

Fill in this information to identify your case:

United States Bankruptcy Court for the:

Southern District of New York

Case number (if known): _____

Chapter you are filing under:

- ☐ Chapter 7
☒ Chapter 11
☐ Chapter 12
☐ Chapter 13

FILED
U.S. BANKRUPTCY COURT

2019 MAR 11 P 12:04

S.D. OF N.Y.

☐ Check if this is an amended filing

Official Form 101

Voluntary Petition for Individuals Filing for Bankruptcy

12/17

The bankruptcy forms use *you* and *Debtor 1* to refer to a debtor filing alone. A married couple may file a bankruptcy case together—called a *joint case*—and in joint cases, these forms use *you* to ask for information from both debtors. For example, if a form asks, “Do you own a car,” the answer would be yes if either debtor owns a car. When information is needed about the spouses separately, the form uses *Debtor 1* and *Debtor 2* to distinguish between them. In joint cases, one of the spouses must report information as *Debtor 1* and the other as *Debtor 2*. The same person must be *Debtor 1* in all of the forms.

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

Part 1: Identify Yourself

About Debtor 1:

About Debtor 2 (Spouse Only in a Joint Case):

1. Your full name

Write the name that is on your government-issued picture identification (for example, your driver's license or passport).

Bring your picture identification to your meeting with the trustee.

Jeffrey

First name

Lew

Middle name

Liddle

Last name

Suffix (Sr., Jr., II, III)

First name

Middle name

Last name

Suffix (Sr., Jr., II, III)

2. All other names you have used in the last 8 years

Include your married or maiden names.

First name

Middle name

Last name

First name

Middle name

Last name

First name

Middle name

Last name

First name

Middle name

Last name

3. Only the last 4 digits of your Social Security number or federal Individual Taxpayer Identification number (ITIN)

XXX - XX - 8 2 5 6

OR

9 XX - XX -

XXX - XX -

OR

9 XX - XX -

Debtor 1 **Jeffrey Lew Liddle**
First Name Middle Name Last Name

Case number (if known) _____

About Debtor 1:

4. Any business names and Employer Identification Numbers (EIN) you have used in the last 8 years

Include trade names and doing business as names

☐ I have not used any business names or EINs.

Liddle & Robinson, L.L.P.

Business name

Business name

1 3 3 2 2 6 4 4 0
EIN

EIN

About Debtor 2 (Spouse Only in a Joint Case):

☐ I have not used any business names or EINs.

Business name

Business name

EIN

EIN

5. Where you live

420 East 54th Street

Number Street

Apt. 713

New York

City

NY

State

10022

ZIP Code

New York

County

If your mailing address is different from the one above, fill it in here. Note that the court will send any notices to you at this mailing address.

11 5th Avenue

Number Street

c/o Third Brevoort

P.O. Box

New York

City

NY

State

10003

ZIP Code

If Debtor 2 lives at a different address:

Number Street

City

State

ZIP Code

County

If Debtor 2's mailing address is different from yours, fill it in here. Note that the court will send any notices to this mailing address.

Number Street

P.O. Box

City

State

ZIP Code

6. Why you are choosing this district to file for bankruptcy

Check one:

☒ Over the last 180 days before filing this petition, I have lived in this district longer than in any other district.

☐ I have another reason. Explain.
(See 28 U.S.C. § 1408.)

Check one:

☐ Over the last 180 days before filing this petition, I have lived in this district longer than in any other district.

☐ I have another reason. Explain.
(See 28 U.S.C. § 1408.)

Debtor 1

Jeffrey Lew Liddle

First Name Middle Name Last Name

Case number (if known)

Part 2: Tell the Court About Your Bankruptcy Case

7. The chapter of the Bankruptcy Code you are choosing to file under

Check one. (For a brief description of each, see *Notice Required by 11 U.S.C. § 342(b) for Individuals Filing for Bankruptcy* (Form 2010)). Also, go to the top of page 1 and check the appropriate box.

- ☐ Chapter 7
☒ Chapter 11
☐ Chapter 12
☐ Chapter 13

8. How you will pay the fee

☒ **I will pay the entire fee when I file my petition.** Please check with the clerk's office in your local court for more details about how you may pay. Typically, if you are paying the fee yourself, you may pay with cash, cashier's check, or money order. If your attorney is submitting your payment on your behalf, your attorney may pay with a credit card or check with a pre-printed address.

☐ **I need to pay the fee in installments.** If you choose this option, sign and attach the *Application for Individuals to Pay The Filing Fee in Installments* (Official Form 103A).

☐ **I request that my fee be waived** (You may request this option only if you are filing for Chapter 7. By law, a judge may, but is not required to, waive your fee, and may do so only if your income is less than 150% of the official poverty line that applies to your family size and you are unable to pay the fee in installments). If you choose this option, you must fill out the *Application to Have the Chapter 7 Filing Fee Waived* (Official Form 103B) and file it with your petition.

9. Have you filed for bankruptcy within the last 8 years?

☒ No

☐ Yes. District _____ When _____ Case number _____
MM / DD / YYYY
District _____ When _____ Case number _____
MM / DD / YYYY
District _____ When _____ Case number _____
MM / DD / YYYY

10. Are any bankruptcy cases pending or being filed by a spouse who is not filing this case with you, or by a business partner, or by an affiliate?

☒ No

☐ Yes. Debtor _____ Relationship to you _____
District _____ When _____ Case number, if known _____
MM / DD / YYYY
Debtor _____ Relationship to you _____
District _____ When _____ Case number, if known _____
MM / DD / YYYY

11. Do you rent your residence?

☐ No. Go to line 12.

☒ Yes. Has your landlord obtained an eviction judgment against you?

☒ No. Go to line 12.

☐ Yes. Fill out *Initial Statement About an Eviction Judgment Against You* (Form 101A) and file it as part of this bankruptcy petition.

Debtor 1

Jeffrey Lew Liddle

First Name Middle Name Last Name

Case number (if known)

Part 3: Report About Any Businesses You Own as a Sole Proprietor

12. Are you a sole proprietor of any full- or part-time business?

☐ No. Go to Part 4.

☒ Yes. Name and location of business

A sole proprietorship is a business you operate as an individual, and is not a separate legal entity such as a corporation, partnership, or LLC.

If you have more than one sole proprietorship, use a separate sheet and attach it to this petition.

Liddle & Robinson, L.L.P. (see attached sheet)

Name of business, if any

1177 Avenue of the Americas

Number Street

5th Floor

New York

City

NY

State

10036

ZIP Code

Check the appropriate box to describe your business:

☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))

☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))

☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))

☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))

☒ None of the above

13. Are you filing under Chapter 11 of the Bankruptcy Code and are you a small business debtor?

For a definition of *small business debtor*, see 11 U.S.C. § 101(51D).

