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5 *Attorneys for Trustee*

6 **IN THE UNITED STATES BANKRUPTCY COURT**  
7 **FOR THE DISTRICT OF ARIZONA**

8 In re:

9 YOMTOV SCOTT MENAGED,

10 Debtor.

In Proceedings Under Chapter 7

Case No. 2:16-bk-04268-PS

11 **TRUSTEE'S MOTION FOR ORDER**  
12 **DIRECTING BANKRUPTCY RULE**  
13 **2004 PRODUCTION OF DOCUMENTS**  
14 **AND EXAMINATION OF**  
15 **FRANCINE LIPARI-MENAGED**

16 Chapter 7 Trustee Jill Ford moves for entry of an order requiring Francine Lipari-  
17 Menaged to produce documents and attend an examination. This Motion is supported by the  
18 following Memorandum Of Points And Authorities.

19 DATED this 12th day of January, 2017.

20 STEVE BROWN & ASSOCIATES, LLC

21 By /s/ Steven D. Nemecek

22 Steven J. Brown  
23 Steven D. Nemecek  
24 1414 East Indian School Road, Suite 200  
25 Phoenix, Arizona 85014  
26 Attorneys for Trustee

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 1. Pursuant to Bankruptcy Rule 2004, upon motion of any party in interest, the  
3 Court may order any person to produce documents relating to the acts, conduct, property,  
4 liabilities, and financial condition of Debtor or to any matter which may affect the  
5 administration of the Estate.

6 2. The Trustee requests an order requiring Francis Lipari-Menaged to produce  
7 documents for the purposes allowed under Bankruptcy Rule 2004.

8 3. The Trustee further requests an order requiring Ms. Lipari-Menaged to appear  
9 and give testimony.

10 4. Ms. Lipari-Menaged is the Debtor's non-filing spouse. The Trustee is  
11 investigating numerous potential assets including real property, business entities, and vehicles.  
12 The issues require further investigation including the production of documents and an  
13 examination.

14 WHEREFORE, the Trustee asks that the Court enter an order requiring Ms. Lipari-  
15 Menaged to produce the documents listed on the order at the offices of Steve Brown &  
16 Associates, LLC, 1414 East Indian School Road, Suite 200, Phoenix, Arizona 85014, on a  
17 date and time agreeable to the parties or, if upon notice, after not less than 21 days' written  
18 notice, and, for Ms. Lipari-Menaged to testify on a date and time agreeable to the parties or, if  
19 upon notice, after not less than 21 days' written notice and for successive days until  
20 completed.

21 DATED this 12th day of January, 2017.

22 STEVE BROWN & ASSOCIATES, LLC

23 By /s/ Steven D. Nemecek

24 Steven J. Brown

25 Steven D. Nemecek

1414 East Indian School Road, Suite 200

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26 Attorneys for Trustee

1 Copy of the foregoing electronically filed  
2 and served via email\* and/or mail\*\* this 12th  
3 day of January, 2017, to:

4 Francine Lipari-Menaged\*\*  
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By: /s/ Karen Flaaen