

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, as a group, Old Mill Stream, MRB, LLC and M&R Investors, LLC in the collection of Debtors’ 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: Moore & Van Allen PLLC represents, as a group, Old Mill Stream, MRB, LLC and M&R Investors, LLC in the collection of Debtors’ leasehold indebtedness.

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: Moore & Van Allen PLLC represents, as a group, Old Mill Stream, MRB, LLC and M&R Investors, LLC in the collection of Debtors' leasehold indebtedness.

- (d) Public Service of North Carolina ("PSNC")
Nature of Claim: 503(b)(9) and Unsecured Claim
Amount of Claim: Not less than \$3,903.81 [503(b)(9)]
Circumstances of Employment: MVA regularly represents PSNC in bankruptcy matters and is assisting the client with the recognition of its administrative claim.

- (e) South Carolina Electric & Gas Company ("SCE&G")
Nature of Claim: 503(b)(9) Claim and Unsecured Claim
Amount of Claim: Not less than \$7,717.67 [503(b)(9)]
Circumstances of Employment: MVA regularly represents SCE&G in bankruptcy matters and is assisting the client with the recognition of its administrative claim.

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.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 19th day of March, 2019, copies of the **RULE 2019 VERIFIED STATEMENT OF ATTORNEY FOR CREDITORS** were served by (i) electronic notification on those parties registered with the United States Bankruptcy Court, South Carolina ECF system to receive notices for this case.

/s/Julie M. Chanson
Julie M. Chanson, Paralegal
Moore & Van Allen PLLC
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Charleston, SC 29413-2828
(843)579-7000

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).