

UNITED STATES BANKRUPTCY COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

In re  
BRIAN W. COUGHLIN,  
Debtor

IN PROCEEDINGS UNDER  
CHAPTER 13  
CASE NO. 19-14142-FJB

**MOTION OF THE DEBTOR TO ENFORCE THE AUTOMATIC STAY**

The Debtor, Brian W. Coughlin, hereby moves, pursuant to 11 U.S.C. §§ 362(a)(6) and 362(k)(1), for an Order enforcing the automatic stay as against Niiwin, LLC doing business as Lendgreen and its parent entities, LDF Holdings, LLC, Lac du Flambeau Business Development Corporation and the Lac du Flambeau Band of Lake Superior Chippewa Indians (collectively, the “Creditor”), and to the extent the court determines that the Creditor has committed acts that constitute a willful violation of the automatic stay, awarding the Debtor attorneys fees and expenses and an award of punitive damages as the court deems reasonable under the circumstances. As grounds therefor, the Debtor states as follows:

**IDENTIFICATION OF PARTIES  
AND BASIS OF JURISDICTION**

1. The Debtor, Brian W. Coughlin, filed his Voluntary Petition under Chapter 13 of the Bankruptcy Code on December 4, 2019.
2. The creditor, Niiwin, LLC doing business as “Lendgreen” is a creditor of the Debtor and upon information and belief, is a Tribal Enterprise of the Lac Du Flambeau Band of Chippewa Indians, a federally-recognized Indian Tribe with a mailing address of P.O. Box 221 Lac Du Flambeau, Wisconsin 54538.

3. The creditor Niiwin, LLC doing business as “Lendgreen” is, upon information and belief, is a wholly owned subsidiary of LDF Holdings, LLC, which, in turn, is a wholly owned subsidiary of the Lac du Flambeau Business Development Corporation, which, in turn, is a wholly owned and operated economic arm and instrumentality of the Lac du Flambeau Band of Lake Superior Chippewa Indians (“Tribe”), a federally recognized Indian tribe. Lendgreen is organized and in good standing under the Laws of the Tribe. Lendgreen is a duly licensed Financial Services Licensee of the Lac du Flambeau Tribal Financial Services Regulatory Authority, an independent regulatory body of the Tribe. Upon information and belief, the offices of the Tribe that relate to Lendgreen have an address of 597 Peace Pipe Road, 2<sup>nd</sup> Floor, Lac du Flambeau, Wisconsin 54538.
4. The court's jurisdiction is authorized under the provisions of 28 U.S.C. §§ 1334(b) and 157(b)(1), as matters concerning the administration of the bankruptcy estate are specifically designated as "core proceedings", pursuant to 28 U.S.C. § 157(b)(2)(A).

### **STATEMENT OF FACTS**

5. Prior to the Debtor's Chapter 13 bankruptcy filing, the Debtor obtained an unsecured “payday” loan from the Creditor and owed, as of the date of the commencement of this Chapter 13 case \$1,594.91.
6. The Creditor was listed on the Debtor's Schedule of Unsecured Debts (Schedule “E/F”) as Item 4.17 listing the Creditor as Lend Green”, with a mailing address of P.O. Box 221, Lac Due Flambeau, Wisconsin 54538 and listed the last 4 digits of

- the account number relating to said claim of 3572. A true and accurate copy of the relevant portion of the Debtor's Schedule "E/F" is attached hereto as Exhibit "A".
7. As a consequence of the Debtor's scheduling of the Creditor's claim, the Creditor was properly listed on the Debtor's Mailing Matrix with a mailing address of P.O. Box 221, Lac Due Flambeau, Wisconsin 54538. A true and accurate copy of the relevant portion of the Debtor's Mailing Matrix is attached hereto as Exhibit "B".
  8. On December 4, 2019, Debtor's Counsel served a copy of the Debtor's Original Chapter 13 Plan upon the Creditor at its mailing address of P.O. Box 221, Lac Due Flambeau, Wisconsin 54538 and filed a Certificate of Service regarding the Debtor's Original Chapter 13 Plan reflecting the same. A true and accurate copy of Certificate of Service regarding the Debtor's Original Chapter 13 Plan is attached hereto as Exhibit "C".
  9. On February 26, 2020, after incessant and unrelenting telephone calls from the Creditor, the Debtor called the Creditor and spoke with one of its collection specialists, Linda Ehikpehale, and told her that he had filed for bankruptcy protection under Chapter 13 of the Bankruptcy Code in December of 2019 and that they had been previously notified of his bankruptcy filing. Ms. Ehikpehale then immediately sent an email to the Debtor acknowledging their conversation and stated "As earlier discussed, the email address to send the Power Of Attorney documents for your bankruptcy case is [administration@lendgreen.com](mailto:administration@lendgreen.com)." A true and accurate copy of the February 26, 2020 email is attached hereto as Exhibit "D".

