

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

In re: ) Case No. 10-50494  
)  
FAIR FINANCE COMPANY ) Chapter 7  
)  
Debtor. ) Judge Jessica E. Price Smith  
)

NOTICE OF MOTION

Brian A. Bash, Trustee, has filed papers with the Court requesting authority to employ and retain Marcum LLP to replace Skoda, Minotti & Co., as forensic accountant to the Trustee.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this Bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

**In accordance with Local Rule 9013-1(a) any objection of the relief requested must be filed within fourteen (14) days of the date of this Notice.** If you do not want the Court to grant the relief requested or if you want the Court to consider your views on the Motion, then on or before fourteen (14) days from the filing of this notice, or **January 23, 2020**, you or your attorney must:

File with the Court a written request explaining your position at:

Clerk of Courts  
United States Bankruptcy Court  
Howard M. Metzenbaum U.S. Courthouse  
201 Superior Avenue  
Cleveland, Ohio 44114-1235

If you mail your response to the Court for filing, you must mail it early enough so the Court will **receive** it on or before the date stated above.

You must also mail a copy to:

Brian A. Bash, Trustee  
Key Tower  
127 Public Square, Suite 2000  
Cleveland, Ohio 44114-1214



105049420010900000000002

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an Order granting that relief without conducting a hearing.

Date: January 9, 2020

Respectfully submitted,

*/s/ Alexis C. Beachdell*

---

Brian A. Bash (0000134)  
Alexis C. Beachdell (0083642)  
BAKER & HOSTETLER LLP  
Key Tower  
127 Public Square, Suite 2000  
Cleveland, Ohio 44114-1214  
Telephone: 216.621.0200  
Facsimile: 216.696.0740  
abeachdell@bakerlaw.com

*Counsel for the Trustee*

## CERTIFICATE OF SERVICE

A copy of the foregoing has been served via ECF or regular, U.S. Mail, on January 9, 2020,  
on the attached service list.

*/s/ Alexis C. Beachdell*

---

Alexis C. Beachdell

*Counsel for the Trustee*

## SERVICE LIST

### Electronic Mail Notice List

The following is the list of **parties** who are currently on the list to receive e-mail notice/service for this case.

