

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

In re:

ALACHUA GOVERNMENT SERVICES,
INC.,¹

Debtor.

Chapter 11

Case No. 25-11289 (JKS)

Re Docket Nos. 242, 284 & 286

**ORDER GRANTING THE MOTION OF THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR AN ORDER PURSUANT TO BANKRUPTCY RULE
2004 AUTHORIZING DISCOVERY OF THE DEBTOR AND THE DEBTOR'S PARENT**

Upon consideration of the *Motion of the Official Committee of Unsecured Creditors for an Order Pursuant to Bankruptcy Rule 2004 Authorizing Discovery of the Debtor and the Debtor's Parent* (the "Motion")² filed on September 29, 2025, seeking authority for the Official Committee of Unsecured Creditors (the "Committee") to conduct an examination pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Rule 2004-1 of the Local Rules of Bankruptcy Procedure (the "Local Bankruptcy Rules") of the United States Bankruptcy Court for the District of Delaware (the "Court"), including by propounding formal document and deposition demands on the Debtor Alachua Government Services, Inc. (the "Debtor") and issuing subpoenas compelling the production of documents to National Resilience Holdco, Inc. (the "Parent"), pursuant to Bankruptcy Rule 9016 and Federal Rule of Civil Procedure 45, and any responses thereto; the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated February 29, 2012; and the Court having found that this is a core

¹ The debtor in this chapter 11 case (the "Debtor" or "AGSI"), along with the last four digits of its federal tax identification number is: Alachua Government Services, Inc. (5370). The Debtor's mailing address is 13200 NW Nano Court, Alachua, Florida 32615.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

proceeding pursuant to 28 U.S.C. § 157(b)(2), and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Rule 2004 Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that the Committee's notice of the Motion and opportunity for a hearing on the Motion were appropriate and no other notice need be provided; and the Court having reviewed the Motion; and this Court having determined that the legal and factual bases set forth in the Rule 2004 Motion establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is **HEREBY ORDERED THAT**

1. The relief requested in the Motion is GRANTED as set forth herein.
2. The Committee is authorized to propound formal document requests on the Debtor pursuant to Rule 2004 of the Bankruptcy Rules and Rule 2004-1 of the Local Bankruptcy Rules, as set forth herein
3. The Committee is authorized to issue subpoenas requesting the production of documents, pursuant to Bankruptcy Rule 9016 and Federal Rule of Civil Procedure 45, on the Parent as set forth herein.
4. The document requests the Committee provided to the Debtor on July 30, 2025, and August 27, 2025 (the "Debtor Requests") are deemed to have been served on the Debtor pursuant to Rule 2004 of the Bankruptcy Rules as of those dates, without prejudice to the Committee's right to seek further examination or discovery, whether pursuant to Rule 2004 or otherwise.

5. On or before October 31, 2025, the Debtor will (a) provide objections and responses to the Debtor Requests pursuant to Rule 34 of the Federal Rules of Civil Procedure, as incorporated by the Federal Rules of Bankruptcy Procedure, and (b) substantially complete the production of documents not subject to an unresolved objection.

6. The document requests the Committee provided to the Parent on August 8, 2025, and August 27, 2025 (the “Parent Requests”) are deemed to have been served on the Parent pursuant to Rule 2004 of the Bankruptcy Rules as of those dates, without prejudice to the Committee’s right to seek further examination or discovery, whether pursuant to Rule 2004 or otherwise, and without prejudice to the Parent’s right to object to that further examination or discovery.

7. On or before October 31, 2025, the Parent will (a) provide objections and responses to the Parent Requests pursuant to Rule 45 of the Federal Rules of Civil Procedure, as incorporated by the Federal Rules of Bankruptcy Procedure, and (b) substantially complete the production of documents not subject to an unresolved objection; *provided that* the October 31, 2025 substantial completion deadline applies only to the Committee’s “highest priority” requests as identified in the Committee’s August 27, 2025 letter to the Parent; (2) the Parent will substantially complete the production of documents responsive to the remaining requests (to the extent they are not subject to an unresolved objection) on or before November 14, 2025; and (3) email discovery shall be governed by the following deadlines:

- October 31, 2025: Deadline for the Committee to inform the Parent whether the Committee continues to seek the production of emails.
- November 3, 2025: Deadline for the Committee to propose custodians and search terms for any email production.

- November 7, 2025: Deadline for the Committee and the Parent to negotiate custodians and search terms, provided that if the parties reach an impasse, the parties shall request that the Court resolve any unresolved disputes.
- November 21, 2025: Provided that no unresolved dispute exists concerning custodians and search terms, deadline for the Parent to substantially complete the email production.

8. Depositions under Rule 2004 shall not proceed as to the Debtor, its independent director, or Chief Restructuring Officer unless: (a)(i) the Debtor certifies that it has substantially completed its production of documents to the Committee, and (ii) the Debtor and the Committee agree to the deposition; or (b) the Court issues an order authorizing the deposition in accord with section F.1. of the Court's Chambers Procedures, *provided that* the Debtor shall have five (5) business days to respond to the Committee's letter.

9. Depositions under Rule 2004 shall not proceed as to the Parent or any person or entity currently or formerly affiliated with the Parent unless: (a) the Parent and the Committee agree to the deposition; or (b) the Court issues an order authorizing the deposition in accord with section F.1. of the Court's Chambers Procedures, *provided that* the Parent shall have five (5) business days to respond to the Committee's letter.

10. The Committee is authorized to serve supplemental requests for the production of documents, and the Debtor and the Parent shall serve written responses and objections to any supplemental requests and produce all documents not subject to any unresolved objections within 14 days of service thereof.

11. This Order is without prejudice to the rights of the Committee to apply to the Bankruptcy Court for further discovery of the Rule 2004 Parties or any other person or entity and nothing herein shall constitute a ruling on the permissible scope of discovery.

12. The Court shall retain exclusive jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: _____, 2025
Wilmington, Delaware

Honorable J. Kate Stickles
United States Bankruptcy Judge

Dated: October 16th, 2025
Wilmington, Delaware


J. KATE STICKLES
UNITED STATES BANKRUPTCY JUDGE