10. Notwithstanding their being notified directly by the Debtor of his bankruptcy filing on February 26, 2020 and well as having had all the the Court's bankruptcy notices, and the Debtor's Chapter 13 Plan sent to its mailing address at of P.O. Box 221, Lac Due Flambeau, Wisconsin 54538, on March 17, 2020, the Creditor continued with its collection efforts against the Debtor and sent another email stating as follows:

**150 DAYS OVERDUE AND IT IS BEING REPORTED TO CREDIT REPORTING AGENCIES**  
**CALL 1-877-689-1848 NOW TO MAKE**  
**A PAYMENT.**

RE: Lendgreen account #028083572-00

**Balance Due: \$1,594.91**

Hi Brian,

Your loan is 150 past due. We have reported this issue to credit reporting agencies and your ability to receive a loan in the future may be impacted. [Call us now to set up a payment schedule.](#)

Alternatively, you can authorize a direct payment by sending the following email to [collections@lendgreen.com](mailto:collections@lendgreen.com):

*"I, Brian, authorize Lendgreen to debit the sum of \$ from my account on .*

*To verify my identity, the last 4 digits of my SSN are\_; the last 4 digits of my routing number are \_\_\_\_\_; and the last 4 digits of my account number are\_."*

If you have any questions regarding this email, please do not hesitate to contact us. [Log into your self-service account](#) to review your loan details.

Regards,

Lendgreen Collections Department  
[collections@lendgreen.com](mailto:collections@lendgreen.com)  
[1-877-689-1848](tel:1-877-689-1848)  
[www.lendgreen.com](http://www.lendgreen.com)

A true and accurate copy of the Email sent by the Creditor is attached hereto as Exhibit "E".

11. The Creditor continues to attempt to contact the Debtor directly, leaving voicemails for him, saying that they have a “very important message” and again prompting the Debtor to call the Creditor.
12. Specifically, on March 18, 2020 at 2:06 pm, the Creditor called the Debtor’s telephone number and left a voicemail for him to contact them about a “very important matter”. A true and accurate copy of the voicemail message is attached hereto as Exhibit “F”.
13. The following day, on March 19, 2020 at 1:53 pm, the Creditor again called the Debtor’s telephone number and left another voicemail for him to contact them about a “very important matter”. A true and accurate copy of the voicemail message is attached hereto as Exhibit “G”.

**BASIS FOR RELIEF REQUESTED**

12. The provisions of 11 U.S.C. § 362(a)(6), state, in pertinent part, as follows:

Except as provided in subsection (b) of this section, a petition filed under section 301, 302, or 303 of this title . . . operates as a stay, applicable to all entities, of—

. . .

(6) any act to collect, assess, or recover a claim against the debtor that arose before the commencement of the case under this title; . . .

13. The Creditor’s debt collections activities were overtly coercive in nature and sought to compel the Debtor to make direct payments to the Creditor using allusions of the fact that it had reported the lack of payment on its claim for the past 150 days to the “credit reporting agencies” and immediately demanding payment on its claim, constitute an act to “collect, assess, or recover a claim

against the debtor that arose before the commencement of the case” within the meaning of 11 U.S.C. § 362(a)(6).<sup>1/</sup>

14. With respect to the “willfulness” requirement under 11 U.S.C. § 362(k)(1), a violation of the automatic stay will be deemed to be “willful”, if the creditor knew of the bankruptcy case and acted intentionally in such a way that the stay was violated.<sup>2/</sup>
15. The actions taken by the Creditor in continuing its collections activity even after being notified by the Court, by Debtor’s Counsel through the submission of the Debtor’s Chapter 13 Plan, and by the Debtor directly demonstrate that the Creditor knew or had reason to know that the Debtor was in the midst of a Chapter 13 bankruptcy case at the time its collection activities were carried out.
16. The violation of the provisions of 11 U.S.C. § 362(a)(6) by the Creditor in this case was clearly done “willfully” if not intentionally by the Creditor as the Creditor, not only received notice of the bankruptcy filing by the Debtor from the court, but also explicitly referenced the bankruptcy filing in the email received by the Debtor on February 26, 2020.