- Richard M Bain bain@buckleyking.com, krupa@buckleyking.com
- Stephen M. Bales sbales@zieglermetzger.com, dmalloy@zieglermetzger.com
- Brian A Bash bashtrustee@bakerlaw.com, bbash@ecf.epiqsystems.com
- Brian A. Bash BBash@bakerlaw.com
- Brian A. Bash bashtrustee@bakerlaw.com, bbash@ecf.epiqsystems.com
- John E. Bator jbator@batorlaw.com, sbator@batorlaw.com
- Alexis Beachdell abeachdell@bakerlaw.com, fairfinancedocket@bakerlaw.com
- Kathryn A. Belfance kb@rlblp.com
- John B. Blanton jblanton@bakerlaw.com
- Thomas J Budd disneydiver@me.com, law@disneydiver.com
- Kelly Burgan kborgan@bakerlaw.com
- Patrick W. Carothers pcarothers@leechtishman.com, bankruptcy@leechtishman.com;ghauswirth@leechtishman.com;dtomko@leechtishman.com
- Anthony J. Cespedes ajc1253@yahoo.com
- William Gregory Chris wchris@rlblp.com, hkoerner@rlblp.com
- Michael L. Cioffi cioffi@blankrome.com
- LeGrand L Clark legrand.clark@atg.in.gov, stephanie.patrick@atg.in.gov
- Deborah A. Coleman dacoleman@hahnlaw.com, hlpcr@hahnlaw.com;mcsoulsby@hahnlaw.com;cmbeitel@hahnlaw.com
- Anthony J DeGirolamo ajdlaw@sbcglobal.net, amber\_weaver@sbcglobal.net;G23630@notify.cincompass.com
- Rocco I. Debitetto ridebitetto@hahnlaw.com, cmbeitel@hahnlaw.com
- Duriya Dhinojwala ddhinojwala@bmdllc.com, ddhinojwala@icloud.com
- Michelle DiBartolo-Haglock mdibartolo@ttmlaw.com, mldibartolo@gmail.com
- Breaden M. Douthett bdouthett@bakerlaw.com, fairfinancedocket@bakerlaw.com
- J Douglas Drushal ddrushal@ccj.com, lehman@ccj.com
- Charles R. Dyas charles.dyas@btlaw.com
- Robert W. Eckinger rwe@eckingerlaw.com
- Joseph Esmont jesmont@bakerlaw.com, joe.esmont@gmail.com;cbkfuturesinc@bakerlaw.com
- Joseph Esmont jesmont@bakerlaw.com, joe.esmont@gmail.com;cbkfuturesinc@bakerlaw.com
- Joseph E. Ezzie jezzie@bakerlaw.com
- Gregory R Farkas gfarkas@frantzward.com, dlbeatrice@frantzward.com
- Adam Lee Fletcher afletcher@bakerlaw.com
- Dov Frankel dfrankel@taftlaw.com, BHORVATH@TAFTLAW.COM;CLE\_Docket\_Assist@taftlaw.com
- Leon Friedberg lfriedberg@cpmlaw.com, efiling@cpmlaw.com
- Ronald P. Friedberg rfriedberg@meyersroman.com, vvardon@meyersroman.com
- Marc P Gertz mpgertz@goldman-rosen.com, debm@goldman-rosen.com
- Matthew Gold courts@argopartners.net
- Eric R. Goodman egoodman@bakerlaw.com
- Harry W. Greenfield bankpleadings@bucklaw.com, young@buckleyking.com;toole@buckleyking.com;heberlein@buckleyking.com
- Harry W. Greenfield greenfield@buckleyking.com, young@buckleyking.com;toole@buckleyking.com;heberlein@buckleyking.com
- John J Guy johnguy@neo.rr.com
- John J Guy johnguy@neo.rr.com
- Adam Bradley Hall amps@manleydeas.com
- Scott Holbrook sholbrook@bakerlaw.com
- H Ritchey Hollenbaugh hrh@cpmlaw.com, knocera@cpmlaw.com;slq@cpmlaw.com
- Rachel Huston rachel.huston@ohioattorneygeneral.gov
- Joseph F. Hutchinson jhutchinson@bakerlaw.com, sszalay@bakerlaw.com
- Steven G Janik , 8382591420@filings.docketbird.com
- Steven G Janik steven.janik@janiklaw.com, 8382591420@filings.docketbird.com

