

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Baltimore Division)**

In re: *
E. E. MARR ERECTORS, INC., * **Case No. 25-11237-NVA**
Debtor. *

* * * * *

**TRUSTEE’S MOTION TO SELL PROPERTY FREE AND
CLEAR OF LIENS, CLAIMS, ENCUMBRANCES AND INTERESTS
(Debtor’s Tools and Equipment)**

Morgan W. Fisher, the Chapter 7 Trustee herein (the “Trustee”), by his undersigned counsel, pursuant to 11 U.S.C. § 363(f) and Fed. R. Bankr. P. 6004(c), files this Motion for Authority to Sell Property Free and Clear of All Liens, Claim, Encumbrances and Interests (the “Motion”). In support of the Motion, the Trustee states as follows:

Introduction

This Motion seeks entry of an order (1) authorizing the sale of the Debtor’s Tools and Equipment (defined herein) free and clear of all liens, claim, encumbrances and interests, and (2) waiving the stay imposed by Fed. R. Bankr. P. 6004(h) should there be no timely objections filed to the Motion so as to enable the Trustee to close promptly on the auction/sale of the Debtor’s Tools and Equipment.

Jurisdiction and Venue

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. Venue is appropriate in this Court pursuant to 28 U.S.C. §§ 1408 and 1409. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2)(A), (N) and (O).

Parties and Background

2. The debtor herein (the “Debtor”) commenced the above-captioned bankruptcy case (the “Bankruptcy Case”) by filing of a voluntary petition under chapter 7 of the Bankruptcy Code on February 14, 2025 (the “Petition Date”).

3. Morgan W. Fisher was appointed to serve as interim trustee in this case.

Debtor’s Tools and Equipment

4. The Trustee seeks authority to liquidate the following tools and equipment of the Debtor (the “Debtor’s Tools and Equipment”) by auction free and clear of liens, claims, encumbrances and interests:

- (a) Thirteen (13) Lincoln Electric Ranger Motor Driven Welders
- (b) Eleven (11) 11 sets of welding cables (fitted for the above Lincoln welders)
- (c) Two (2) acetylene tank cars
- (d) Two (2) sets of acetylene welding cables
- (e) One (1) Millermatic 130 Welding Power Source wire feeder with tank, gauges, and cable
- (f) Twenty-seven (27) ladders, ranging from 10’ to 40’ feet in length
- (g) Two (2) battery chargers/starters
- (h) Assorted tools, including rakes, shovels, and sledge hammers
- (i) Large group of power tools, including drills, hammer drills, grinders, and caulk guns
- (j) Large number of garage tools, including jack stands, bottle jack, shop vacuum, a creeper, drop light, and a floor jack
- (k) One (1) Ryobi 2-cycle gas powered weed whacker
- (l) One (1) Power washer with Honda motor, 2200 PSI
- (m) Group of welding torches and gauges
- (n) Six (6) laser levels
- (o) One (1) Ryobi 10” compound miter saw
- (p) Ten (10) surveyor/laser level tripods
- (q) One (1) electric pallet jack
- (r) One (1) Hyster propane powered forklift
- (s) One (1) Danville 2033 scissor lift

- (t) Approximately sixty (60) construction area safety fencing sections with an unknown quantity of metal base connectors
- (u) Numerous metal gas cans

5. The Debtor's Tools and Equipment have not been appraised. The Debtor has scheduled them as having a value of approximately \$115,535.00. A more detailed and itemized list of the Debtor's Tools and Equipment being sold at auction by the Trustee's Auctioneer (defined below) is attached hereto as *Exhibit A*.

The Liens

6. The Debtor's Tools and Equipment are encumbered only by tax liens in favor of the State of Maryland and the Internal Revenue Service (the "Lienholders"). See Proof of Claim No. 1 filed by the Internal Revenue Service; *State of Maryland v. E.E. Marr Erectors, Inc.*, Case Nos. 24-L-21-001363, 24-L-21-001370, 24-L-22-001975, 24-L-22-006496, 24-L-22-006985, 24-L-22-010105, and 24-L-22-012507.¹

The Trustee's Auctioneer and The Proposed Sale/Auction

7. The undersigned met with the Debtor's counsel and a representative of the Debtor at the Debtor's business premises on February 21, 2025, to, among other things, take a video inventory of the Debtor's Tools and Equipment and other assets on the Debtor's schedules. Alex Cooper Auctioneers (the "Trustee's Auctioneer") was provided with a link to the video inventory, and, responding to that video inventory, informed the Trustee that it believed that a lot of the Debtor's Tools and Equipment had value for the estate. As such, on February 26, the undersigned met with the Auctioneer at the Debtor's business premises for the Auctioneer to conduct its own inspection of the Debtor's Tools and Equipment. After doing so, the

¹ A UCC search did not disclose the existence of any other liens.

