EXHIBIT L

LEXSEE 1990 BANKR LEXIS 1118

IN THE MATTER OF FEDERATED DEPARTMENT STORES, INC., and ALLIED STORES CORPORATIONS, ET AL. Debtors

Consolidated Case No. 1-90-00130 Chapter 11, Document No. 2A-1

UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF OHIO, WESTERN DIVISION

1990 Bankr. LEXIS 1118

May 30, 1990, Filed

OPINION: [*1]

MOTION OF CREDITORS ANN ZALIK AND STANLEY ZALIK FOR RELIEF FROM THE AUTOMATIC STAY

Ann Zalik and Stanley Zalik (hereinafter referred to as "the Zaliks"), creditors herein, by counsel, hereby move the Court for an order granting relief from the automatic stay herein, to permit the Zaliks to proceed with their state court action against Debtor Federated Department Stores, Inc. d/b/a Lazarus, pending in the Marion County, Indiana, Superior Court under Case No. 49D05-8809-CP-1229. In particular, the Zaliks request that the Court modify the automatic stay for the limited purpose of allowing the Zaliks to establish the amount of their claim against the Debtor in the state court proceeding, and to seek recovery from the Debtors' liability insurers of any judgment entered in favor of the Zaliks in the state court proceeding. The facts relevant to this Motion, and the authorities supporting such Motion, are set forth more fully in the Memorandum submitted herewith.

ATTACHMENT

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

IN THE MATTER OF FEDERATED DEPARTMENT STORES, INC., and ALLIED STORES CORPORATIONS, ET AL. Debtors.

CONSOLIDATED CASE NO. 1-90-00130 Chapter **[*2]** 11 - Judge Aug

MEMORANDUM IN SUPPORT OF MOTION OF CREDITORS ANN ZALIK AND STANLEY ZALIK FOR RELIEF FROM THE AUTOMATIC STAY

Ann Zalik and Stanley Zalik (hereinafter referred to as the "Zaliks"), creditors herein, hereby submit this Memorandum in Support of the Motion of Creditors Ann Zalik and Stanley Zalik for Relief From the Automatic Stay, which is filed herewith.

Facts

On or about September 7, 1986, Ann Zalik visited a Lazarus department store, located in Indianapolis, Indiana, operated by the Debtor, Federated Department Stores, Inc. (hereinafter referred to as "the Debtor"). While at the Lazarus store, Ann Zalik attempted to purchase an item of clothing, and was falsely and maliciously accused by Jeffrey Bray, an employee of the Debtor, of changing the price tag to reflect a lower price. After accusing Ann Zalik, in the presence of other customers of Lazarus, of changing price tags, Jeffrey Bray forcibly and unlawfully took Ann Zalik into custody and detained and deprived her of her freedom, against her will and consent.

Thereafter, the Debtor and its employee, Jeffrey Bray, caused criminal charges to be filed against Ann Zalik, publishing false, malicious, and defamatory **[*3]** statements to the effect that Ann Zalik was a thief.

On September 6, 1988, the Zaliks filed a Complaint for Damages against the Debtor and Jeffrey Bray in the Marion County Superior Court, in an action captioned Ann Zalik and Stanley Zalik, Plaintiffs v. Federated Department Stores Incorporated, d/b/a Lazarus, and Jeffrey M. Bray, Defendants, under case number

49D058809-CP-1229. A copy of the Zaliks' Complaint for Damages is attached as Exhibit "A" to this Memorandum. As set forth more fully in the attached Complaint, Ann Zalik has stated claims against the Debtor and its employee, Jeffrey M. Bray, for libel, slander, false imprisonment, intentional infliction of emotional distress, breach of contract to provide goods for sale in a business-like manner, and negligence on the part of the Debtor in hiring, training and retaining Jeffrey M. Bray in its employ. Also, as set forth more fully in the Complaint, Stanley Zalik has stated a claim for loss of consortium against the Debtor and against Jeffrey M. Bray.

At the time of the incident giving rise to the Zaliks' Complaint, the Debtor had in force policies of liability insurance under which policies the Debtor's insurers may be bound **[*4]** to pay any claims established by the Zaliks against the Debtor.