- Cynthia A Jeffrey bknotice@reimerlaw.com
- Kenneth C Johnson kjohnson@bricker.com, lpickett@bricker.com
- Nathaniel R. Jones jones-n@blankrome.com
- Mitchell A. Karlan mkarlan@gibsondunn.com, ldunst@gibsondunn.com;nhart@gibsondunn.com;blutz@gibsondunn.com;mao@gibsondunn.com
- Patrick J Keating pkeating@bdblaw.com, sconard@bdblaw.com
- Scott J. Kelly scottkelly@skellylaw.com
- David Charles Knowlton dck@kckblaw.com
- John F Kostelnik jkostelnik@frantzward.com, dlbeatrice@frantzward.com
- Stuart A. Laven slaven@cavitch.com
- James Michael Lawniczak jlawniczak@calfee.com
- Trish D. Lazich trish.lazich@ohioattorneygeneral.gov, angelique.dennis-noland@ohioattorneygeneral.gov
- Stephen P Leiby sleiby@neolaw.biz, jackie@neolaw.biz
- Scott B. Lepene scott.lepene@thompsonhine.com, Christine.Broz@thompsonhine.com;ECFDocket@thompsonhine.com
- Jeffrey M. Levinson jml@jml-legal.com
- Patrick T. Lewis plewis@bakerlaw.com, sjeney@bakerlaw.com
- Quintin F. Lindsmith qlindsmith@bricker.com, cwarner@bricker.com
- David A Looney David@OhioAttorney.com, davelooney1@gmail.com
- Bruce J.L. Lowe blowe@taftlaw.com, CLE\_Docket\_Assist@taftlaw.com;SMcKean@taftlaw.com
- Thomas R Lucchesi tlucchesi@bakerlaw.com
- Thomas R Lucchesi tlucchesi@bakerlaw.com
- Crystal L. Maluchnik crystal.maluchnik@janiklaw.com
- Crystal L. Maluchnik crystal.maluchnik@janiklaw.com
- Grant A Mason gamason@millermast.com
- Matthew H Matheney mmatheney@bdblaw.com, bhajduk@bdblaw.com
- Shorain L. McGhee shorain@smcgeeelaw.com
- David W. Mellott dmellott@beneschlaw.com
- Tarek E. Mercho tmercho@mercholegal.com
- David P. Meyer dmeyer@dmlaws.com, docket@dmlaws.com
- David Polan Meyer dmeyer@dmlaws.com
- Michael J Moran mike@gibsonmoran.com, moranecf@gmail.com;r55982@notify.bestcase.com
- Michael J Moran moranecf@yahoo.com, moranecf@gmail.com;r55982@notify.bestcase.com
- David A Mucklow davidamucklow@yahoo.com
- David A Mucklow davidamucklow@yahoo.com
- Steven J. Mulligan stevenmulligan@cox.net
- Maritza S. Nelson mnelson@bakerlaw.com
- F. Anthony Paganelli tony@tonypaganelli.com
- Lucas Keith Palmer palmer@ccj.com, aaichele@ralaw.com
- David C. Perduk dperduk@perduklaw.com, jody@perduklaw.com
- Mark A Phillips mphillips@beneschlaw.com, docket@beneschlaw.com;lbehra@beneschlaw.com;cgreen@beneschlaw.com
- Mark A Phillips mphillips@beneschlaw.com, docket@beneschlaw.com;lbehra@beneschlaw.com;cgreen@beneschlaw.com
- Larry G. Poulos larry\_poulos@yahoo.com
- Kenneth G. Prabucki kprabucki@bakerlaw.com
- Kenneth G. Prabucki kprabucki@bakerlaw.com
- Clinton E. Preslan ndohbky@jbandr.com
- Clinton E. Preslan cpreslan@preslanlaw.com
- David F. Proano dproano@bakerlaw.com, fairfinancedocket@bakerlaw.com
- David F. Proano dproano@bakerlaw.com, fairfinancedocket@bakerlaw.com
- Stephen J Pruneski spruneski@rlblp.com
- Timothy J Richards trichards@frantzward.com, dlbeatrice@frantzward.com;timrichardslegal1976@gmail.com
- Mark Riemer mriemer@goldman-rosen.com
- Tim Robinson tim.robinson@dinsmore.com, lisa.geeding@dinsmore.com
- Tim Robinson tim.robinson@dinsmore.com, lisa.geeding@dinsmore.com

