

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 ASSIGNEE TO
ESTABLISH CLAIMS PROCESS**

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 June 25, 2020 at 11:00 a.m., or as soon thereafter as counsel may be heard, before the Honorable David L. Piper, in a Courtroom to be assigned at the Hennepin County Courthouse, 300 South Sixth Street, Minneapolis, MN 55487, for an Order to Establish Claims Process pursuant to Minnesota Statute § 576.49 and Minnesota Rule of General Practice 115.04 (“Motion”).

MOTION

Pursuant to Minnesota Statute § 576.49, Assignee respectfully requests that the Court enter an order establishing the process and procedures by which creditors shall be permitted to file claims, and granting such further relief as may be just and equitable.

This Motion is brought pursuant to Minnesota Statute § 576.49 and Minnesota Rule of General Practice 115.04, and is based on the Declaration and Memorandum submitted in its support, and the entire file and all proceedings of the matter captioned above.

Dated: May 29, 2020.

Respectfully submitted,

BARNES & THORNBURG LLP

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COUNSEL FOR ASSIGNEE
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: May 29, 2020.

BARNES & THORNBURG LLP

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