The Debtor filed its voluntary petition for relief under Chapter 11 of the Bankruptcy Code on or about January 15, 1990. On or about January 26, 1990, counsel for the Debtor filed a Notification of Bankruptcy Stay in the Zaliks' state court action against the Debtor.

DISCUSSION

By their motion for relief from the automatic stay, the Zaliks request that the Court modify the automatic stay in this proceeding for the limited purpose of allowing the Zaliks to establish the amount of their claim against the Debtor in the pending state court proceeding, and to seek recovery from the Debtor's liability insurers of any judgment entered in the state court proceeding in favor of the Zaliks. This Motion is generally based on *11 U.S.C. § 362*(d), which provide that the Court shall grant relief from the automatic stay, on request of a party in interest, "for cause."

Faced with facts similar to those presented here, the courts have held that, in determining whether or not the automatic stay should be modified "for cause" to allow continuation of a state court action, the court should apply a "balancing test, whereby the interests **[*5]** of the estate are weighed against the hardships that will be incurred by the creditor-plaintiff." *In re Bock Laundry Machine Co., 37 B.R. 564, 566 (Bankr. N.D. Ohio 1984);* see *In re Rounseville, 20 B.R. 892 (Bankr. R.I. 1982).* In applying this balancing test, the courts have consistently attached great weight to the hardship suffered by a plaintiff in being denied the opportunity to conduct discovery and litigate the issues of liability through an extended period while the automatic stay remains in force. E.g., *In re Bock Laundry Machine Co., supra.* The courts have also attached great importance to the judicial economy to be gained by allowing the extent of the Debtor's liability to be litigated before the state court, which is best equipped to resolve such issues, especially where the pending state court action does not constitute a core proceeding under *28 U.S.C. § 157,* and where the state court action includes defendants over whom the Bankruptcy Court lacks jurisdiction. Id.; See *In re Turner, 55 B.R. 498 (Bankr. N.D. Ohio 1985).*

In the great majority of cases, these considerations have been found to outweigh the minimal burden to be borne by the Debtor **[*6]** in continuing with the pending litigation, especially where the costs of defense are borne by the Debtor's liability insurers, and where the plaintiff will enforce any judgment obtained only to the extent of the Debtor's liability insurance, and will not seek to satisfy any judgment from property of the estate. Indeed, the only analogous case found by counsel for the Zaliks in which the Court denied relief from stay is *In re Johns-Manville Corp., 40 B.R. 219 (S.D.N.Y. 1983).* In that case, relief from stay was sought not by a creditor-plaintiff, but by a co-defendant with the Debtor in a pending state court action. The Bankruptcy Court had denied relief from stay, and the District Court affirmed, on the grounds that the extensive discovery and trial proceedings involved in the pending litigation would have a "serious adverse impact upon the Debtor's reorganization." *40 B.R. 219, 223.*

Under the facts of this case, good cause clearly exists for this Court to grant the Zaliks relief from the automatic stay, for the purposes of continuing to pursue their state court action against the Debtor. The burden imposed on the Debtor in defending such action will be minimal, in that the costs **[*7]** of litigation and the risk of paying any judgment recovered by the Zaliks will apparently be borne by the Debtor's liability insurers, and not by the Debtor. On the other hand, if the Zaliks are not granted relief from the automatic stay, they will be seriously prejudiced by being required to hold their action against the Debtor in abeyance, possibly for years, during which time witnesses may be lost, and the memories of other witnesses will dim. Moreover, the Zaliks will be unjustifiably delayed in receiving compensation for their injuries, not for the benefit of the Debtor, but only for the benefit of the Debtor's liability insurers. Further, if the Zaliks are not allowed to litigate their tort claims in the state court, they will be required to litigate such claims in the Bankruptcy Court, which has no jurisdiction over the Debtor's co-defendant, Jeffrey Bray, and which lacks jurisdiction to enter a final judgment on the Zaliks' claim.

