

STATE OF MINNESOTA
COUNTY OF HENNEPIN

DISTRICT COURT
FOURTH JUDICIAL DISTRICT

CASE TYPE: MISC

*In Re: Wayzata Home Products, LLC
and cliqstudios.com LLC*

Court File No.: 27-CV-20-4326
Judge David L. Piper

)
)
)
)
) **THE ASSIGNEE'S FIRST AMENDED**
) **NOTICE OF MOTION AND MOTION**
) **TO HEAR OMNIBUS OBJECTIONS**

NOTICE OF MOTION

PLEASE TAKE NOTICE that the Assignee in the above-referenced matter, Lighthouse Management Group, Inc., (“Lighthouse” or “the Assignee”), will bring this Motion to Hear the First, Second and Third Omnibus Claim Objections (“Motion”) before the Honorable David L. Piper at the Hennepin County Court, 300 South Sixth Street, Minneapolis, MN 55415, at 1:30 p.m. on Friday, November 6, 2020. This hearing will be heard remotely, via Zoom. The Assignee will provide log-in details to remotely participate to any party that files an objection or otherwise requests the log-in details from Assignee.

The Assignee requests that any responses or objections to the Omnibus Claim Objections be filed no later than Friday, October 30, 2020, and if no objections are timely filed, the Court may grant the motion without a hearing.

MOTION

Pursuant to Minnesota Statutes § 576.50, Assignee hereby moves this Court for an order granting the First, Second and Third Omnibus Objection to Claims in the above-captioned action. This Motion is supported by the legal analysis and supporting declaration of each omnibus

objection, which will be filed in accordance with the Minnesota Rules of General Practice. The Motion is also based on the files, records, pleadings, and other documents previously submitted by the parties, as well as the arguments of counsel presented in written submissions, or argued at a future motion hearing.

Date: October 5, 2020

BARNES & THORNBURG LLP

By: /s/ Michael A. Cavallaro

Christopher J. Knapp (MN #0344412)

Michael A. Cavallaro (MN #0389995)

225 South Sixth Street, Suite 2800

Minneapolis, MN 55402

Telephone: (612) 333-2111

Facsimile: (612) 333-6798

cknapp@btlaw.com

mcavallaro@btlaw.com

Attorneys for Lighthouse Management Group, Inc.,
as Assignee

**ACKNOWLEDGMENT REQUIRED BY
MINNESOTA STATUTES SECTION 549.211, SUBDIVISION 1**

The undersigned hereby acknowledges that pursuant to Minn. Stat. § 549.211, subd. 2, costs, disbursements, and reasonable attorney and witness fees may be awarded to the opposing party or parties in this litigation if the Court should find that the undersigned acted in bad faith, asserted a claim or defense that is frivolous and that is costly to the other party, asserted an unfounded position solely to delay the ordinary course of the proceedings or to harass; or committed a fraud upon the Court.

Date: October 5, 2020

BARNES & THORNBURG LLP

By: /s/ Michael A. Cavallaro

Christopher J. Knapp (MN #0344412)

Michael A. Cavallaro (MN #0389995)

225 South Sixth Street, Suite 2800

Minneapolis, MN 55402

Telephone: (612) 333-2111

Facsimile: (612) 333-6798

cknapp@btlaw.com

mcavallaro@btlaw.com

Attorneys for Lighthouse Management Group, Inc.,
as Assignee