

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

IN RE:	§	
	§	
DEEPROOT CAPITAL MANAGEMENT, LLC, ET AL.,	§	BANKRUPTCY NO. 21-51523
	§	
DEBTORS.	§	JOINTLY ADMINISTERED

**OBJECTORS’/CREDITORS’ WITNESS AND EXHIBIT LIST FOR  
APRIL 11, 2022 HEARING ON: TRUSTEE’S MOTION TO APPROVE SALE  
OF LIFE INSURANCE POLICIES  
[RELATING TO ECF NO. 78, ECF NO. 83, AND ECF NO. 94]**

The Objectors/Creditors file this Witness and Exhibit List for the April 11, 2022 Hearing scheduled relating to the matters listed below.

**MATTERS TO BE HEARD:**

*Trustee’s Motion to Approve (A) Sale of Life Insurance Policies, (B) Sale Procedures, Stalking Horse Agreement and Bid Protections in Connection with the Sale Property of the Estate of Policy Services, Inc and (C) the Form of Notice for the Sale of Property of the Estate of Policy Services, Inc (the “Sale Motion”); and Objections to Sale of the Property of the Estate of Policy Services, Inc.*

**OBJECTORS’/CREDITORS’ WITNESSES:**

The Objectors/Creditors designate the following witnesses:

1. John Patrick Lowe, Chapter 7 Trustee of the jointly administered bankruptcy estates;
2. Chris Turner, TuYo Holdings, LLC;
3. Robert Mueller, Debtor Representative of all Debtor entities;
4. Jack Daniel, Creditor of the 575 Fund (via WebEx);
5. Pauline Rubin, Creditor of the 575 Fund and the dGRD Fund (via WebEx);
6. Paula Burke, Creditor of the dGRD Fund;
7. Randall Pulman, Pulman, Cappuccio & Pullen, LLP;
8. Gregory Yost, TuYo Holdings, LLC;
9. Any witness called or designated by any other party;
10. Any rebuttal or impeachment witnesses, as necessary; and

11. Any person present at the Hearing (live or via WebEx).

The Objectors/Creditors reserve the right to amend or supplement this list at any time prior to the hearing.

**OBJECTORS'/CREDITORS' EXHIBITS**

<b>Ex. #</b>	<b>Description</b>	<b>Offered</b>	<b>Objection</b>	<b>Admitted/ Not Admitted</b>	<b>Disposition</b>
1	SEC Complaint				
2	Mueller's Answer to SEC Complaint				
3	2015 & 2019 575 Application and Subscription Agreement				
4	2015 & 2019 dGRD Application and Subscription Agreement				
5	2015 & 2019 575 Fund PPMs				
6	2015 & 2019 dGRD Fund PPMs				
7	Policy Services Claims Register				
8	575 Fund Claims Register				
9	dGRD Fund Claims Register				
10	Policy Services, Inc. Schedules				
11	575 Fund Schedules				
12	dGRD Fund Schedules				
13	2022.03.16 – Doc 80 – Entry of Appearance for Notification				
14	2022.02.22 – Certificate of Formation – TuYo HOLDINGS, LLC				
15	COA for Turner Logic, LLC and deeproot Pinball thread				
16	Turner Logic, LLC Website				
17	Franchise Tax Status for TuYo HOLDINGS, LLC				
18	Daniel – 575 Fund Proof of Claim and Attachments				
19	Rubin – 575 Fund Proof of Claim and Attachments				

20	Rubin – 575 Fund 1099-DIV Forms				
21	Rubin – dGRD Fund Proof of Claim and Attachments				
22	Burke – dGRD Fund Proof of Claim and Attachment				
	Any exhibits designated by any other party				
	Any rebuttal or impeachment exhibits				

Objectors/Creditors reserve the right to amend or supplement this list at any time prior to the hearing.

Respectfully submitted,

THE JUREK LAW GROUP, PLLC.

By: /s/Lynne M. Jurek

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**ATTORNEY FOR OBJECTORS**

**Certificate of Service**

I hereby certify that on the 6<sup>th</sup> day of April, 2022, I electronically filed a true and correct copy of the above foregoing Objectors’/Creditors’ Witness and Exhibit List for April 11, 2022 Hearing on: Trustee’s Motion to Approve Sale of Life Insurance Policies [Relating to ECF No. 78, ECF No. 83, and ECF No. 94] using the CM/ECF system, which will serve the document to the parties that are registered or otherwise entitled to receive electronic notices listed below in this case pursuant to the Electronic Filing Procedures in this District.

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