If you are filing under Chapter 11, the court must know whether you are a small business debtor so that it can set appropriate deadlines. If you indicate that you are a small business debtor, you must attach your most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).

☐ No. I am not filing under Chapter 11.

☒ No. I am filing under Chapter 11, but I am NOT a small business debtor according to the definition in the Bankruptcy Code.

☐ Yes. I am filing under Chapter 11 and I am a small business debtor according to the definition in the Bankruptcy Code.

Part 4: Report if You Own or Have Any Hazardous Property or Any Property That Needs Immediate Attention

14. Do you own or have any property that poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety? Or do you own any property that needs immediate attention?

For example, do you own perishable goods, or livestock that must be fed, or a building that needs urgent repairs?

☒ No

☐ Yes. What is the hazard?

If immediate attention is needed, why is it needed?

Where is the property?

Number Street

City

State

ZIP Code

Debtor 1

Jeffrey Lew Liddle

First Name

Middle Name

Last Name

Case number (if known)

Part 5: Explain Your Efforts to Receive a Briefing About Credit Counseling

15. Tell the court whether you have received a briefing about credit counseling.

The law requires that you receive a briefing about credit counseling before you file for bankruptcy. You must truthfully check one of the following choices. If you cannot do so, you are not eligible to file.

If you file anyway, the court can dismiss your case, you will lose whatever filing fee you paid, and your creditors can begin collection activities again.

About Debtor 1:

You must check one:

☐ I received a briefing from an approved credit counseling agency within the 180 days before I filed this bankruptcy petition, and I received a certificate of completion.

Attach a copy of the certificate and the payment plan, if any, that you developed with the agency.

☐ I received a briefing from an approved credit counseling agency within the 180 days before I filed this bankruptcy petition, but I do not have a certificate of completion.

Within 14 days after you file this bankruptcy petition, you **MUST** file a copy of the certificate and payment plan, if any.

☒ I certify that I asked for credit counseling services from an approved agency, but was unable to obtain those services during the 7 days after I made my request, and exigent circumstances merit a 30-day temporary waiver of the requirement.

To ask for a 30-day temporary waiver of the requirement, attach a separate sheet explaining what efforts you made to obtain the briefing, why you were unable to obtain it before you filed for bankruptcy, and what exigent circumstances required you to file this case.

Your case may be dismissed if the court is dissatisfied with your reasons for not receiving a briefing before you filed for bankruptcy. If the court is satisfied with your reasons, you must still receive a briefing within 30 days after you file. You must file a certificate from the approved agency, along with a copy of the payment plan you developed, if any. If you do not do so, your case may be dismissed.

Any extension of the 30-day deadline is granted only for cause and is limited to a maximum of 15 days.

☐ I am not required to receive a briefing about credit counseling because of:

☐ **Incapacity.** I have a mental illness or a mental deficiency that makes me incapable of realizing or making rational decisions about finances.

☐ **Disability.** My physical disability causes me to be unable to participate in a briefing in person, by phone, or through the internet, even after I reasonably tried to do so.

☐ **Active duty.** I am currently on active military duty in a military combat zone.

If you believe you are not required to receive a briefing about credit counseling, you must file a motion for waiver of credit counseling with the court.

About Debtor 2 (Spouse Only in a Joint Case):

You must check one:

☐ I received a briefing from an approved credit counseling agency within the 180 days before I filed this bankruptcy petition, and I received a certificate of completion.

Attach a copy of the certificate and the payment plan, if any, that you developed with the agency.

☐ I received a briefing from an approved credit counseling agency within the 180 days before I filed this bankruptcy petition, but I do not have a certificate of completion.

Within 14 days after you file this bankruptcy petition, you **MUST** file a copy of the certificate and payment plan, if any.

☐ I certify that I asked for credit counseling services from an approved agency, but was unable to obtain those services during the 7 days after I made my request, and exigent circumstances merit a 30-day temporary waiver of the requirement.

To ask for a 30-day temporary waiver of the requirement, attach a separate sheet explaining what efforts you made to obtain the briefing, why you were unable to obtain it before you filed for bankruptcy, and what exigent circumstances required you to file this case.

Your case may be dismissed if the court is dissatisfied with your reasons for not receiving a briefing before you filed for bankruptcy.

If the court is satisfied with your reasons, you must still receive a briefing within 30 days after you file. You must file a certificate from the approved agency, along with a copy of the payment plan you developed, if any. If you do not do so, your case may be dismissed.

Any extension of the 30-day deadline is granted only for cause and is limited to a maximum of 15 days.

☐ I am not required to receive a briefing about credit counseling because of:

☐ **Incapacity.** I have a mental illness or a mental deficiency that makes me incapable of realizing or making rational decisions about finances.

☐ **Disability.** My physical disability causes me to be unable to participate in a briefing in person, by phone, or through the internet, even after I reasonably tried to do so.

☐ **Active duty.** I am currently on active military duty in a military combat zone.

If you believe you are not required to receive a briefing about credit counseling, you must file a motion for waiver of credit counseling with the court.

Debtor 1 Jeffrey Lew Liddle
First Name Middle Name Last Name

Case number (if known) _____

Part 6: Answer These Questions for Reporting Purposes

16. What kind of debts do you have?

16a. Are your debts primarily consumer debts? *Consumer debts* are defined in 11 U.S.C. § 101(8) as "incurred by an individual primarily for a personal, family, or household purpose."

- ☒ No. Go to line 16b.
☐ Yes. Go to line 17.

16b. Are your debts primarily business debts? *Business debts* are debts that you incurred to obtain money for a business or investment or through the operation of the business or investment.

- ☐ No. Go to line 16c.
☒ Yes. Go to line 17.

16c. State the type of debts you owe that are not consumer debts or business debts.

17. Are you filing under Chapter 7?

☒ No. I am not filing under Chapter 7. Go to line 18.

Do you estimate that after any exempt property is excluded and administrative expenses are paid that funds will be available for distribution to unsecured creditors?