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<sup>1/</sup> Parenthetically, it is worth noting in this case is that, under the terms of the Debtor’s Chapter 13 Plan, the Creditor and all other general unsecured creditors like it who file proofs of claim are to be paid 100% in full. Therefore, had the Creditor bothered to file a Proof of Claim in this case by the bar date of February 12, 2020 (which it did not do), it would have been paid in full.

<sup>2/</sup> **In re Cordle**, 187 B.R. 1 (Bankr., N.D. Cal., 1995).

17. As a result of the Creditor's violation of the automatic stay, the Debtor suffered substantial emotion distress in the belief that, notwithstanding their Chapter 13 bankruptcy filing, he might still be hounded by his creditors, even though he is making substantial Chapter 13 Plan payments, at a particularly vulnerable time when the Debtor was suffering from suicidal ideation, depression and anxiety.

WHEREFORE, the Debtors request, pursuant to 11 U.S.C. §§ 362(a)(6) and 362(k)(1), that the Court issue an Order:

1. Finding that the debt collection actions by Niiwin, LLC doing business as Lendgreen and its responsible parent entities, LDF Holdings, LLC, Lac du Flambeau Business Development Corporation and the Lac du Flambeau Band of Lake Superior Chippewa Indians willfully violated the provisions of 11 U.S.C. § 362(a)(6);
2. Awarding the Debtor his actual damages, including damages for the emotional distress caused by the debt collection activities of Niiwin, LLC doing business as Lendgreen and its responsible parent entities, LDF Holdings, LLC, Lac du Flambeau Business Development Corporation and the Lac du Flambeau Band of Lake Superior Chippewa Indians in willful violation of 11 U.S.C. § 362(a)(6);
3. Awarding the Debtor his attorneys' fees and costs in an amount to be determined by the court for the prosecution of this proceeding;
4. Awarding the Debtor punitive damages against Niiwin, LLC doing business as Lendgreen and its responsible parent entities, LDF Holdings, LLC, Lac du Flambeau Business Development Corporation and the Lac du Flambeau Band of Lake Superior

Chippewa Indians in an amount the court deems appropriate under the circumstances;  
and

5. For such other and further relief as the court deems just and proper.

BRIAN W. COUGHLIN, Debtor  
By his attorney,

Date: 3/23/2020

/s/ Richard N. Gottlieb, Esq.  
Richard N. Gottlieb, Esq. BBO # 547970  
Law Offices of Richard N. Gottlieb  
Ten Tremont Street  
Suite 11, 3<sup>rd</sup> Floor  
Boston, MA 02108  
(617) 742-4491  
[rnglaw@verizon.net](mailto:rnglaw@verizon.net)

# **Exhibit “A”**

Debtor 1 **Brian W. Coughlin**

Case number (if known)

4.1  
6**Inbox Credit**

Nonpriority Creditor's Name

**P.O. Box 881****Santa Rosa, CA 95402**

Number Street City State Zip Code

**Who incurred the debt?** Check one.☒ Debtor 1 only☐ Debtor 2 only☐ Debtor 1 and Debtor 2 only☐ At least one of the debtors and another☐ **Check if this claim is for a community debt****Is the claim subject to offset?**☒ No☐ Yes

Last 4 digits of account number

**HCAI****\$2,559.94**

When was the debt incurred?

**2019****As of the date you file, the claim is:** Check all that apply☐ Contingent☐ Unliquidated☐ Disputed**Type of NONPRIORITY unsecured claim:**☐ Student loans☐ Obligations arising out of a separation agreement or divorce that you did not report as priority claims☐ Debts to pension or profit-sharing plans, and other similar debts☒ Other. Specify **Payday Loan**4.1  
7**Lend Green**

Nonpriority Creditor's Name

**P.O. Box 221****Lac Du Flambeau, WI 54538**

Number Street City State Zip Code

**Who incurred the debt?** Check one.☒ Debtor 1 only☐ Debtor 2 only☐ Debtor 1 and Debtor 2 only☐ At least one of the debtors and another☐ **Check if this claim is for a community debt****Is the claim subject to offset?**☒ No☐ Yes

Last 4 digits of account number

**3572****\$1,594.91**

When was the debt incurred?