In balancing these factors, the Court should conclude that good cause exists for granting the Zaliks relief from the automatic stay, to enable the Zaliks to go forward with their pending state court action against the Debtor and its employee, for **[*8]** the limited purpose of establishing the amount of the Zaliks' claim, and of allowing the Zaliks to obtain payment of such claim from the Debtor's liability insurers.

CONCLUSION

For the foregoing reasons, the Zaliks respectfully request that the Court, after all due notice and opportunity for hearing, issue an order granting the Zaliks relief from the automatic stay provided under *11 U.S.C. § 362,* as prayed in the Zaliks' Motion, and for all other relief just and proper in the premises.

HOPPER & ASSOCIATES

BY: GEORGE W. HOPPER

BY: MARK R. GALLIHER

EXHIBIT

STATE OF INDIANA SS: COUNTY OF MARION ANN ZALIK and STANLEY ZALIK, Plaintiffs, vs. FEDERATED DEPARTMENT STORES, INCORPORATED, D/B/A LAZAURS, and JEFFREY M. BRAY, Defendants.

IN THE MARION COUNTY SUPERIOR COURT CIVIL DIVISION

CAUSE NO. ROOM NO. 491058809CP1229

COMPLAINT FOR DAMAGES

COUNT I

Come now the Plaintiffs, Ann Zalik and Stanley Zalik, by counsel, and for their cause of action against the Defendants, Federated Department Stores, d/b/a Lazarus, and Jeffrey M. Bray, allege and say:

1. Plaintiffs, Ann Zalik and Stanley Zalik, are residents of the County of DuPage, State of Illinois.

2. Defendant, Jeffrey Bray, was at **[*9]** all relevant times mentioned a security guard employed by Federated Department Stores, Incorporated, d/b/a Lazarus.

3. Defendant, Federated Department Stores, Incorporated, d/b/a Lazarus, herein designated corporate defendant, is, and at all times mentioned, a corporation organized and existing under the laws of the State of Delaware, engaged in the business of operating a Department Store in the State of Indiana, with one of its places of business in the City of Indianapolis, County of Marion, State of Indiana, located at 10202 East Washington Street.

4. At all times herein mentioned, Defendant, Federated Department Stores, Incorporated, d/b/a Lazarus, was the owner in possession and control of certain premises situated at 10202 East Washington Street, in Indianapolis, Marion County, Indiana, upon which there was erected a building occupied by Defendant and in which it conducted a store for the sale of merchandise to the public.

5. At all times herein mentioned, Defendant, Jeffrey M. Bray, a security guard in the store of Defendant, Federated Department

EXHIBIT "A"

Stores, Incorporated, d/b/a Lazarus, was acting in that capacity for and in behalf of Defendant, Federated Department **[*10]** Stores, Incorporated, d/b/a Lazarus, and within the scope and authority of his employment.

6. On or about September 7, 1986, at approximately 4:00 P.M., Plaintiff, Ann Zalik, visited the aforementioned store of Defendant, Federated Department Stores, Incorporated, d/b/a Lazarus, pursuant to its invitation and as a customer. Plaintiff, Ann Zalik, attempted to purchase an item of clothing and was accused of changing the price tag to reflect a lower price, when Plaintiff, Ann Zalik, had not changed any price tags or had done nothing illegal or improper.

7. Thereupon, while Plaintiff, Ann Zalik, was still within the premises of Defendant, Federated Department Stores, Incorporated, d/b/a Lazarus, and in the presence of other customers in the store, Defendant, Jeffrey M. Bray, imputed unto Plaintiff, Ann Zalik, that she had changed price tags on an article from the store. He then forcibly, unlawfully, and against her will and consent, took her into custody and detained her and deprived her of her right of freedom.

8. In falsely and wrongfully arresting and imprisoning Plaintiff, Ann Zalik, as hereinabove alleged, Defendant, Jeffrey M. Bray, acted willfully, maliciously, without just or **[*11]** probable cause, and in wanton disregard of Plaintiff's, Ann Zaliks, rights.