- ☐ Yes. I am filing under Chapter 7. Do you estimate that after any exempt property is excluded and administrative expenses are paid that funds will be available to distribute to unsecured creditors?
☐ No
☐ Yes

18. How many creditors do you estimate that you owe?

- ☒ 1-49
☐ 50-99
☐ 100-199
☐ 200-999
☐ 1,000-5,000
☐ 5,001-10,000
☐ 10,001-25,000
☐ 25,001-50,000
☐ 50,001-100,000
☐ More than 100,000

19. How much do you estimate your assets to be worth?

- ☐ \$0-\$50,000
☐ \$50,001-\$100,000
☐ \$100,001-\$500,000
☐ \$500,001-\$1 million
☒ \$1,000,001-\$10 million
☐ \$10,000,001-\$50 million
☐ \$50,000,001-\$100 million
☐ \$100,000,001-\$500 million
☐ \$500,000,001-\$1 billion
☐ \$1,000,000,001-\$10 billion
☐ \$10,000,000,001-\$50 billion
☐ More than \$50 billion

20. How much do you estimate your liabilities to be?

- ☐ \$0-\$50,000
☐ \$50,001-\$100,000
☐ \$100,001-\$500,000
☐ \$500,001-\$1 million
☐ \$1,000,001-\$10 million
☒ \$10,000,001-\$50 million
☐ \$50,000,001-\$100 million
☐ \$100,000,001-\$500 million
☐ \$500,000,001-\$1 billion
☐ \$1,000,000,001-\$10 billion
☐ \$10,000,000,001-\$50 billion
☐ More than \$50 billion

Part 7: Sign Below

For you

I have examined this petition, and I declare under penalty of perjury that the information provided is true and correct.

If I have chosen to file under Chapter 7, I am aware that I may proceed, if eligible, under Chapter 7, 11, 12, or 13 of title 11, United States Code. I understand the relief available under each chapter, and I choose to proceed under Chapter 7.

If no attorney represents me and I did not pay or agree to pay someone who is not an attorney to help me fill out this document, I have obtained and read the notice required by 11 U.S.C. § 342(b).

I request relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I understand making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$250,000, or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 1593, 1594, 1595, 1619, and 3571.

X

Signature of Debtor 1

Executed on 3/11/2019
MM / DD / YYYY

X

Signature of Debtor 2

Executed on _____
MM / DD / YYYY

Debtor 1

Jeffrey Lew Liddle

First Name

Middle Name

Last Name

Case number (if known)

For your attorney, if you are represented by one

If you are not represented by an attorney, you do not need to file this page.

I, the attorney for the debtor(s) named in this petition, declare that I have informed the debtor(s) about eligibility to proceed under Chapter 7, 11, 12, or 13 of title 11, United States Code, and have explained the relief available under each chapter for which the person is eligible. I also certify that I have delivered to the debtor(s) the notice required by 11 U.S.C. § 342(b) and, in a case in which § 707(b)(4)(D) applies, certify that I have no knowledge after an inquiry that the information in the schedules filed with the petition is incorrect.

X

Signature of Attorney for Debtor

Date

MM / DD / YYYY

Printed name

Firm name

Number Street

City

State

ZIP Code

Contact phone

Email address

Bar number

State

Debtor 1

Jeffrey Lew Liddle

First Name Middle Name Last Name

Case number (if known)

For you if you are filing this bankruptcy without an attorney

If you are represented by an attorney, you do not need to file this page.

The law allows you, as an individual, to represent yourself in bankruptcy court, but **you should understand that many people find it extremely difficult to represent themselves successfully. Because bankruptcy has long-term financial and legal consequences, you are strongly urged to hire a qualified attorney.**

To be successful, you must correctly file and handle your bankruptcy case. The rules are very technical, and a mistake or inaction may affect your rights. For example, your case may be dismissed because you did not file a required document, pay a fee on time, attend a meeting or hearing, or cooperate with the court, case trustee, U.S. trustee, bankruptcy administrator, or audit firm if your case is selected for audit. If that happens, you could lose your right to file another case, or you may lose protections, including the benefit of the automatic stay.

You must list all your property and debts in the schedules that you are required to file with the court. Even if you plan to pay a particular debt outside of your bankruptcy, you must list that debt in your schedules. If you do not list a debt, the debt may not be discharged. If you do not list property or properly claim it as exempt, you may not be able to keep the property. The judge can also deny you a discharge of all your debts if you do something dishonest in your bankruptcy case, such as destroying or hiding property, falsifying records, or lying. Individual bankruptcy cases are randomly audited to determine if debtors have been accurate, truthful, and complete. **Bankruptcy fraud is a serious crime; you could be fined and imprisoned.**

If you decide to file without an attorney, the court expects you to follow the rules as if you had hired an attorney. The court will not treat you differently because you are filing for yourself. To be successful, you must be familiar with the United States Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and the local rules of the court in which your case is filed. You must also be familiar with any state exemption laws that apply.

Are you aware that filing for bankruptcy is a serious action with long-term financial and legal consequences?

- ☐ No
☒ Yes

Are you aware that bankruptcy fraud is a serious crime and that if your bankruptcy forms are inaccurate or incomplete, you could be fined or imprisoned?

- ☐ No
☒ Yes

Did you pay or agree to pay someone who is not an attorney to help you fill out your bankruptcy forms?

- ☒ No
☐ Yes. Name of Person _____

Attach Bankruptcy Petition Preparer's Notice, Declaration, and Signature (Official Form 119).

By signing here, I acknowledge that I understand the risks involved in filing without an attorney. I have read and understood this notice, and I am aware that filing a bankruptcy case without an attorney may cause me to lose my rights or property if I do not properly handle the case.

x

Signature of Debtor 1

Date

MM/DD/YYYY

Contact phone

Cell phone

Email address

x

Signature of Debtor 2

Date

MM/DD/YYYY

Contact phone

Cell phone

Email address

Fill in this information to identify your case:

Debtor 1 Jeffrey Lew Liddle
First Name Middle Name Last Name

Debtor 2
(Spouse, if filing) _____
First Name Middle Name Last Name

United States Bankruptcy Court for the: Southern District of New York

Case number _____
(If known)

☐ Check if this is an amended filing

Official Form 106Sum

Summary of Your Assets and Liabilities and Certain Statistical Information

12/15

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. Fill out all of your schedules first; then complete the information on this form. If you are filing amended schedules after you file your original forms, you must fill out a new *Summary* and check the box at the top of this page.