**2019****As of the date you file, the claim is:** Check all that apply☐ Contingent☐ Unliquidated☐ Disputed**Type of NONPRIORITY unsecured claim:**☐ Student loans☐ Obligations arising out of a separation agreement or divorce that you did not report as priority claims☐ Debts to pension or profit-sharing plans, and other similar debts☒ Other. Specify **Pay Day Loan**4.1  
8**LVNV Funding/Resurgent Capital**

Nonpriority Creditor's Name

**Attn: Bankruptcy****Po Box 10497****Greenville, SC 29603**

Number Street City State Zip Code

**Who incurred the debt?** Check one.☒ Debtor 1 only☐ Debtor 2 only☐ Debtor 1 and Debtor 2 only☐ At least one of the debtors and another☐ **Check if this claim is for a community debt****Is the claim subject to offset?**☒ No☐ Yes

Last 4 digits of account number

**5624****\$2,270.00**

When was the debt incurred?

**Opened 06/19****As of the date you file, the claim is:** Check all that apply☐ Contingent☐ Unliquidated☐ Disputed**Type of NONPRIORITY unsecured claim:**☐ Student loans☐ Obligations arising out of a separation agreement or divorce that you did not report as priority claims☐ Debts to pension or profit-sharing plans, and other similar debts☒ Other. Specify **Factoring Company Account Collection**

# **Exhibit “B”**

Greenarrow Loans  
P.O. Box 170  
Finley, CA 95435

Inbox Credit  
P.O. Box 881  
Santa Rosa, CA 95402

Internal Revenue Service  
P.O. Box 7346  
Philadelphia, PA 19101-7346

Lend Green  
P.O. Box 221  
Lac Du Flambeau, WI 54538

LVNV Funding/Resurgent Capital  
Attn: Bankruptcy  
Po Box 10497  
Greenville, SC 29603

Midland Credit Management, Inc.  
P.O. Box 51319  
Los Angeles, CA 90051-5619

Navient  
Attn: Bankruptcy  
Po Box 9640  
Wilkes-Barre, PA 18773

TrueAccord Collections  
303 2nd Street  
Suite 750 South  
San Francisco, CA 94107

Vlzhwaaswi, LLC d/b/a Loan at Last  
P.O. Box 1193  
Lac Du Flambeau, WI 54538

# **Exhibit “C”**

UNITED STATES BANKRUPTCY COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

In re  
BRIAN W. COUGHLIN,  
Debtor

IN PROCEEDINGS UNDER  
CHAPTER 13  
CASE NO.: 19-14142

**CERTIFICATE OF SERVICE**

I, Richard N. Gottlieb, Esq., do hereby certify that I have this day served a copy of the Debtor's Original Chapter 13 Plan dated December 4, 2019, by First-class mail postage paid and/or electronically via the CM/ECF Electronic Messaging System on the persons listed below.

Date: December 4, 2019

/s/ Richard N. Gottlieb, Esq.

Richard N. Gottlieb, Esq. BBO # 547970  
Law Offices of Richard N. Gottlieb  
Ten Tremont Street  
Suite 11, 3<sup>rd</sup> Floor  
Boston, Massachusetts 02108  
(617) 742-4491  
[rnglaw@verizon.net](mailto:rnglaw@verizon.net)