Auctioneer confirmed that a lot of the Debtor's Tools and Equipment has value for the estate.²

8. Against this background, on February 13, 2025, the Trustee filed an application seeking to employ the Trustee's Auctioneer to conduct an auction of the Debtor's Tools and Equipment. (Doc. No 20)

9. The basic terms of that engagement are that the Trustee's Auctioneer will receive a twenty percent (20%) seller's commission. The Trustee's Auctioneer will also collect from the successful bidder a buyer's premium of not more than eighteen percent (18%).

Additionally, the Auctioneer expend between \$1,800.00 to \$2,400.00 to remove the Debtor's Tools and Equipment from the Debtor's leased premises and transport it to and store it at the auction site. Finally, the Auctioneer will be charged a flat fee of \$250.00 and 3% of the sale price of the Debtor's Tools and Equipment for the use of a third-party digital, bidding plat form that allows buyers to place bids, enabling rapid and effective negotiations based on real-time price and volume. The Trustee's Auctioneer seeks to be reimbursed for these actual, necessary expenditures.

10. The auction is expected to take place on April 15, 2025, but that is subject to change to a later date. On-line marketing for the auction will occur for three weeks prior to the auction date. The Debtor's Tools and Equipment will be sold/auctioned on an "as is/where is," with no warranties implied or stated.

11. A number of the Debtor's Tools and Equipment have been removed from the Debtor's leased premises. However, some items, such as the electric pallet jack, the Hyster propane powered forklift, the Danville 2033 scissor lift, and the safety fencing sections, were too

² Not all of the Debtor's Tools and Equipment is saleable or has value. The Auctioneer is only selling the Debtor's Tools and Equipment that it believes has value for the estate.

heavy and took up too much storage room to relocate. As such, they are being kept at the Debtor's leased premises to be picked up by any successful bidders. Successful bidders will be required to pick up this heavy equipment on a particular date within a week after the auction.

Legal Standard

12. Section 363(f) of the Bankruptcy Code provides that “[t]he trustee may sell property . . . free and clear of any interest in such property of an entity other than the estate, only if . . . “(2) such entity consents; [or] (5) such entity could be compelled, in a legal or equitable proceeding, to accept a money satisfaction of such interest.” 11 U.S.C. § 363(f)(2), (5).

13. Section 363(f) of the Bankruptcy Code is stated in the disjunctive. Thus, it is only necessary for the Trustee to satisfy one of the five conditions set forth in section 363(f).

14. “A sale under § 363 ‘requires notice and a hearing and is subject to court approval and must be supported by an articulated business justification, good business judgment, or sound business reasons.’” *Matter of VCR I, L.L.C.*, 922 F.3d 323, 326 (5th Cir. 2019) (quoting *The Cadie Co. v Mims (In re Moore)*, 608 F.3d 253, 263 (5th Cir. 2010)); *see also, In re Riffin*, No. 10-11248-DK, 2010 WL 3260131, at *4 (Bankr. D. Md. Aug. 18, 2010) (J. Keir), *subsequently aff'd sub nom. Riffin v. Friedman*, 446 F. App'x 614 (4th Cir. 2011) (“The test for approval of an agreement by the Trustee affecting property of the estate is whether the agreement is within reasonable business judgment. The court does not substitute its own judgment as to what would be best for the estate but rather determines if the Trustee's proposed agreement falls within reasonable judgment under the circumstances of the case.”).