Part 1: Summarize Your Assets

	Your assets Value of what you own
1. <i>Schedule A/B: Property</i> (Official Form 106A/B)	
1a. Copy line 55, Total real estate, from <i>Schedule A/B</i>	\$ 5,100,000.00
1b. Copy line 62, Total personal property, from <i>Schedule A/B</i>	\$ 250,000.00
1c. Copy line 63, Total of all property on <i>Schedule A/B</i>	\$ 5,350,000.00

Part 2: Summarize Your Liabilities

	Your liabilities Amount you owe
2. <i>Schedule D: Creditors Who Have Claims Secured by Property</i> (Official Form 106D)	
2a. Copy the total you listed in Column A, <i>Amount of claim</i> , at the bottom of the last page of Part 1 of <i>Schedule D</i>	\$ 2,800,000.00
3. <i>Schedule E/F: Creditors Who Have Unsecured Claims</i> (Official Form 106E/F)	
3a. Copy the total claims from Part 1 (priority unsecured claims) from line 6e of <i>Schedule E/F</i>	\$ _____
3b. Copy the total claims from Part 2 (nonpriority unsecured claims) from line 6j of <i>Schedule E/F</i>	+ \$ _____
Your total liabilities	\$ 2,800,000.00

Part 3: Summarize Your Income and Expenses

4. <i>Schedule I: Your Income</i> (Official Form 106I)	
Copy your combined monthly income from line 12 of <i>Schedule I</i>	\$ _____
5. <i>Schedule J: Your Expenses</i> (Official Form 106J)	
Copy your monthly expenses from line 22c of <i>Schedule J</i>	\$ 20,000.00

Debtor 1 Jeffrey Lew Liddle
First Name Middle Name Last Name

Case number (if known) _____

Part 4: Answer These Questions for Administrative and Statistical Records

6. Are you filing for bankruptcy under Chapters 7, 11, or 13?

- ☐ No. You have nothing to report on this part of the form. Check this box and submit this form to the court with your other schedules.
☒ Yes

7. What kind of debt do you have?

- ☐ Your debts are primarily consumer debts. *Consumer debts* are those "incurred by an individual primarily for a personal, family, or household purpose." 11 U.S.C. § 101(8). Fill out lines 8-9g for statistical purposes. 28 U.S.C. § 159.
☒ Your debts are not primarily consumer debts. You have nothing to report on this part of the form. Check this box and submit this form to the court with your other schedules.

8. From the Statement of Your Current Monthly Income: Copy your total current monthly income from Official Form 122A-1 Line 11; OR, Form 122B Line 11; OR, Form 122C-1 Line 14.

\$ 25,000.00

9. Copy the following special categories of claims from Part 4, line 6 of Schedule E/F:

Total claim

From Part 4 on Schedule E/F, copy the following:

9a. Domestic support obligations (Copy line 6a.)	\$ <u>0.00</u>
9b. Taxes and certain other debts you owe the government. (Copy line 6b.)	\$ <u>100,000.00</u>
9c. Claims for death or personal injury while you were intoxicated. (Copy line 6c.)	\$ <u>0.00</u>
9d. Student loans. (Copy line 6f.)	\$ <u>0.00</u>
9e. Obligations arising out of a separation agreement or divorce that you did not report as priority claims. (Copy line 6g.)	\$ <u>0.00</u>
9f. Debts to pension or profit-sharing plans, and other similar debts. (Copy line 6h.)	+ \$ <u>0.00</u>
9g. Total. Add lines 9a through 9f.	\$ <u>100,000.00</u>

Fill in this information to identify the case:

Debtor name Jeffrey Lew Liddle
United States Bankruptcy Court for the: Southern District of New York
(State)
Case number (If known): _____

☐ Check if this is an amended filing

Official Form 206D

Schedule D: Creditors Who Have Claims Secured by Property

12/15

Be as complete and accurate as possible.

1. Do any creditors have claims secured by debtor's property?

- ☐ No. Check this box and submit page 1 of this form to the court with debtor's other schedules. Debtor has nothing else to report on this form.
☐ Yes. Fill in all of the information below.

Part 1: List Creditors Who Have Secured Claims

2. List in alphabetical order all creditors who have secured claims. If a creditor has more than one secured claim, list the creditor separately for each claim.

Column A
Amount of claim
Do not deduct the value of collateral.

Column B
Value of collateral that supports this claim

<p>2.1 Creditor's name <u>M&T Bank</u></p> <p>Creditor's mailing address <u>P.O. Box 62182</u> <u>Baltimore, MD 21264</u></p> <p>Creditor's email address, if known _____</p> <p>Date debt was incurred _____</p> <p>Last 4 digits of account number _____</p> <p>Do multiple creditors have an interest in the same property? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Specify each creditor, including this creditor, and its relative priority. _____</p>	<p>Describe debtor's property that is subject to a lien <u>560 Main Street, Quogue, NY - one family home</u></p> <p>Describe the lien <u>Mortgage</u></p> <p>Is the creditor an insider or related party? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes</p> <p>Is anyone else liable on this claim? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Fill out Schedule H: Codebtors (Official Form 206H).</p> <p>As of the petition filing date, the claim is: Check all that apply. <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed</p>	<p>\$ <u>2,672,254.00</u></p>	<p>\$ _____</p>
<p>2.2 Creditor's name <u>Counsel Financial II, LLC</u></p> <p>Creditor's mailing address <u>c/o Larry Hatcher, Esq.</u> <u>605 Third Avenue, New York, NY 10158</u></p> <p>Creditor's email address, if known _____</p> <p>Date debt was incurred _____</p> <p>Last 4 digits of account number _____</p> <p>Do multiple creditors have an interest in the same property? <input type="checkbox"/> No <input type="checkbox"/> Yes. Have you already specified the relative priority? <input type="checkbox"/> No. Specify each creditor, including this creditor, and its relative priority. _____ <input type="checkbox"/> Yes. The relative priority of creditors is specified on lines _____</p>	<p>Describe debtor's property that is subject to a lien <u>554 Main Street, Quogue, NY - one family home</u> <u>560 Main Street, Quogue, NY - one family home</u> <u>Escrow Funds from sale of apartment, 11 5th Ave, NYC</u></p> <p>Describe the lien <u>Judgment</u></p> <p>Is the creditor an insider or related party? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes</p> <p>Is anyone else liable on this claim? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Fill out Schedule H: Codebtors (Official Form 206H).</p> <p>As of the petition filing date, the claim is: Check all that apply. <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed</p>	<p>\$ <u>6,546,448.83</u></p>	<p>\$ _____</p>
<p>3. Total of the dollar amounts from Part 1, Column A, including the amounts from the Additional Page, if any.</p>		<p>\$ _____</p>	

Debtor

Name

Case number (if known)

Part 1: Additional Page

Column A

Amount of claim

Do not deduct the value of collateral.

Column B

Value of collateral that supports this claim

Copy this page only if more space is needed. Continue numbering the lines sequentially from the previous page.