**PERSONS SERVED:**

**Carolyn Bankowski, Esq.**  
Chapter 13 Trustee  
(Served via CM/ECF)

**500 Fast Cash**  
515 "G" Street SE  
Miami, OK 74354

**American Web Loans**  
3910 W. 6th Avenue  
Box 27  
Stillwater, OK 74074

**AmeriCredit/GM Financial**  
Attn: Bankruptcy  
Po Box 183853  
Arlington, TX 76096

**Bank of America**  
4909 Savarese Circle  
F11-908-01-50  
Tampa, FL 33634

**Big Picture Loans**  
P.O. Box 704  
Watersmeet, MI 49969

**Capital One**  
Attn: Bankruptcy  
Po Box 30285  
Salt Lake City, UT 84130

**City Of Boston Cu**  
1 Union St Fl 3  
Boston, MA 02108

**Clarity Finance**  
P.O. Box 8  
Princeton, ME 04668

**Midland Credit Management, Inc.**  
P.O. Box 51319  
Los Angeles, CA 90051-5619

**Credit One Bank**  
P.O. Box 98873  
Las Vegas, NV 89193-8873

**CreditControl**  
5757 Phantom Drive  
Suite 330  
Hazelwood, MO 63042

**First Premier Bank**  
Attn: Bankruptcy  
Po Box 5524  
Sioux Falls, SD 57117

**Golden Valley Lending**  
635 East Highway 20 E  
Upper Lake, CA 95485

**Greenarrow Loans**  
P.O. Box 170  
Finley, CA 95435

**Inbox Credit**  
P.O. Box 881  
Santa Rosa, CA 95402

**Internal Revenue Service**  
P.O. Box 7346  
Philadelphia, PA 19101-7346

**Lend Green**  
P.O. Box 221  
Lac Du Flambeau, WI 54538

**LVNV Funding/Resurgent Capital**  
Attn: Bankruptcy  
Po Box 10497  
Greenville, SC 29603

**Navient**

Attn: Bankruptcy

Po Box 9640

Wilkes-Barre, PA 18773

**TrueAccord Collections**

303 2nd Street

Suite 750 South

San Francisco, CA 94107

**Vlzhwaaswi, LLC d/b/a Loan at Last**

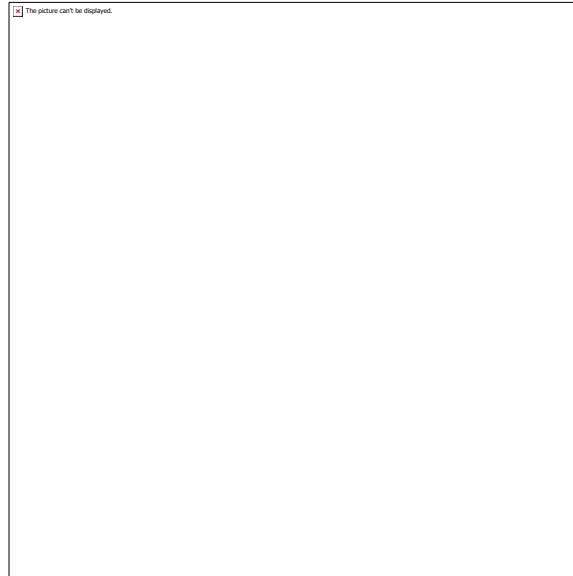
P.O. Box 1193

Lac Du Flambeau, WI 54538

# **Exhibit “D”**

Begin forwarded message:

On Wednesday, February 26, 2020, 11:58 AM, Linda Ehikpehale <[collections@lendgreen.com](mailto:collections@lendgreen.com)> wrote:



*Hello Brian,*

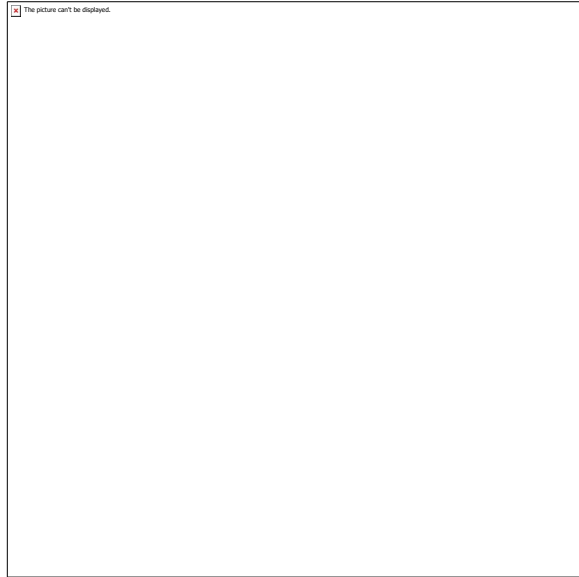
As earlier discussed , the email address to send the Power Of Attorney documents for your bankruptcy case is [administration@lendgreen.com](mailto:administration@lendgreen.com)

Keep in mind that you can always call us at 1-855-832-7227 , 8 AM - 7 PM (EST).

Thank you,

**Linda**  
Collections Specialist  
Lendgreen Collections Department

1-855-832-7227



Niiwin, LLC, d/b/a Lendgreen ("Lendgreen"), is a wholly owned subsidiary of LDF Holdings, LLC, a wholly owned subsidiary of the Lac du Flambeau Business Development Corporation, a wholly owned and operated economic arm and instrumentality of the Lac du Flambeau Band of Lake Superior Chippewa Indians ("Tribe"), a federally recognized Indian tribe. Lendgreen is organized and in good standing under the laws of the Tribe. Lendgreen is a duly licensed Financial Services Licensee of the Lac du Flambeau Tribal Lending Regulatory Authority, an independent regulatory body of the Tribe.

