

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MISSOURI

In re:)
)
Christopher Joseph Moreno) Case No. 16-42398
Cortney Camille Moreno) Chapter 7
Debtors,) Judge Dennis R. Dow

NOTICE OF 2004 EXAMINATION

TO: CHRISTOPHER JOSEPH MORENO

Please take notice that pursuant to Fed. R. Bankr. P. 2004 and Local Rule 2004-1.A, Heidi V. Anderson, attorney for SRS Distribution, Inc., a/k/a DJ Roofing Supply, will conduct an examination of Christopher J. Moreno, commencing at 10:00 a.m. on the 1st day of December, 2016, and continuing from that time until complete, at the offices of Molle Law Firm, 10777 Barkley, Suite 130, Overland Park, Kansas.

Pursuant to Local Rule 2004-1 and Fed. R. Civ. P. 30(b)(2), Debtor is hereby requested at the same date, place and time to produce for inspection and copying the documents identified in the attached Exhibit A. The 2004 Examination may be recorded electronically or by stenography or other recording method.

MOLLE LAW FIRM, LLC

/s/Heidi V. Anderson
Heidi V. Anderson, MO #60406
10777 Barkley, Suite 130
Overland Park, KS 66211
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ATTORNEY FOR CREDITOR
SRS DISTRIBUTION, INC.
a/k/a DJ ROOFING SUPPLY

EXHIBIT A - DOCUMENT REQUESTS

1. Copies of either and/or both Debtors' Federal and State Income Tax Returns, including but not limited to, W-2 Forms, Form 1099 and any and all other evidence of income during the past three (3) tax years, as well as evidence of income for this tax year to date;
2. Any and all pay check stubs or other documents evidencing employment or any debts owed to Debtors' by any third party during the past three (3) years;
3. Any checkbooks, bank statements, savings account passbooks, statements, deposit or withdrawal slips, or any other documents reflecting monies of either or both Debtors or any business in which either Debtor has/had an ownership, legal or beneficial interest in, in any financial institution, including retirement funds, currently or within the last three (3) years;
4. A copy of the title and registration for any automobiles or other motor vehicles which either or both Debtors use or which are listed in either or both Debtors' name(s);
5. Copies of deeds to real estate in which either or both Debtors claim or can claim a legal or beneficial interest, or are named as grantees thereto;
6. Copies of deeds of trust, trust documents or arrangements, life insurance policies, and annuity policies to which either or both Debtors claim a legal or beneficial interest, or in which either Debtor is a named beneficiary;
7. Any and all stock certificates evidencing ownership in any corporation of which either Debtor claims a legal or beneficial ownership, or in which either Debtor is a named owner thereto;
8. Copies of documents which evidence either Debtor's legal or beneficial interest in any limited liability company, general or limited partnership, sole proprietorship, or non-profit corporation;
9. Copies of any employment contract to which either Debtor is a party;
10. Copies of any documents which evidence ownership or a legal or beneficial interest in options to purchase stock, commodities, real estate or commercial deposits, or any item of value;
11. Copies of appraisals of any personal property which either or both Debtors own, valued in excess of \$2500.00;
12. Any and all financial statements prepared for or by either Debtor or for any business in which either Debtor has/had an ownership, legal or beneficial interest in, within the last three (3) years;
13. Any and all documents which evidence any loans made by either Debtor, or any business in which either Debtor has/had an ownership, legal or beneficial interest in, within the past three (3) years, and any and all documents which evidence any repayment of such loan(s);

14. Any and all documents which evidence any loans made to either Debtor, or any business in which either Debtor has/had an ownership, legal or beneficial interest in, within the past three (3) years, and any and all documents which evidence any repayment of such loan(s);

15. Any and all documents evidencing any and all compensation agreements between either Debtor or any business in which either Debtor has/had an ownership, legal or beneficial interest in within the past three (3) years, and any employee or person receiving compensation, including Debtor;

16. Business records for Bull Contracting, LLC or "Bull Roofing" including, but not limited to, each and every financial statement, profit and loss statement, balance sheets, bank statement, receipts, disbursements, monthly credit card statements, loan applications, personnel records;

17. Business records for Exterior Professionals, LLC including, but not limited to, each and every financial statement, profit and loss statement, balance sheets, bank statement, receipts, disbursements, monthly credit card statements, loan applications, personnel records;

18. Business records for Blue Key Strategies, LLC including, but not limited to, each and every financial statement, profit and loss statement, balance sheets, bank statement, receipts, disbursements, monthly credit card statements, loan applications, personnel records;

19. Business records for any business affiliated with "Elect Chris Moreno" including, but not limited to, each and every financial statement, profit and loss statement, balance sheets, bank statement, receipts, disbursements, monthly credit card statements, loan applications, personnel records;

20. Business records for Safety First Mobile, LLC including, but not limited to, each and every financial statement, profit and loss statement, balance sheets, bank statement, receipts, disbursements, monthly credit card statements, loan applications, personnel records

21. Any and all other documents evidencing the existence of any assets to which either or both Debtors or any business in which either Debtor has/had an ownership, legal or beneficial interest in within the past three (3) years, claim or can claim a legal or beneficial interest in or to.

CM/ECF NOTICE OF ELECTRONIC FILING

I hereby certify that on November 22, 2016 a true and correct copy of the foregoing Notice of 2004 Examination and Exhibit A thereto was filed electronically and notice was sent via the court's CM/ECF to those parties receiving electronic notice to the addresses listed below:

Jennifer L. Dodson
Law Office of Jennifer Dodson
jdodson@jdodsonlaw.com
ATTORNEY FOR DEBTORS

Janice E. Stanton
Janice.stanton@sbcglobal.net
TRUSTEE

Michael P. Gaughan
Mike.gaughan@southlaw.com
ATTORNEY FOR CREDITOR
BLUE RIDGE BANK & TRUST CO.

I further certify that on November 22, 2016, a true and correct copy of the foregoing Notice of 2004 Examination and Exhibit A thereto was forwarded via U.S. Mail, first class, postage prepaid and properly addressed to the following at the addresses listed below:

Christopher Joseph Moreno &
Cortney Camille Moreno
503 NE Country Lane
Lee's Summit, Missouri 64086
DEBTORS

/s/ Heidi V. Anderson