<p>2. Creditor's name</p> <p>_____</p> <p>Creditor's mailing address</p> <p>_____</p> <p>_____</p> <p>Creditor's email address, if known</p> <p>_____</p> <p>Date debt was incurred _____</p> <p>Last 4 digits of account number _____</p> <p>Do multiple creditors have an interest in the same property?</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes. Have you already specified the relative priority?</p> <p><input type="checkbox"/> No. Specify each creditor, including this creditor, and its relative priority.</p> <p>_____</p> <p>_____</p> <p><input type="checkbox"/> Yes. The relative priority of creditors is specified on lines _____</p>	<p>Describe debtor's property that is subject to a lien</p> <p>_____ \$ _____ \$ _____</p> <p>Describe the lien</p> <p>_____</p> <p>Is the creditor an insider or related party?</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes</p> <p>Is anyone else liable on this claim?</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes. Fill out <i>Schedule H: Codebtors</i> (Official Form 206H).</p> <p>As of the petition filing date, the claim is:</p> <p>Check all that apply.</p> <p><input type="checkbox"/> Contingent</p> <p><input type="checkbox"/> Unliquidated</p> <p><input type="checkbox"/> Disputed</p>
<p>2. Creditor's name</p> <p>_____</p> <p>Creditor's mailing address</p> <p>_____</p> <p>_____</p> <p>Creditor's email address, if known</p> <p>_____</p> <p>Date debt was incurred _____</p> <p>Last 4 digits of account number _____</p> <p>Do multiple creditors have an interest in the same property?</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes. Have you already specified the relative priority?</p> <p><input type="checkbox"/> No. Specify each creditor, including this creditor, and its relative priority.</p> <p>_____</p> <p>_____</p> <p><input type="checkbox"/> Yes. The relative priority of creditors is specified on lines _____</p>	<p>Describe debtor's property that is subject to a lien</p> <p>_____ \$ _____ \$ _____</p> <p>Describe the lien</p> <p>_____</p> <p>Is the creditor an insider or related party?</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes</p> <p>Is anyone else liable on this claim?</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes. Fill out <i>Schedule H: Codebtors</i> (Official Form 206H).</p> <p>As of the petition filing date, the claim is:</p> <p>Check all that apply.</p> <p><input type="checkbox"/> Contingent</p> <p><input type="checkbox"/> Unliquidated</p> <p><input type="checkbox"/> Disputed</p>

Name

Case number (if known)

List in alphabetical order any others who must be notified for a debt already listed in Part 1. Examples of entities that may be listed are collection agencies, assignees of claims listed above, and attorneys for secured creditors.

If no others need to be notified for the debts listed in Part 1, do not fill out or submit this page. If additional pages are needed, copy this page.

Form 206D

Fill in this information to identify your case:

Debtor 1 Jeffrey Lew Liddle
First Name Middle Name Last Name

Debtor 2 _____
(Spouse, if filing) First Name Middle Name Last Name

United States Bankruptcy Court for the: Southern District of New York

Case number _____
(If known)

FILED
U.S. BANKRUPTCY COURT
2019 MAR 11 P 12:05
S.D. OF N.Y.

☐ Check if this is an amended filing

Official Form 104

For Individual Chapter 11 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims Against You and Are Not Insiders

12/15

If you are an individual filing for bankruptcy under Chapter 11, you must fill out this form. If you are filing under Chapter 7, Chapter 12, or Chapter 13, do not fill out this form. Do not include claims by anyone who is an *insider*. Insiders include your relatives; any general partners; relatives of any general partners; partnerships of which you are a general partner; corporations of which you are an officer, director, person in control, or owner of 20 percent or more of their voting securities; and any managing agent, including one for a business you operate as a sole proprietor. 11 U.S.C. § 101. Also, do not include claims by secured creditors unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 20 largest unsecured claims.

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information.

Part 1: List the 20 Unsecured Claims in Order from Largest to Smallest. Do Not Include Claims by Insiders.

	Unsecured claim
<p>1</p> <p>Counsel Financial II, LLC</p> <p>Creditor's Name 605 Third Avenue Number Street Davidoff Hatcher & Citron, LLP New York NY 10158 City State ZIP Code c/o Larry Hatcher, Esq. Contact (212) 557-7200 Contact phone</p> <p>What is the nature of the claim? <u>Guarantor Obligation</u></p> <p>As of the date you file, the claim is: Check all that apply. <input checked="" type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input checked="" type="checkbox"/> Disputed <input type="checkbox"/> None of the above apply</p> <p>Does the creditor have a lien on your property? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Total claim (secured and unsecured): \$ <u>6,546,448.83</u></p> <p>Value of security: - \$ _____ Unsecured claim \$ _____</p>	<p>\$ <u>6,546,448.83</u></p>
<p>2</p> <p>M&T Bank</p> <p>Creditor's Name P.O. Box 62182 Number Street Baltimore MD 21264 City State ZIP Code Member Services Contact (302) 934-4872 Contact phone</p> <p>What is the nature of the claim? <u>Mortgage</u></p> <p>As of the date you file, the claim is: Check all that apply. <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed <input checked="" type="checkbox"/> None of the above apply</p> <p>Does the creditor have a lien on your property? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Total claim (secured and unsecured): \$ _____</p> <p>Value of security: - \$ _____ Unsecured claim \$ _____</p>	<p>\$ <u>2,672,254.00</u></p>

