoned); In re Schivo, 462 B.R. 765, 777 (Bankr. D. Nev. 2011) (Bankruptcy Rule 9011 applies to later advocacy of an earlier position that was taken without reasonable factual investigation).

in as the Debtor's primary officer. Now McAlary is being sued on behalf of the estate by the UCC in a separate action. Irrespective of who was or currently is the Debtor's primary officer, however, the burden of proof in the current Adversary Proceeding has never changed: it always rests with the Debtor. Therefore, it is not enough for the Debtor to simply list individuals who might have information that would support the factual allegations of its Adversary Complaint;¹⁶ instead, the Debtor is obligated to specify what that information might entail.

Beyond the appearance of attempting to reverse the burden of proof in this Adversary Proceeding, there is no evidence in the record demonstrating what effort, if any, the Debtor has undertaken to obtain testimony or information from the witnesses it has identified.¹⁷ There also is no evidence in the record demonstrating what effort, if any, the Debtor took to obtain and preserve any testimony of employees whose days became numbered once the Debtor initiated steps to minimize operations by selling substantially all of its assets.

Under these circumstances, the court concludes that the Debtor's responses to Interrogatories 6 through 11 and Interrogatory 13 are incomplete but not evasive. Further responses will be required as set forth below.

IT IS THEREFORE ORDERED that Defendant Lux Vending, LLC d/b/a Bitcoin Depot's Motion to Compel Complete and Non-Evasive Answers to First Set of Interrogatories, Docket No. 75, be, and the same hereby is, **GRANTED AS PROVIDED HEREIN**.

IT IS FURTHER ORDERED that Plaintiff Cash Cloud, Inc., dba Coin Cloud, shall supplement its responses to Interrogatories 6 through 11 and Interrogatory 13. **No later than September 30, 2024**, Plaintiff shall provide a timeline and a detailed description of the steps being undertaken to obtain from percipient witnesses or other sources the information requested

¹⁶ See Supp. Disclosure at 3:2 to 5:25; Supp. Responses at 4:18 to 5:6.

¹⁷ Outside the usual discovery tools available in federal civil practice, Bankruptcy Rule 2004 also allows any party in interest to seek a court order permitting the examination of any entity. To assist in such examinations or production of records, Bankruptcy Rule 9016 provides for the issuance of subpoenas under Civil Rule 45. Like compelled discovery and testimony of third parties in federal civil practice, the usual protections and limitations may be sought.

1 in the subject Interrogatories. The timeline and detailed descriptions must be set forth in a status
2 report served and filed no later October 3, 2024.

3 **IT IS FURTHER ORDERED** that the requirement to timely supplement discovery
4 responses under Federal Rule of Civil Procedure 26(e) is not altered or modified by this Order
5 and remains applicable to all parties in this Adversary Proceeding.

6 **IT FURTHER ORDERED** that a hearing will be conducted telephonically on Thursday
7 October 10, 2024, at 10:00 a.m. to discuss the status of this Adversary Proceeding as well as
8 completion of discovery.

9
10 Copies sent via CM/ECF ELECTRONIC FILING

11 Copies sent via BNC to:
12 JAMES M. JIMMERSON
13 THE JIMMERSON LAW FIRM, P.C.
14 415 SOUTH 6TH STREET, SUITE 100
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