

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

IN RE:) CASE NO. 18-05837-hb
)
CAFE HOLDINGS CORP., et al.¹) CHAPTER 11
)
Debtors.)
_____)

RULE 2019 VERIFIED STATEMENT OF ATTORNEY FOR CREDITORS

NOW COMES Moore & Van Allen, PLLC, and files this Verified Statement (this “Statement”) pursuant to Bankruptcy Rule 2019 of the Federal Rules of Bankruptcy Procedure.

As required by the rule, Moore & Van Allen PLLC verifies to the Court as follows:

1. Moore & Van Allen, PLLC is a professional limited liability company headquartered in Charlotte, North Carolina, with additional offices located in Research Triangle Park, North Carolina, and Charleston, South Carolina.

2. Moore & Van Allen PLLC represents the following creditors in the above-referenced bankruptcy case of Café Holdings Corp., et al. (“Debtors”):

- (a) Old Mill Stream, LLC
Nature of Claim: Subordinated Unsecured Note and Breach of Leases.
Amount of Claim: Not less than \$1,079,623.91 in lease arrearage.
Circumstances of Employment: Moore & Van Allen PLLC represents Old Mill Stream in the collection of a delinquent note and leasehold indebtedness.
- (b) MRB, LLC
Nature of Claim: Breach of Leases
Amount of Claim: Not less than \$311,626.25 in lease arrearage.
Circumstances of Employment: MVA, along with Buist, Byers and Taylor, LLC represents MRB, LLC in the collection of the client’s delinquent leases to Debtors.

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: Cafe Holdings Corp. (7910); Cafe Enterprises, Inc. (4946); CE Sportz LLC (2009); and CES Gastonia LLC (0863).

- (c) M&R Investors, LLC
Nature of Claim: Breach of Lease
Amount of Claim: Not less than \$281,896.58 in lease arrearage
Circumstances of Employment: MVA, along with Buist, Byers and Taylor, LLC represents M&R Investors, LLC in the collection of the client's delinquent leases to Debtors.

3. Moore & Van Allen, PLLC has been engaged through its various individual counsel by each of the foregoing claimants and parties in interest in connection with the administration and enforcement of their respective claims against the Debtors. Disclosure to the clients of the concurrent representation has been made and authorization for the concurrent representation has been obtained.

4. Moore & Van Allen, PLLC has considered and evaluated all potential conflicts of interest in accordance with the Rules of Professional Conduct. Moore & Van Allen PLLC has determined that the concurrent representations are permissible and has obtained the proper consents from its clients. Moore & Van Allen PLLC agrees to supplement this Statement to the extent required and will seek additional consents if necessary.

5. Moore & Van Allen PLLC holds no claim against or interest in the Debtor.

6. Moore & Van Allen PLLC reserves the right to amend and supplement this Statement.

MOORE & VAN ALLEN PLLC

/s/ Reid E. Dyer

David B. Wheeler #4061

Reid E. Dyer #10723

Moore & Van Allen PLLC

78 Wentworth Street

Charleston, South Carolina 29401

Phone: 843-579-7015

Fax: 843-579-8727

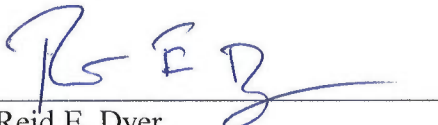
E-mail: davidwheeler@mvalaw.com

ATTORNEYS FOR OLD MILL STREAM, LLC;
MRB, LLC; AND M&R INVESTORS, LLC

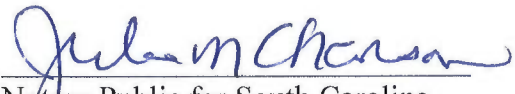
STATE OF SOUTH CAROLINA)
) VERIFICATION
COUNTY OF CHARLESTON)

The undersigned, being first duly sworn, deposes and says that he has read the foregoing and to her personal knowledge the matters and statements contained therein are true, except as to those matters or statements made upon information and belief, and as to those he believes them to be true.

This the 10th day of December, 2018.


Reid E. Dyer

Sworn to and subscribed before me
this 10th day of December, 2018.


Notary Public for South Carolina
My commission expires: 11-3-2027