Debtor 1 **Jeffrey** **Lew** **Liddle**
First Name Middle Name Last Name

Case number (if known) _____

Unsecured claim

3	Counsel Financial Holdings, LLC Creditor's Name 6400 Main Street Number Street Suite 120 Williamsville NY 14221 City State ZIP Code Felice Callahan Contact (800) 820-4430 Contact phone	What is the nature of the claim? <u>Guarantor Obligation</u> \$ 1,906,621.00 As of the date you file, the claim is: Check all that apply. <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input checked="" type="checkbox"/> Disputed <input type="checkbox"/> None of the above apply Does the creditor have a lien on your property? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Total claim (secured and unsecured): \$ _____ Value of security: - \$ _____ Unsecured claim \$ _____
4	800 Third Avenue Associates, LLC Creditor's Name 10 East 40th Street Number Street 46th Floor New York NY 10016 City State ZIP Code c/o Jeffrey Klarsfeld, Esq. Contact (212) 726-4423 Contact phone	What is the nature of the claim? _____ \$ 426,000.00 As of the date you file, the claim is: Check all that apply. <input checked="" type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed <input type="checkbox"/> None of the above apply Does the creditor have a lien on your property? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Total claim (secured and unsecured): \$ 646,000.00 Value of security: - \$ 220,000.00 Unsecured claim \$ 426,000.00
5	LIG Capital, L.L.C. Creditor's Name 6400 Main Street Number Street Suite 120 Williamsville NY 14221 City State ZIP Code Megan Payne Contact (800) 820-4430 Contact phone	What is the nature of the claim? <u>Guarantor Obligation</u> \$ 634,910.04 As of the date you file, the claim is: Check all that apply. <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input checked="" type="checkbox"/> Disputed <input type="checkbox"/> None of the above apply Does the creditor have a lien on your property? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Total claim (secured and unsecured): \$ _____ Value of security: - \$ _____ Unsecured claim \$ _____
6	DeLage Landen Fin'l Services Inc. Creditor's Name 880 Fifth Avenue Number Street Suite 1401 New York NY 10011 City State ZIP Code c/o Bryan E. Wolkind, Esq. Contact (212) 691-2313 Contact phone	What is the nature of the claim? <u>Guarantee-Lease</u> \$ 197,310.50 As of the date you file, the claim is: Check all that apply. <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed <input type="checkbox"/> None of the above apply Does the creditor have a lien on your property? <input type="checkbox"/> No <input type="checkbox"/> Yes. Total claim (secured and unsecured): \$ _____ Value of security: - \$ _____ Unsecured claim \$ _____
7	Kasowitz Benson Torres LLP Creditor's Name 1633 Broadway Number Street New York NY 10019 City State ZIP Code Joshua Siegel, Esq. Contact (212) 506-1700 Contact phone	What is the nature of the claim? <u>Legal Fees</u> \$ 189,257.35 As of the date you file, the claim is: Check all that apply. <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input checked="" type="checkbox"/> Disputed <input type="checkbox"/> None of the above apply Does the creditor have a lien on your property? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Total claim (secured and unsecured): \$ _____ Value of security: - \$ _____ Unsecured claim \$ _____

Debtor 1 Jeffrey Lew Liddle
First Name Middle Name Last Name

Case number (if known) _____

Unsecured claim

8 Dr. Areta Podhorodecki
Creditor's Name
44 St. Marks Place
Number Street
New York NY 10003
City State ZIP Code
Dr. Areta Podhorodecki
Contact
(212) 529-5966
Contact phone

What is the nature of the claim? Personal Loan \$ 140,000.00
As of the date you file, the claim is: Check all that apply.
☐ Contingent
☐ Unliquidated
☐ Disputed
☒ None of the above apply
Does the creditor have a lien on your property?
☒ No
☐ Yes. Total claim (secured and unsecured): \$ _____
Value of security: - \$ _____
Unsecured claim \$ _____

9 Eisner, P.C.
Creditor's Name
152 West 57th Street
Number Street
48th Floor
New York NY 10019
City State ZIP Code
Michael Eisner
Contact
(646) 876-2600
Contact phone

What is the nature of the claim? Legal Fees \$ 134,947.84
As of the date you file, the claim is: Check all that apply.
☐ Contingent
☐ Unliquidated
☒ Disputed
☐ None of the above apply
Does the creditor have a lien on your property?
☒ No
☐ Yes. Total claim (secured and unsecured): \$ _____
Value of security: - \$ _____
Unsecured claim \$ _____

10 Anthony Losquadro
Creditor's Name
4986 SouthEast Inkwood Way
Number Street
Hobe Sound FL 33455
City State ZIP Code
Contact
(631) 921-2682
Contact phone

What is the nature of the claim? Personal Loan \$ 100,000.00
As of the date you file, the claim is: Check all that apply.
☐ Contingent
☐ Unliquidated
☐ Disputed
☒ None of the above apply
Does the creditor have a lien on your property?
☒ No
☐ Yes. Total claim (secured and unsecured): \$ _____
Value of security: - \$ _____
Unsecured claim \$ _____

11 Bret Losquadro
Creditor's Name
19 The Green
Number Street
South Shore Auto Works
Shirley NY 11967
City State ZIP Code
Bret Losquadro
Contact
(631) 281-0572
Contact phone

What is the nature of the claim? Personal Loan \$ 100,000.00
As of the date you file, the claim is: Check all that apply.
☐ Contingent
☐ Unliquidated
☐ Disputed
☒ None of the above apply
Does the creditor have a lien on your property?
☒ No
☐ Yes. Total claim (secured and unsecured): \$ _____
Value of security: - \$ _____
Unsecured claim \$ _____

12 Quintus Von Bonin
Creditor's Name
131 Mercer Street
Number Street
Apt 3A
New York NY 10012
City State ZIP Code
Contact
(917) 913-2730
Contact phone

What is the nature of the claim? Personal Loan \$ 100,000.00
As of the date you file, the claim is: Check all that apply.
☐ Contingent
☐ Unliquidated
☐ Disputed
☒ None of the above apply
Does the creditor have a lien on your property?
☒ No
☐ Yes. Total claim (secured and unsecured): \$ _____
Value of security: - \$ _____
Unsecured claim \$ _____