9. By reason of the acts and conduct of Defendant, Jeffrey M. Bray, as hereinabove alleged, all of which were with the knowledge, consent and approval of Defendant, Federated Department Stores, Incorporated, d/b/a Lazarus, Plaintiff, Ann Zalik, was caused to and did suffer great humiliation and embarrassment, and she was thereby damaged in her reputation, she suffered great shock to her nerves and nervous system, was made to and did become physically ill and sick, and she has been thereby damaged.

10. At that time and place, the Defendant, Jeffrey M. Bray, acting as agent and in behalf of Defendant, Federated Department Stores, Incorporated, d/b/a Lazarus, within the scope of his employment, in the presence of several other persons, seized Plaintiff, Ann Zalik, and maliciously spoke of and concerning the Plaintiff, Ann Zalik, false and defamatory words accusing her of theft, and later caused charges to be filed against her, publishing the same defamatory words.

11. The injuries sustained by Plaintiff, Ann Zalik, resulted from the following, including but not limited to:

(a) the negligence of the Defendant, **[*12]** Federated Department Stores, Incorporated, d/b/a Lazarus, in hiring, training and retaining in their employ, Defendant, Jeffrey M. Bray;

(b) false arrest and imprisonment of the Plaintiff, Ann Zalik:

(c) slander and libel of the Plaintiff, Ann Zalik;

(d) the malicious prosecution of the Plaintiff, Ann Zalik, and resulting libel and slander;

(e) breach of contract to the Plaintiff, Ann Zalik, to provide goods for sale in a businesslike manner.

12. The negligence of the Defendant, Federated Department Stores, Incorporated, d/b/a Lazarus, included but was not limited to the hiring, training and retaining of Jeffrey M. Bray in their employ after they knew or should have known that Jeffrey M. Bray was of an undependable nature, and would be a person likely to falsely arrest, detain, libel and slander others.

WHEREFORE, Plaintiff, Ann Zalik, individually, and by counsel, demands judgment against the Defendants, in a sum just and reasonable in this matter, punitive damages, attorney fees and for all other relief just and proper.

COUNT II

1. Plaintiffs incorporate the allegations of Paragraph 1 through 12, inclusive, of this Complaint as though the same were fully set forth hereinabove. **[*13]**

2. That as a direct result of the conduct: complained hereinabove, Plaintiff, Stanley Zalik, has lost the full enjoyment, services, and consortium of his wife.

WHEREFORE, Plaintiff, Stanley Zalik, demands judgment against the Defendants, and each of them, in a sum just and reasonable in this matter, punitive damages, attorney's fees, and for all other just and proper relief.

T. A. Shula, Attorney for Ann Zalik and Stanley Zalik

JURY DEMAND

Plaintiffs demand Trial by Jury.

T. A. Shula, Attorney for Ann Zalik and Stanley Zalik

T. A. Shula, Counselor at Law Inland Building - Suite 1000 156 East Market Street Indianapolis, Indiana 46204 (317) 639-6920

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LEXSEE 1994 BANKR LEXIS 341

In re: JOSEPH SELIG AND TREMAYNE SELIG, Debtors; CAROL K. LUX, Administrator of the Estate of Persifer B. Kennedy, Jr., Deceased, Plaintiff v. D'ANGELI BUILDING & CONSTRUCTION CO., and LOUIS J. D'ANGELI and JOSEPH SELIG and TREMAYNE SELIG, Defendants

Bankruptcy No. 91-13358DAS Chapter 11, Adversary No. 94-0115DAS

UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

1994 Bankr. LEXIS 341

March 15, 1994, Decided

CASE SUMMARY:

PROCEDURAL POSTURE: Plaintiff estate administrator filed a motion for remand of her action against defendants, a construction company and individuals, to the Court of Common Pleas of Montgomery County, Pennsylvania, from which it had been removed by the debtors. The administrator's action against defendants related to title to real estate.

