

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

SHARITY MINISTRIES, INC.,<sup>1</sup>

Debtor.

Chapter 11 (Subchapter V)

Case No.: 21-11001 (\_\_\_)

**NOTICE OF FILING OF CHAPTER 11 (SUBCHAPTER V) PETITION  
AND RELATED MOTIONS AND DECLARATIONS**

**PLEASE TAKE NOTICE** that on July 8, 2021, Sharity Ministries, Inc. (the “Debtor”), filed a voluntary petition for relief under Chapter 11 (Subchapter V) of Title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the “Bankruptcy Code”) in the United States Bankruptcy Court for the District of Delaware (the “Court”).

**A. VOLUNTARY CHAPTER 11 (SUBCHAPTER V) PETITION**

1. Voluntary Petition – Sharity Ministries, Inc., Case No. 21-11001 (\_\_\_) [D.I. 1]

**B. FIRST DAY DECLARATION**

1. Declaration of Neil F. Luria in Support of Chapter 11 Petition and First Day Motions [D.I. 5]

**C. FIRST DAY MOTIONS**

1. Debtor’s Application for Entry of an Order Authorizing the Employment and Retention of BMC Group, Inc. as Claims and Noticing Agent for the Debtor Pursuant to 28 U.S.C. § 156(c), 11 U.S.C. § 105(a) and Local Rule 2002-1(f) *Nunc Pro Tunc* to the Petition Date [D.I. 7]
2. Motion for Entry of Interim and Final Orders Authorizing the Debtor to Continue Paying Share Requests of its Members in Furtherance of its Charitable Mission [D.I. 9]
3. Debtor’s Motion for Entry of an Order (I) Approving the Scope of Notice with Respect to the Debtor’s Members, (II) Approving Opt-In Procedure for Additional Notice, and (III) Granting Related Relief [D.I. 10]
4. Motion for Entry of Interim and Final Orders: (I) Authorizing the Debtor to (A) Continue to Operate its Cash Management System, (B) Maintain its Bank Accounts and Pay Bank

---

<sup>1</sup> The last four digits of the Debtor’s federal tax identification number is 0344. The Debtor’s mailing address is 821 Atlanta Street, Suite 124, Roswell, GA 30075.

and Processor Charges, and (C) Maintain Existing Business Forms; (II) Granting a Limited Waiver of the Requirements of Section 345(b) of the Bankruptcy Code, to the Extent Applicable; and (III) Granting Related Relief [D.I. 11]

5. Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Pay Pre-Petition Employees Wages, Salaries, Benefits, and Reimbursable Expenses, and Other Associated Obligations; and (B) Continue the Post-Petition Maintenance of Employee Benefit Programs, Policies, and Procedures and (II) Granting Related Relief [D.I. 12]

**PLEASE TAKE FURTHER NOTICE** that if you would like to receive copies of any of the documents referenced above prior to the First Day Hearing, copies may be obtained from the of the Debtor's notice and claims agent, BMC Group, Inc. ("BMC") at <https://www.bmcgroup.com/sharity>; or by request by calling BMC at 1-888-909-0100 (toll free) or via electronic mail at [sharity@bmcgroup.com](mailto:sharity@bmcgroup.com) . You may also obtain copies from the website of the United States Bankruptcy Court for the District of Delaware [www.deb.uscourts.gov](http://www.deb.uscourts.gov) for a fee. If you would like to receive copies of these motions by email you may also contact Nicolas E. Jenner, Esq. at [jenner@lrclaw.com](mailto:jenner@lrclaw.com).

Dated: July 9, 2021  
Wilmington, Delaware

**LANDIS RATH & COBB LLP**

*/s/ Nicolas E. Jenner*

Adam G. Landis (No. 3407)  
Matthew B. McGuire (No. 4366)  
Nicolas E. Jenner (No. 6554)  
919 Market Street, Suite 1800  
Wilmington, Delaware 19801  
Telephone: (302) 467-4400  
Facsimile: (302) 467-4450  
Email: [landis@lrclaw.com](mailto:landis@lrclaw.com)  
[m McGuire@lrclaw.com](mailto:m McGuire@lrclaw.com)  
[jenner@lrclaw.com](mailto:jenner@lrclaw.com)

- and -

**BAKER & HOSTETLER LLP**

Jorian L. Rose (*pro hac vice pending*)  
Jason I. Blanchard (*pro hac vice pending*)  
Elyssa S. Kates (*pro hac vice pending*)  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
Email: [jrose@bakerlaw.com](mailto:jrose@bakerlaw.com)  
[jblanchard@bakerlaw.com](mailto:jblanchard@bakerlaw.com)

ekates@bakerlaw.com

Andrew V. Layden (*pro hac vice pending*)  
SunTrust Center, Suite 2300  
200 South Orange Avenue  
Orlando, FL 32801-3432  
Telephone: (407) 649-4000  
Facsimile: (407) 841-0168  
Email: alayden@bakerlaw.com

*Proposed Counsel for the Debtor  
and Debtor-in-Possession*