

CASE TYPE: CIVIL OTHER

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

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

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

**DECLARATION OF PATRICK
FINN IN SUPPORT OF
ASSIGNEE'S CLAIM SCHEDULE**

I, Patrick Finn, hereby declare as follows:

1. I am an adult resident of the State of Minnesota and a Partner of assignee Lighthouse Management Group, Inc. ("**Lighthouse**" or "**Assignee**"). I make this Declaration of my own personal knowledge, unless otherwise noted, and in conjunction with Assignee's Submitted Claims Schedule (the "**Claims Schedule**"). I have personal knowledge of the matters stated herein, unless otherwise indicated.

2. On March 13, 2020, in accordance Minnesota Statutes § 577.12, Wayzata Home Products, LLC, and its subsidiaries, including cliqstudios.com LLC (together with the other subsidiaries, Square Cabinets LLC f/k/a Itasca Cabinets LLC and Wayzata Cabinetry LLC, collectively the "**Assignors**"), as the assignors, and Lighthouse, as the assignee, entered into an Assignment for Benefit of Creditors (the "**Assignment**").

3. As part of its duties, the Assignee proposed procedures for the resolution and treatment of claims against the assignment estate. On June 6, 2020, the Court entered that certain Order Granting Assignee's Motion to Establish a Claims Process (the "**Claims Order**").

4. The Claims Order required the Assignee to prepare an initial schedule of claims that sets forth the known creditors of the Assignor and the amounts owing to such creditors based

upon all information available to Assignee, including, but not limited to, the books and records of the Assignor entities (the “**Preliminary Schedule**”).

5. Once the Preliminary Schedule was prepared, the Assignee then sent those claimants a Notice of Claim, Proof of Claim Form, and Proof of Claim Instructions (collectively, the “**Claim Notice**”).

6. In order to notify claimants as required by the Claims Order, the Assignee provided the Preliminary Schedule to Donlin, Recano & Company, Inc. (“Donlin”), the Assignee’s claims processing vendor. Donlin sent out the Claim Notice on June 29, 2020.

7. Those claimants who received a Claim Notice based on the Preliminary Schedule were not required to file a claim if they did not object to the claim as listed on the Preliminary Schedule.

8. However, if a claimant disputed the claim as set forth on the Preliminary Schedule, or was not included on the Preliminary Schedule, the claimant was required to file a proof of claim on or before July 29, 2020, which was 30 days after the date that the Assignee sent the Claim Notice (the “**Claims Deadline**”).

9. The Claims Order requires the Assignee to file a Claims Schedule of all submitted claims.

10. The Claims Schedule represents all known claims to Assignee as of the date of this declaration, including late filed claims.

11. A true and correct copy of the Claims Schedule is attached hereto as **Exhibit A**. The Claims Schedule includes all claims included on the Preliminary Schedule as well as all claims filed with the Assignee, by 5:00 p.m. CDT on August 29, 2020, which is the date that is 30 days after the Claims Deadline.

12. The amount included in the "Submitted Claim Amount" column in the Claims Schedule reflects the filed proof of claim amount, or in instances where a proof of claim was not filed, it reflects the amount in the Preliminary Schedule.

13. The Claims Schedule includes 1,544 claims totaling \$43,004,853. Of these, 158 claims totaling \$41,350,895 are claims filed with the Assignee and 1,386 claims totaling \$1,653,958 are based on the Preliminary Schedule.

14. The Claims Schedule includes 18 claims totaling \$223,577 that were received after the Claims Deadline.

15. The Assignee is reviewing the claims listed on the Claims Schedule, including the supporting documentation, to determine and verify the amount and validity of the claim as filed. The Assignee reserves all right to accept claims not yet filed with the Assignee, amend or object to amounts of submitted claims, including within the Claims Schedule, in accordance with the Claims Order.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 28th day of August, 2020, at New Brighton, Minnesota.



Patrick Finn