OVERVIEW: The administrator argued that only a party to an action in nonbankruptcy court could remove that action to a bankruptcy court pursuant to *28 U.S.C.S. § 1452*(a), and that the motion to remove the action to the bankruptcy court filed after the commencement of the bankruptcy case had to be filed within 30 days after service of the initial pleading under Fed. R. Bankr. P. 9027(a)(3). The debtors contended that they sought removal on behalf of defendants. On review, the court granted the motion and remanded the action back to the court of common pleas. The court held that irrespective of on whose behalf the debtors sought removal, it was they and not defendants who were named in the application to remand as the applicants, and they were the parties who invoked *28 U.S.C.S. § 1452*(a), and their status as non-parties to the action was fatal to the application. The court concluded that it was inappropriate to retain jurisdiction over the administrator's proceeding where the relationship of the action to the administration of the underlying case was likely to be very faint.

OUTCOME: The court granted the administrator's motion to remand her action against defendants related to title to real estate, remanded the action back to the court of common pleas, and cancelled the scheduled status conference.

LexisNexis (TM) HEADNOTES - Core Concepts:

Bankruptcy Law > Practice & Proceedings > Adversary ProceedingsCivil Procedure > Removal > Basis for RemovalCivil Procedure > Removal > Removal Proceedings

[HN1] Only a party to an action in nonbankruptcy court may remove that action to a bankruptcy court. *28 U.S.C.S. § 1452*(a). Also, a motion to remove a proceeding to bankruptcy court filed after the commencement of the bankruptcy case to which it is attached must be filed within 30 days after service of the initial pleading or summons in the proceeding upon the movant. Fed. R. Bankr. P. 9027(a)(3).

Bankruptcy Law > Practice & Proceedings > Adversary ProceedingsCivil Procedure > Removal > Removal Proceedings

[HN2] A filing of a Notice of Removal out of time, per Fed. R. Bankr. P. 9027(a)(3), in itself constitutes a strong equitable ground for remand.

Civil Procedure > Removal > Removal ProceedingsCivil Procedure > Removal > Postremoval Remands

[HN3] In deciding a motion to remand a matter previously removed from another forum, all doubts should be resolved in favor of remand.

Bankruptcy Law > Practice & Proceedings > JurisdictionBankruptcy Law > Practice & Proceedings > Adversary Proceedings

[HN4] A reorganization plan proponent may not

effectively confer otherwise-absent jurisdiction upon a bankruptcy court through the medium of a broad retention-of-jurisdiction provision in a plan.

Bankruptcy Law > Practice & Proceedings > Jurisdiction

[HN5] The bankruptcy court's jurisdiction does not follow property, but rather, it lapses when the property leaves the debtor's estate.

COUNSEL: **[*1]** For Plaintiff: Brian M. Fleischer, Esq., Philadelphia, PA.

For Defendants: Leslie Beth Baskin, Esq., Ciardi & DiDonato, P.C., Philadelphia, PA.

JUDGES: SCHOLL

OPINIONBY: DAVID A. SCHOLL

OPINION:

ORDER/MEMORANDUM

BY: DAVID A. SCHOLL, UNITED STATES BANKRUPTCY JUDGE

AND NOW, this 15th day of March, 1994, upon consideration of a Motion ("the Motion") of CAROL R. LUX, Administrator of the Estate of Persifer B. Kennedy, Jr., Deceased ("the Plaintiff"), for Remand of this proceeding to the Court of Common Pleas of Montgomery County, PA. ("the CCP"), from which it had been removed, it is hereby ORDERED as follows:

1. The Motion is GRANTED.

2. The instant proceeding is REMANDED to the CCP, at C.A. No. 93-11602.

3. The status conference scheduled on March 24, 1994, is CANCELLED.

The Motion must be granted for several reasons. As the Plaintiff points out, [HN1] only a party to an action in nonbankruptcy court may remove that action to a bankruptcy court. See *28 U.S.C. § 1452*(a). Also, a motion to remove a proceeding to bankruptcy court filed after the commencement of the bankruptcy case to which it is attached must be filed within thirty (30) days after service of the initial pleading **[*2]** or summons in the proceeding upon the movant. Federal Rule of Bankruptcy Procedure ("F.R.B.P.") 9027(a)(3).