Debtor 1 Jeffrey Lew Liddle
First Name Middle Name Last Name

Case number (if known) _____

Unsecured claim

13	Blank Rome <small>Creditor's Name</small> <u>130 North 18th Street</u> <small>Number Street</small> <u>Philadelphia</u> <u>PA</u> <u>19103</u> <small>City State ZIP Code</small> <u>Lisa McLeod</u> <small>Contact</small> <u>(215) 988-3084</u> <small>Contact phone</small>	<p>What is the nature of the claim? <u>Legal Fees</u> \$ <u>83,269.58</u></p> <p>As of the date you file, the claim is: Check all that apply.</p> <p><input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input checked="" type="checkbox"/> Disputed <input type="checkbox"/> None of the above apply</p> <p>Does the creditor have a lien on your property? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Total claim (secured and unsecured): \$ _____ Value of security: - \$ _____ Unsecured claim \$ _____</p>
14	Citibank Mastercard <small>Creditor's Name</small> <u>6716 Grade Lane</u> <small>Number Street</small> <u>Building 9, Suite 910</u> <u>Louisville</u> <u>KY</u> <u>40213</u> <small>City State ZIP Code</small> <u>Customer Service</u> <small>Contact</small> <u>(888) 766-2484</u> <small>Contact phone</small>	<p>What is the nature of the claim? <u>Credit Card Balance</u> \$ <u>67,070.00</u></p> <p>As of the date you file, the claim is: Check all that apply.</p> <p><input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed <input checked="" type="checkbox"/> None of the above apply</p> <p>Does the creditor have a lien on your property? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Total claim (secured and unsecured): \$ _____ Value of security: - \$ _____ Unsecured claim \$ _____</p>
15	Town of Southampton <small>Creditor's Name</small> <u>116 Hampton Road</u> <small>Number Street</small> <u>Southampton</u> <u>NY</u> <u>11968</u> <small>City State ZIP Code</small> <small>Contact</small> <u>(631) 702-2470</u> <small>Contact phone</small>	<p>What is the nature of the claim? <u>Real Estate Taxes</u> \$ <u>67,000.00</u></p> <p>As of the date you file, the claim is: Check all that apply.</p> <p><input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed <input type="checkbox"/> None of the above apply</p> <p>Does the creditor have a lien on your property? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Total claim (secured and unsecured): \$ _____ Value of security: - \$ _____ Unsecured claim \$ _____</p>
16	White & Wolnerman <small>Creditor's Name</small> <u>950 Third Avenue</u> <small>Number Street</small> <u>11th Floor</u> <u>New York</u> <u>NY</u> <u>10022</u> <small>City State ZIP Code</small> <u>Randolph White</u> <small>Contact</small> <u>(212) 308-0604</u> <small>Contact phone</small>	<p>What is the nature of the claim? <u>Legal Fees</u> \$ <u>46,893.00</u></p> <p>As of the date you file, the claim is: Check all that apply.</p> <p><input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed <input checked="" type="checkbox"/> None of the above apply</p> <p>Does the creditor have a lien on your property? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Total claim (secured and unsecured): \$ _____ Value of security: - \$ _____ Unsecured claim \$ _____</p>
17	New York State Dept Tax Finance <small>Creditor's Name</small> <u>15 Metrotech Ctr</u> <small>Number Street</small> <u>Ste 4</u> <u>Brooklyn</u> <u>NY</u> <u>11201</u> <small>City State ZIP Code</small> <u>Audit Division</u> <small>Contact</small> <u>(518) 457-5434</u> <small>Contact phone</small>	<p>What is the nature of the claim? <u>Bus Sales Tax Obligation</u> \$ <u>35,000.00</u></p> <p>As of the date you file, the claim is: Check all that apply.</p> <p><input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed <input type="checkbox"/> None of the above apply</p> <p>Does the creditor have a lien on your property? <input type="checkbox"/> No <input type="checkbox"/> Yes. Total claim (secured and unsecured): \$ _____ Value of security: - \$ _____ Unsecured claim \$ _____</p>

Debtor 1 Jeffrey Lew Liddle
First Name Middle Name Last Name

Case number (if known) _____

Unsecured claim

18 Richard Kates What is the nature of the claim? Personal Loan \$ 25,000.00

Creditor's Name
47 Mercer Street
Number Street
5th Floor
City State ZIP Code
New York NY 10013
Contact
(917) 767-7334
Contact phone

As of the date you file, the claim is: Check all that apply.

- ☐ Contingent
☐ Unliquidated
☐ Disputed
☒ None of the above apply

Does the creditor have a lien on your property?

- ☒ No
☐ Yes. Total claim (secured and unsecured): \$ _____
Value of security: - \$ _____
Unsecured claim \$ _____

19 James Forbes What is the nature of the claim? Personal Loan \$ 25,000.00

Creditor's Name
50 East 72nd Street
Number Street
Apt 13-14 B
City State ZIP Code
New York NY 10021
Contact
(917) 576-2265
Contact phone

As of the date you file, the claim is: Check all that apply.

- ☐ Contingent
☐ Unliquidated
☐ Disputed
☒ None of the above apply

Does the creditor have a lien on your property?

- ☒ No
☐ Yes. Total claim (secured and unsecured): \$ _____
Value of security: - \$ _____
Unsecured claim \$ _____

20 Zenon B. Chernyk What is the nature of the claim? Personal Loan \$ 25,000.00

Creditor's Name
46 St. Marks Place
Number Street
Apt 3
City State ZIP Code
New York NY 10003
Contact
(646) 594-4696
Contact phone

As of the date you file, the claim is: Check all that apply.

- ☐ Contingent
☐ Unliquidated
☐ Disputed
☒ None of the above apply

Does the creditor have a lien on your property?

- ☒ No
☐ Yes. Total claim (secured and unsecured): \$ _____
Value of security: - \$ _____
Unsecured claim \$ _____

Part 2: Sign Below

Under penalty of perjury, I declare that the information provided in this form is true and correct.

x

Signature of Debtor 1

Date 3/11/2019
MM / DD / YYYY

x

Signature of Debtor 2

Date _____
MM / DD / YYYY

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

Index No.

-----X

IN RE:

JEFFREY L. LIDDLE,

**AFFIDAVIT OF
JEFFREY L. LIDDLE UNDER
BANKRUPTCY RULE 1007-2**

Debtor

-----X

STATE OF NEW YORK :
SS:
COUNTY OF NEW YORK :

Jeffrey L. Liddle, being duly sworn, deposes and says:

1. I am an attorney in New York and have been a partner in the law firm known as Liddle & Robinson, L.L.P. (the "Firm" or "Liddle & Robinson") since it was originally formed June 4, 1979. This petition is filed on an **urgent** basis because of efforts by a creditor to enforce a judgment in the amount of \$6,546,448.83 that has been entered in Supreme Court Erie County against the Firm and myself as guarantor (up to \$6 million) on March 7, 2019. An Order of Attachment was also granted in Erie County on March 7, 2019 over my personal assets, putatively including my interest in an escrow account maintained in New York City, holding the net proceeds of the sale of my wife's and my cooperative apartment.¹

2. In support of the judgment, plaintiff Counsel Financial II, LLC (the "Lender") is seeking to and has obtained an "direction" from the Judge in Erie County to force the escrow agent to transfer the entire Escrow Funds by no later than tomorrow, March 12, 2019 to

¹ 1. In a gross overreach, the attachment order purports to grant the attachment over my wife's property too, i.e., her 50% interest in the \$2,181,207.77 proceeds of the sale of the property held by us as tenants in the entirety, even though she was not a party to the underlying action, never served with any process, was not a borrower and/or guarantor on the underlying transaction, or has any other connection to the case other than being my wife.

the Court Registry of the Erie County Supreme Court. The Judgment has not been docketed in New York County. The proceeds include approximately \$1,090,000.00, representing my 50% total in the sale proceeds of the cooperative shares of the apartment at 11 5th Avenue, Apartment 19MN, New York, New York 10003, which was held as tenancy by the entirety with my wife, Tara Liddle. (Included in my share is that part of the property which I am entitled to exclude from creditor claims as a homestead exemption).