This is an expensive form of borrowing. Lendgreen loans are designed to assist you in meeting your short term borrowing needs and are not intended to be a long term financial solution. The Annual Percentage Rate ("APR") as applied to your loan will range depending on your payment schedule, pay frequency, loan term, and the amount of your loan. Late payments and incidents of non-payment may result in additional fees and collection activities as described in your loan agreement and as allowed by Tribal and applicable federal law. Lendgreen does not lend to residents of AR, CT, GA, MD, MN, NY, PA, VA, WV, WI, and to members of the military and their dependents. Availability of installment loans is subject to change at any time at the sole discretion of Lendgreen.

All offers are subject to credit approval. Lendgreen offers loans to consumers with varying degrees of creditworthiness. Prior to offering credit, Lendgreen may conduct a credit check through specialized credit bureaus. Lendgreen does not run credit checks with TransUnion, Experian, or Equifax.

Applications must be processed by speaking with a live Customer Care Specialist before 11:30 AM ET Monday-Friday to receive funds on the same business day. Funds for applications processed after 11:30 AM ET Monday-Friday will be delivered the next business day.

You are receiving this email as a Lendgreen customer or because you have expressed interest in a loan via an affiliate. If you wish to no longer receive our communications, please unsubscribe below.

[Read Lendgreen's Privacy Policy.](#)

If you'd like to unsubscribe and stop receiving these emails [click here](#).

# **Exhibit “E”**

On Tuesday, March 17, 2020, 9:08 AM, [customercare@lendgreen.com](mailto:customercare@lendgreen.com) wrote:



**150 DAYS OVERDUE AND IT IS BEING REPORTED TO CREDIT REPORTING AGENCIES**

**CALL 1-877-689-1848 NOW TO MAKE A PAYMENT.**

**RE: Lendgreen account #028083572-00**

**Balance Due: \$1,594.91**

Hi Brian,

Your loan is 150 past due. We have reported this issue to credit reporting agencies and your ability to receive a loan in the future may be impacted. [Call us now to set up a payment schedule.](#)

**CALL NOW TO CLEAR  
YOUR DEBT**

Alternatively, you can authorize a direct payment by sending the following email to [collections@lendgreen.com](mailto:collections@lendgreen.com):

*"I, Brian, authorize Lendgreen to debit the sum of \$\_\_\_\_\_ from my account on .*

*To verify my identity, the last 4 digits of my SSN are \_\_\_\_\_; the last 4 digits of my routing number are \_\_\_\_\_; and the last 4 digits of my account number are \_\_\_\_\_."*

*If you have any questions regarding this email, please do not hesitate to contact us. For instant, your self service*

[account](#) to review your loan details.

Regards,

Lendgreen Collections Department

[collections@lendgreen.com](mailto:collections@lendgreen.com)

1-877-689-1848

[www.lendgreen.com](http://www.lendgreen.com)

Niiwin, LLC, d/b/a Lendgreen ("Lendgreen"), is a wholly owned subsidiary of LDF Holdings, LLC, a wholly owned subsidiary of the Lac du Flambeau Business Development Corporation, a wholly owned and operated economic arm and instrumentality of the Lac du Flambeau Band of Lake Superior Chippewa Indians ("Tribe"), a federally recognized Indian tribe. Lendgreen is organized and in good standing under the laws of the Tribe. Lendgreen is a duly licensed Financial Services Licensee of the Lac du Flambeau Tribal Financial Services Regulatory Authority, an independent regulatory body of the Tribe.

All loan application decisions are made at Lendgreen's office located at 597 Peace Pipe Road, 2nd Floor, Lac du Flambeau, Wisconsin 54538 on the Tribe's reservation. If your loan application is approved by Lendgreen, your loan will be governed by Tribal law, applicable federal law, and the terms and conditions of your loan agreement.

