

CASE TYPE: Civil/Miscellaneous

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

STATE OF MINNESOTA

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

Court File No.: 27-CV-20-4326

Judge: David L. Piper

**NOTICE OF MOTION AND MOTION OF LIGHTHOUSE MANAGEMENT GROUP,
INC. FOR APPROVAL OF FINAL REPORT, APPROVAL OF DISTRIBUTION TO
CREDITORS, AND DISCHARGE OF THE RECEIVER**

PLEASE TAKE NOTICE that the Assignee in the above-referenced matter, Lighthouse Management Group, Inc. (“Assignee”), by and through its undersigned counsel, will move the Court on January 20, 2021 at 11:30 a.m, or as soon thereafter as counsel may be heard, before the Honorable David L. Piper, for an Order, pursuant to Minn. Stat. § 576.38, approving Assignee’s final report; approving distribution to creditors; discharging Assignee as receiver and terminating the assignment for the benefit of creditors. 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.

**IF NO OBJECTION IS FILED BY FRIDAY, JANUARY 15, 2021, THE RELIEF
REQUESTED BY THE ASSIGNEE MAY BE APPROVED WITHOUT A HEARING.**

The Assignee has prepared a final accounting and final report (“Final Report”), which accompanies this Motion. The Final Report accurately reflects the income and expenses of the assignment and assets and liabilities held by the Assignee during this assignment. Accordingly, the Assignee is entitled to be discharged under Minn. Stat. § 576.38, and Rule 137.10 of the Minnesota General Rules of Practice.

Grounds for the Assignee's Motion are more fully set forth in the accompanying memorandum of law, the Assignee's Final Report, the arguments of counsel, and all of the files, records and proceedings herein.

Dated: December 23, 2020

BARNES & THORNBURG LLP

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LIGHTHOUSE MANAGEMENT GROUP, INC.

**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.

Dated: December 23, 2020

BARNES & THORNBURG LLP

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