

**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

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

John Patrick Lowe, Chapter 7 Trustee (“Trustee”), files this Witness and Exhibit List for the April 11, 2022 Hearing scheduled relating to the matter 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 of 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”)*¹. Note that at the initial hearing on the Sale Motion, held on March 18, 2022, the Court approved the Sale/Bid Procedures [See Order at ECF No. 83]

TRUSTEE’S WITNESSES:

Trustee designates the following witnesses:

1. J. Patrick “Pat” Lowe, Chapter 7 Trustee of the jointly administered bankruptcy estates;
2. W. Drew Mallender, Pulman, Cappuccio & Pullen, LLP;
3. Chris Turner, TuYo Holdings, LLC;
4. Gregory Yost, TuYo Holdings, LLC;
5. Any witness called or designated by any other party;
6. Any rebuttal or impeachment witnesses, as necessary; and
7. Any person present at the Hearing (live or via WebEx)

Trustee reserves the right to amend or supplement this list at any time prior to the hearing.

¹ Capitalized terms unless otherwise defined herein shall have the same meaning as ascribed to them in the Sale Motion

TRUSTEE'S EXHIBITS

Ex. #	Description	Offered	Objection	Admitted/ Not Admitted	Disposition
1	List of In-Force Life Insurance Policies				
2	List of Lapsed Life Insurance Policies				
3	Executed Purchase and Sale Agreement between Trustee and Stalking Horse Bidder				
4	Proposed Sale of Assets Order – revisions redlined from original proposed order filed with Motion				
5	Notice of No Competing Bids [ECF No. 95]				
6	Certificate of Service of Sale Notice and Sale Procedures [ECF No. 88]				
7	Policy Package 9575 [Protective Life Insurance Company – West Coast Life] A – Ownership & Beneficiary Info B- Declarations Page C- Purchase Agreement (with Policy Services, Inc as Purchaser)				
8	Policy Package 548 [John Hancock Life Insurance Company] A – Ownership & Beneficiary Info B- Declarations Page C- Purchase Agreement (with Policy Services, Inc as Purchaser)				
9	Policy Package 287 [John Hancock Life Insurance Company] A – Ownership & Beneficiary Info B- Declarations Page C- Purchase Agreement (with Policy Services, Inc as Purchaser)				
10	Policy Package 319 [MetLife Investors USA Insurance Company] A – Ownership & Beneficiary Info B- Declarations Page C- Purchase Agreement (with Policy Services, Inc as Purchaser)				
11	Policy Package 157 [MetLife Investors USA Insurance Company] A – Ownership & Beneficiary Info B- Declarations Page C- Purchase Agreement (with Policy Services, Inc as Purchaser)				

12	Policy Package 7116 [Protective Life Insurance Company] A - Ownership & Beneficiary Info B - Declarations Page C - Purchase Agreement (with Policy Services, Inc as Purchaser)				
13	Policy Package 6790 [Occidental Life Insurance Company of NC] A - Ownership & Beneficiary Info B - Declarations Page C - Purchase Agreement (with Policy Services, Inc as Purchaser)				
14	Ridley Policy Package 9371 [Protective Life Insurance Company] A - Ownership & Beneficiary Info B - Declarations Page C - Purchase Agreement (with Policy Services, Inc as Purchaser)				
	Any exhibits designated by any other party				
	Any rebuttal or impeachment exhibits				

Trustee reserve the right to amend or supplement this list at any time prior to the hearing.

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Respectfully submitted,

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**ATTORNEYS FOR JOHN PATRICK LOWE,
CHAPTER 7 TRUSTEE FOR THE JOINTLY
ADMINISTERED CASE OF IN RE DEEPROOT
CAPITAL MANAGEMENT, LLC ET AL.**

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of April, 2022, I electronically filed the foregoing document using the CM/ECF system, which will serve the document to the following parties requesting notice; a copy of the exhibits will be sent via email to these same parties.

Via Counsel CM/ECF:

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jason.rudd@wickphillips.com

Policy Services, Inc

deeproot Pinball, LLC

deeproot Growth Runs Deep Fund, LLC

deeproot 575 Fund, LLC

deeproot 3 Year Bonus Income Fund, LLC

deeproot BonusGrowth 5 Year Debenture Fund, LLC

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deeproot Funds, LLC

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