This is an expensive form of borrowing. Lendgreen loans are designed to assist you in meeting your short term borrowing needs and are not intended to be a long term financial solution. The Annual Percentage Rate ("APR") as applied to your loan will range depending on your payment schedule, pay frequency, loan term, and the amount of your loan. Late payments and incidents of non-payment may result in additional fees and collection activities as described in your loan agreement and as allowed by Tribal and applicable federal law. Lendgreen does not lend to residents of AR, CT, GA, MD, MN, NY, PA, VA, WV, and WI or to members of the military and their dependents. Availability of installment loans is subject to change at any time at the sole discretion of Lendgreen.

Please do not reply to this email as we are unable to respond to messages sent to this address. For any inquiries please contact [customercare@lendgreen.com](mailto:customercare@lendgreen.com)

Mailing Address:  
NIIWIN, LLC d/b/a Lendgreen  
PO Box 221  
Lac du Flambeau, WI, 54538  
1-855-832-7227

Niiwin, LLC, d/b/a Lendgreen ("Lendgreen"), is a wholly owned subsidiary of LDF Holdings, LLC, a wholly owned subsidiary of the Lac du Flambeau Business Development Corporation, a wholly owned and operated economic arm and instrumentality of the Lac du Flambeau Band of Lake Superior Chippewa Indians ("Tribe"), a federally recognized Indian tribe. Lendgreen is organized and in good standing under the laws of the Tribe. Lendgreen is a duly licensed Financial Services Licensee of the Lac du Flambeau Tribal Lending Regulatory Authority, an independent regulatory body of the Tribe.

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Applications must be processed by speaking with a live Customer Care Specialist before 11:30 AM ET Monday-Friday to receive funds on the same business day. Funds for applications processed after 11:30 AM ET Monday-Friday will be delivered the next business day.

You are receiving this email as a Lendgreen customer or because you have expressed interest in a loan via an affiliate. If you wish to no longer receive our communications, please unsubscribe below.

[Read Lendgreen's Privacy Policy.](#)

If you'd like to unsubscribe and stop receiving these emails [click here](#).

# **Exhibit “F”**

2:06



[Voicemail](#)



**+1 (877) 329-4638**



message



call



video



mail



pay

Today

2:05 PM **Missed Call**

[Share Contact](#)

[Create New Contact](#)

[Add to Existing Contact](#)

[Add to Emergency Contacts](#)

[Share My Location](#)



Favorites



Recents



Contacts



Keypad



Voicemail

# **Exhibit “G”**

1:53



[< Recents](#)



**(877) 329-4638**

unknown



message



call



video



mail



pay

Today

1:52 PM **Missed Call**

[Share Contact](#)

[Create New Contact](#)

[Add to Existing Contact](#)

[Add to Emergency Contacts](#)

[Share My Location](#)



Favorites



Recents



Contacts



Keypad



Voicemail

UNITED STATES BANKRUPTCY COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

In re  
BRIAN W. COUGHLIN,  
Debtor

IN PROCEEDINGS UNDER  
CHAPTER 13  
CASE NO. 19-14142-FJB

**CERTIFICATE OF SERVICE**

I, Richard N. Gottlieb, Esq., hereby certify that I have this day served a copy of the Motion of the Debtor to Enforce the Automatic Stay and Affidavit of Debtor in Support of Motion of the Debtor to Enforce the Automatic Stay attached hereto upon on persons listed below, via electronic mail on the CM/ECF system.

Date: 3/23/2020

/s/ Richard N. Gottlieb, Esq.

Richard N. Gottlieb, Esq. BBO # 547970  
Law Offices of Richard N. Gottlieb  
Ten Tremont Street  
Suite 11, 3<sup>rd</sup> Floor  
Boston, MA 02108  
(617) 742-4491  
[rnglaw@verizon.net](mailto:rnglaw@verizon.net)

Persons served:

Carolyn Bankowski, Esq.  
Chapter 13 Trustee  
(Served via CM/ECF)

Niiwin, LLC d/b/a "Lendgreen"  
P.O. Box 221  
Lac Du Flambeau, Wisconsin 54538

LDF Holdings, LLC  
597 Peace Pipe Road,  
2<sup>nd</sup> Floor  
Lac du Flambeau, Wisconsin 54538

Lac du Flambeau Business Development Corporation  
597 Peace Pipe Road,  
2<sup>nd</sup> Floor  
Lac du Flambeau, Wisconsin 54538

Lac du Flambeau Band of Lake Superior Chippewa Indians  
597 Peace Pipe Road,  
2<sup>nd</sup> Floor  
Lac du Flambeau, Wisconsin 54538