- James E. Rossow jim@rubin-levin.net, robin@rubin-levin.net;lisa@rubin-levin.net;atty\_jer@trustesolutions.com
- James E. Rossow jim@rubin-levin.net, robin@rubin-levin.net;lisa@rubin-levin.net;atty\_jer@trustesolutions.com
- Colin P. Sammon colin.sammon@janiklaw.com, Julie.Zakrzewski@Janiklaw.com
- Matthew J. Samsa msamsa@mcdonaldhopkins.com, docket@beneschlaw.com;cgreen@beneschlaw.com
- James Preston Schuck jschuck@bricker.com, cwarner@bricker.com
- Richard V. Singleton rsingleton@blankrome.com, kreda@blankrome.com;jhanner@blankrome.com
- Dale S Smith dsmith@frantzward.com, dlbeatrice@frantzward.com
- Sheldon Stein ssteindocs@gmail.com, kristine@steintrustee.com;sheldon@steintrustee.com
- Rachel L. Steinlage rsteinlage@meyersroman.com, jray@meyersroman.com;mnnowak@meyersroman.com
- Ray H Stoess raystoess@600westmain.com
- Megan D. Stricker mnovinc@davisyoung.com, gcampbell@davisyoung.com
- Timothy M. Sullivan tim@tmslaw.net, crystal@tmslaw.net
- Jonathan D. Sundheimer jsundheimer@btlaw.com
- Gregory D Swope gswope@kwgd.com, mhelmick@kwgd.com
- David J. Theising dtheising@harrisonmoberly.com
- Ronald N. Towne rtowne@neolaw.biz, awehener@neolaw.biz
- Vance P. Truman medinaatty@vancetruman.com
- United States Trustee (Registered address)@usdoj.gov
- Michael S Tucker mtucker@ulmer.com
- Nancy A. Valentine nancy.valentine@icemiller.com, carol.builder@icemiller.com
- Michael A. VanNiel mvanniel@bakerlaw.com
- Thomas C Wagner wagnert@tcwlawyers.com, wagnert@vwlawyers.com
- Daniel Rubin Warren dwarren@bakerlaw.com
- Wayne County Litigants ddrushal@ccj.com
- Nicholas L. White nwhite@bakerlaw.com, fairfinancedocket@bakerlaw.com
- Alicia Raina Whiting-Bozich whiting-bozich@buckleyking.com, heberlein@buckleyking.com
- Douglas Wolfe dwolfe@asmcapital.com
- Lenore Kleinman ust04 Lenore.Kleinman@usdoj.gov
- Maria D. Giannirakis ust06 maria.d.giannirakis@usdoj.gov

## Manual Notice List

The following is the list of **parties** who are **not** on the list to receive e-mail notice/service for this case (who therefore require manual noticing/service).

Emily S. Donahue  
Jackson Walker L.L.P.  
2323 Ross Avenue, Suite 600  
Dallas, TX 75202

Christine A. Arnold  
6005 Twin Lakes Drive  
Parma, OH 44219

Dennis S. Sumerix  
18592 Edwards Road, Lot 171  
Doylestown, OH 44230-9546

Leon Friedberg  
Dennis J. Concilla  
Carl A. Aveni  
H. Ritchey Hollenbaugh  
Carlile Patchen & Murphy LLP  
366 Broad Street  
Columbus, OH 43215

Robert Boote  
Ballard Shahr LLP  
919 North Market Street, 12th Floor  
Wilmington, DE 19801-3034

Leslie C Heilman  
Ballard Spahr LLP  
919 North Market Street, 12th Floor  
Wilmington, DE 19801-3034

Maria D. Giannirakis  
Office of the United States Trustee  
Howard M. Metzenbaum U.S. Courthouse  
201 Superior Avenue East, Suite 441  
Cleveland, OH 44114

Lothar Jung  
12962 W. Linden Avenue  
Parma, OH 44130-5817

John J. Kuster  
Benjamin R. Nagin  
Sidley Austin LLP  
787 Seventh Avenue  
New York, NY 10019

Eric W. Sleeper  
Barton Barton & Plotkin LLP  
420 Lexington Avenue  
New York, NY 10170

Gary Sallee  
11650 Olio Road, Suite 1000-333  
Fishers, IN 46037

Robert Hanlon  
Eileen Hanlon  
P.O. Box 42  
State Route 43  
Mogadore, OH 44260

John McCauley, Esq.  
J. Richard Kiefer, Esq.  
Bingham McHale LLP  
2700 Market Tower  
10 West Market Street  
Indianapolis, IN 46204

Tobey Daluz  
Ballard Spahr LLP  
919 North Market Street, 12th Floor  
Wilmington, DE 19801-3034

Jay Jaffe  
Faegre Baker Daniels LLP  
600 E. 96<sup>th</sup> Street, Suite 600  
Indianapolis, IN 46240

Michael V. Demczyk  
12370 Cleveland Avenue, NW  
P.O. Box 867  
Uniontown, OH 44685

Charles Boerner  
1848 Ritchie Road  
Stow, OH 44224

JM Partners LLC  
Attn: John Marshall  
6800 Paragon Place, Suite 202  
Richmond, VA 23230-1656