JOSEPH SELIG and TREMAYNE SELIG ("the Debtors"), named as the "Applicants" in the "Application of Removal" n1 ("the Application"), were admittedly served in the CCP action on September 27, 1993; were dropped as parties to that action by the Plaintiffs on November 4, 1993; and did not file the Application until January 18, 1994.

n1 This document should have been designated as a Notice of Removal. See F.R.B.P. 9027. We will, however, refer to this pleading by its misnomer as an "Application."

The Debtors attempt to avoid the effect of the issues noted in the first paragraph supra by contending that the Application was filed on behalf of the remaining Defendants, D'ANGELI BUILDING & CONSTRUCTION CO. and LOUIS J. D'ANGELI (collectively hereafter "D'Angeli"), who remain parties in the CCP action, and were allegedly not served until December 17, 1993.

These contentions are unavailing. Irrespective of on whose **[*3]** behalf the Debtors sought removal, it is they and not D'Angeli who are named in the Application as the Applicants, and hence they are the parties who invoked *28 U.S.C. § 1452*(a). See the Application, initial paragraph and P 10 thereof. The Debtors' status as non-parties to the proceeding is fatal to the Application. Cf. *In re Tilley, 42 Bankr. 827, 829 (Bankr. E.D. Va. 1984)* (construing predecessor to *28 U.S.C. § 1452*(b)). Furthermore, [HN2] a filing of a Notice of Removal out of time, per F.R.B.P. 9027(a)(3), in itself "constitutes a strong 'equitable ground' for remand." *In re Glen Eagle Square, Inc., 1991 WL 111490,* slip op. at *1 (Bankr. E.D. Pa. June 20, 1991).

Even had the foregoing insurmountable procedural deficiencies flawing the Application not been present, a remand would have been in order. It must be recalled that, [HN3] "in deciding a motion to remand a matter previously removed from another forum, all doubts should be resolved in favor of remand. *Boyer v. Snap-on Tools Corp., 913 F.2d 108, 111 (3rd Cir. 1990),* cert. denied, [*480 U.S. 1085]* **[*4]** (1991)." *In re RCS Properties, Inc., 1992 WL 22190,* slip op. at *2 (Bankr. E.D. Pa. Feb. 3, 1992). The fact that the Debtors seek removal on behalf of D'Angelo, rather than on behalf of themselves, is significant. The very absence of the Debtors as parties to the proceeding suggests that subject matter jurisdiction in this court is unlikely to be present, or that the relationship of the proceeding to the administration of the underlying case is likely to be very faint. See *RCS, supra,* slip op. at *1; and *In re Futura Industries, Inc., 69 Bankr. 831, 834-35 (Bankr. E.D. Pa. 1987).*

The Debtors' principal arguments in support of this court's acceptance of jurisdiction over the proceeding are that the subject matter of the lawsuit, i.e., title to the real estate in issue, was addressed in the Debtors' confirmed plan of reorganization, and that the confirmation order expressly assumed jurisdiction of matters necessary to

"implement and effectuate" the plan. However, [HN4] a plan proponent may not effectively confer otherwise-absent jurisdiction upon a bankruptcy court through the medium of a broad retention-of-jurisdiction provision in a plan. See **[*5]** *In re Greenley Energy Holdings of PA., Inc., 110 Bankr. 173, 179-80 (Bankr. E.D. Pa. 1990).* However, the mere fact that the plan addresses the issue of title to property (in which the Debtors no longer have an interest) does not confer subject matter jurisdiction to hear this proceeding on this court. [HN5] "The bankruptcy court's jurisdiction does not follow property, but rather, it lapses when the property leaves the debtor's estate." *In re Hall's Motor Transit Co., 889 F.2d 520, 522 (3rd Cir. 1989).*

This court's "concern about the propriety of exercising its tenuous jurisdiction over" this proceeding, *Glen Eagle Square, supra,* slip op. at *2, especially when added to the procedural deficiencies in the Application itself, convinces us that it would be most inappropriate for us to retain jurisdiction over this proceeding. We will therefore unhesitatingly grant the Motion to remand.

DAVID A. SCHOLL, UNITED STATES BANKRUPTCY JUDGE

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