3. The transfer of the escrow funds will lead to the piecemeal dismemberment of my estate for the benefit of a single creditor. The attachment (and previously the 78 days of a TRO granted without notice, ex parte, and without legal support) has deprived me of the use of the proceeds even to retain a lawyer to handle this Chapter 11 filing and to consummate a restructuring of my and the Firm's debts with my, and its, other creditors. It also threatens my ability to continue the active practice of law which includes at this time over thirty active litigations and dozens of other matters, which will produce fees for the payment of creditor claims. Indeed, I have 15 cases which I expect to try in 2019, alone.

4. In addition to the threat posed by this transfer, the Lender has, acting in concert with former partners of the Firm, directed fee-paying clients to pay the Lender directly rather than pay the Firm the fees due for services rendered. This diversion of payment has choked off the Firm's revenues prompting severe financial distress.²

5. The Judgment and Order of Attachment have each been appealed. The attachment and attempts to transfer the escrowed funds lack any jurisdictional foundation, offend the most basic notions of due process and are procedurally defective. My ability to bond such an

² As the sole remaining partner, I will be also seeking to file Liddle & Robinson for chapter 11 reorganization relief in this District as soon as practicable.

amount does not exist. Therefore, the appeals could well be academic without the protection I seek in this Court.

Nature of Debtor's Business

6. Since its original formation over 39 years ago, the Firm has always had a strong litigation practice with an emphasis on corporate, real estate and employment law. Revenues net of expense reimbursement from 1998 or earlier, through 2015, averaged about \$13.5 million per year. This revenue generated a significant profit in virtually every year. The business declined with the departures of three partners between April 2015 and January 2016. Associate departures, and two more partner departures in mid-2016, led to further reduced revenue, if for no other reason than the ability to handle the litigation was reduced due to a smaller contingent of attorneys. The generation of new business and the level of existing business remained robust. The Firm still has a valuable practice that can be reorganized, including over 30 ongoing litigation matters.

7. No prior filings under Chapter 7, or seeking similar relief, have occurred. No trustees or receivers have been previously appointed.

8. No creditor committees have been previously organized related to this matter.

9. A list of the 20 largest unsecured creditors is attached as Official Form 104.

10. A list of the Largest Secured Creditors is attached as Schedule D.

11. A summary my assets and liabilities is attached as Official Form 106

Summary.

12. A list of the assets held by a custodian is attached as “Assets in Custodial Accounts.” As discussed, this includes a fifty percent (50%) share of an escrow amount held by Diane C. Nardone, Esq. telephone number (917) 318-7739, at 11 Fifth Avenue, New York, New York 10003, at First Republic Bank in New York City in the total amount of \$2,181,207.77. The escrow agent (Nardone) has been sued in New York County Supreme Court by Tara Liddle, the owner of the other 50% of the escrow amount in the case of Tara Liddle, plaintiff v. Diane C. Nardone, defendant/stakeholder, Index Number 651239-2019 (Hon. Barry R. Ostrager, J.S.C.).

Liddle & Robinson Operations

13. As mentioned, I am the sole remaining partner of Liddle & Robinson now operating the business effectively as a sole proprietorship. The Firm leases offices at 1177 Avenue of the Americas, 5th Floor, New York, New York 10036. There are no other offices. I am the manager of the Firm. All other partners have departed, the last on or about January 14, 2019. I intend to continue to operate the business of the Firm. Estimated payroll of the Firm for the next 30 days is approximately \$40,000. I intend to pay myself as manager of the Firm approximately \$25,000, subject to collections.

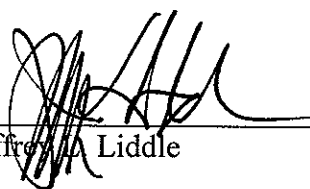
14. All of my personal assets are located in New York and Suffolk Counties, New York and none are located outside the territorial limits of the United States. A portion of my personal financial records are held in storage with Globe Storage & Moving Co., Inc., 665 Broadway, Suite 301, New York, NY 10012.

15. A list of actions where a judgment has been obtained or is imminent is attached as “List of Judgments or Imminent Actions.”

16. The most imminent threat is the Order of Attachment. Counsel Financial II, LLC vs. Liddle & Robinson, L.L.P., et al., Erie County Supreme Court, Index No. 814703/2018,


judgment entered against two of four defendants, Liddle & Robinson, L.L.P. and Jeffrey L. Liddle, as guarantor. Two defendant guarantors, Blaine H. Bortnick (\$5.5 million) and James R. Hubbard (\$5.5 million), have “settled” recently with Counsel Financial for undisclosed amounts and upon unknown terms. The Court in the above action entered a “temporary restraining order” against the transfer, assignment, etc. of personal property of mine under CPLR 6210 on December 19, 2018 even though the CPLR clearly does not allow such an action by the Court, since CPLR 6210 only is available against garnishees. Apparently, the TRO “remained in effect” even though the Court, now knowing there was no authority to issue it, refuses to say so. Erie County is the venue of that case only because of a contractual provision between the parties to Counsel Financial’s suit. Erie County is where Counsel Financial II, L.L.C. resides; significantly, there is no nexus to Erie County otherwise. The commencement of this case will automatically stay the transfer of the escrow funds out of New York County to Erie County in order to satisfy the Lender’s claims.

17. It is my belief and hope that under the protections granted by Chapter 11, I will be able to continue a strong practice, develop a consensual plan for creditors or payment of at the very least manage an orderly disposition of my and the Firm’s affairs.



Jeffrey L. Liddle

Sworn and subscribed to this
11th day of March, 2019.



Notary Public

ROSE M. REVERENDO
NOTARY PUBLIC, STATE OF NEW YORK
Registration No. 01RE4908329
Qualified in New York County
Commission Expires February 28, 2022

In Re: Jeffrey Lew Liddle, Debtor

LIST OF ASSETS IN CUSTODIAL ACCOUNTS

IOLA Escrow Account of Diane C. Nardone, Esq.
First Republic Bank Branch
New York, New York 1003
Amount: \$2,181,207.77

In Re: Jeffrey Lew Liddle, Debtor

LIST OF JUDGMENTS OR IMMINENT ACTIONS

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ERIE

COUNSEL FINANCIAL II LLC v. LIDDLE & ROBINSON LLP, JEFFREY L.
LIDDLE, BLAINE H. BORTNICK, and JAMES RYAN HUBBARD

Index No. 814703/2018

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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

KASOWITZ BENSON TORRES LLP v. JEFFREY L. LIDDLE AND LIDDLE &
ROBINSON LLP

Index No. 150623-2018

In Re: JEFFREY L. LIDDLE, Debtor

List of Creditors

Aphrodite Cleaners
30 University Place
New York, NY 10003

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