15. Bankruptcy Rule 6004(h) provides that “[a]n order authorizing the use, sale, or lease of property other than cash collateral is stayed until the expiration of 14 days after entry of the order, unless the court orders otherwise.” However, “[s]ince the purpose of the rule is to protect

the rights of an objecting party, the court should eliminate the 14-day stay period and allow the sale or other transaction to close immediately where there has been no objection to the procedure.” *In re Borders Grp., Inc.*, 453 B.R. 477, 486 (Bankr. S.D.N.Y. 2011) (relying on and citing to 10 Collier on Bankruptcy, ¶ 6004.11 in light of neither the rule or the Advisory Committee Notes addressing the circumstances in which a court should wain the applicable stay).

Relief Requested

16. The Trustee seeks entry of an Order (1) authorizing the auction/sale of the Debtor’s Tools and Equipment free and clear of all liens, claim, encumbrances and interests and (2) waiving the stay imposed by Fed. R. Bankr. P. 6004(h) should there be no timely objections filed to the Motion so as to enable the Trustee to close promptly on the auction of the Debtor’s Tools and Equipment.

A. Authority Under 11 U.S.C. § 363(f)

17. As discussed below, the Trustee believes that the auction/sale of the Debtor’s Tools and Equipment is authorized under section 363(f)(5) and/or will be authorized under section 363(f)(2).

1. § 363(f)(2) - Consent

18. The Trustee believes and avers that the Lienholders will consent to the sale of the Debtor’s Tools and Equipment. The Trustee is currently discussing this matter with the Lienholders. To the extent the Trustee can obtain a consent from the Lienholders, the sale will be authorize under section 363(f)(2).

2. § 363(f)(5) - Legal Proceeding/Compelled to Accept Money Satisfaction

19. Even if the Lienholders will not consent, their tax liens are subject to subordination under 11 U.S.C. §724(b). Therefore, the sale of the Debtor’s Tools and Equipment is authorized

under section 363(f)(5).

20. Subordinating a tax lien under Section 724(b)(2) is a legal proceeding within the meaning of Section 363(f)(5). *In re Grand Slam U.S.A., Inc.*, 178 B.R. 460, 464 (E.D. Mich. 1995) (“Although Section 724(b)(2) contains ‘distribution’ language, its operation falls squarely within the language of Section 363(f)(5), inasmuch as it creates a mechanism by which lien creditors are compelled to receive less than full payment for their interest. Thus, the subordination provision within this Section is as much ‘a legal ... proceeding [that forces the lien holder] to accept a money satisfaction of such interest’”) (alteration in original); *In re A.G. Van Metre, Jr., Inc.*, 155 B.R. 118, 121 (Bankr. E.D. Va. 1993), *subsequently aff’d*, 16 F.3d 414 (4th Cir. 1994) (“It would be illogical to require full satisfaction of statutory tax liens as a condition to the approval of sales pursuant to § 363(f)(3) when § 724(b) explicitly provides otherwise. Although the defendant correctly states §§ 361(3) and 363(e) generally require ‘indubitable equivalence’ as ‘adequate protection’ of perfected secured claims, § 724(b) sets forth a definite exception to this general rule in cases involving statutory tax liens.”).

B. Business Judgment

21. As stated above, the Trustee’s Auctioneer, having inspected the Debtor’s Tools and Equipment, has determined that the Debtor’s Tools and Equipment has value to the estate. The Trustee has determined that an auction of the Debtor’s Tools and Equipment is the best and most cost effective manner to sell the Debtor’s Tools and Equipment.

C. Waiver of Fed. R. Bankr. P. 6004(h) Stay

22. As noted above, a number of the Debtor’s Tools and Equipment have been removed from the Debtor’s leased premises. However, some items, such as the electric pallet jack, the Hyster propane powered forklift, the Danville 2033 scissor lift, and the safety fencing sections,

were too heavy and took up too much storage room to relocate. As such, they are being kept at the Debtor's leased premises to be picked up by any successful bidders. Successful bidders will be required to pick up this heavy equipment on a specific date within a week after the auction date.

23. In an effort to minimize the amount of post-petition rent to be paid to the Debtor's landlord (*i.e.*, to limit any rent to that due and owing for April of 2025), the Trustee requests a waiver of Fed. R. Bankr. P. 6004(h) due to a possible issue of the pendency of the stay between the time of entry of the requested order and the closing on the auction of the Debtor's Tools and Equipment. As such, the Trustee requests the waiver of the stay imposed by Fed. R. Bankr. P. 6004(h) should there be no timely objections filed to the Motion so as to enable the Trustee to close promptly on the auction of the Debtor's Tools and Equipment. Absent the waiver of the stay, the estate will likely incur the expense of an additional months' worth of rent for the month of May.

24. As required by Local Bankruptcy Rule 9013-2, the Trustee hereby states that no memorandum will be filed and that he will rely solely upon this Motion.

WHEREFORE, Morgan W. Fisher, the Chapter 7 Trustee, respectfully requests entry of an Order providing for the following relief:

- A. That the sale/auction of the Debtor's Tools and Equipment be approved;
- B. That the Trustee be authorized to sell the Debtor's Tools and Equipment on an "as is/where is," with no warranties implied or stated, free and clear of all liens, claims, encumbrances and interests to any successful bidders at the auction of the Debtor's Tools and Equipment, with such liens, claims, encumbrances and interests, if any, to attach to the proceeds of sale, subject to the extent of their validity and priority; and

C. That the Trustee be authorized to disburse from the sale proceeds, directly or through an intermediary, the approved fees and expenses of the Trustee's Auctioneer all as set forth in the Application to Employ Auctioneer for Trustee (Doc. No. 20); and

D. That the stay imposed by Fed. R. Bankr. P. 6004(h) be waived should there be no timely objections filed to the Motion so as to enable the Trustee to close promptly on the sale of the Debtor's Tools and Equipment; and

E. That the Trustee be authorized to take all actions necessary to consummate the sale/auction of the Debtor's Tools and Equipment; and

F. That the Trustee be granted such other and further relief as is just and equitable.

/s/ Craig B. Leavers
Craig B. Leavers, Bar No. 26914
P.O. Box 306
Cockeysville, Maryland 21030
(443) 318-4526
Craig@LeaversLaw.com

(Attorney for the Trustee)

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the 24th day of March, 2025, a copy of the foregoing was served on the parties listed below by electronic service via CM/ECF:

Daniel Alan Staeven, Esq.
Frost & Associates, LLC
839 Bestgate Road, Suite 400
Annapolis, Maryland 21401
(Attorney for Debtor)

And on the parties listed below by first class mail, postage prepaid:

Office of the United States Trustee
101 West Lombard Street, Suite 2625
Baltimore, Maryland 21201

E. E. Marr Erectors, Inc.
2039 Hollins Ferry Road
Baltimore, Maryland 21230
(Debtor)

Douglas O'Donnell, Commissioner
Internal Revenue Service
1111 Constitution Avenue, NW
Washington, DC 20224

Erek L. Barron
United States Attorney
for District of Maryland
36 South Charles Street, 4th Floor
Baltimore, Maryland 21021

Renee Nacrelli, Esq.
Assistant Attorney General
Office of the Maryland Attorney General
St. Paul Plaza
200 St. Paul Place
Baltimore, Maryland 21202
(Principal Counsel for Comptroller of Maryland)

Brooke Lierman
Comptroller of Maryland
Goldstein Treasury Building
80 Calvert Street
Annapolis, Maryland 21404-0466

And on the parties listed below by certified mail:³

The Honorable Pamela Bondi
Attorney General of the United States
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530

/s/ Craig B. Leavers
Craig B. Leavers

³ Pursuant to Fed. R. Civ. P. 4(i)(1)(B) and the Department of Justice manual 5-5.124, service must be made upon the U.S. Attorney General by certified mail.



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Consignor: B53446

Craig Leavers
 Law Offices of Craig B. Leavers
 P.O Box 306
 Cockeysville, MD 21030
 Phone:443-318-4526

Lot#	Description	Quantity
	E. E. Marr Erectors Welding Equipment	1. 00
1	A Lincoln Electric Ranger Motor Driven Welder Model 225, hours are 3354. Undernumber: 14552.1 Condition: Functionality unknown Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
2	A Lincoln Electric Ranger Motor Driven Welder Model 250, hours are 6267. Undernumber: 14552.2 Condition: Functionality unknown Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
3	A Lincoln Electric Ranger Motor Driven Welder Model 225, hours are 4130. Undernumber: 14452.3 Condition: Functionality unknown Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
4	A Lincoln Electric Ranger Motor Driven Welder Model 250 GXT, hours unknown. Undernumber: 14452.4 Condition: Functionality unknown Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
5	A Lincoln Electric Ranger Motor Driven Welder Model 250, hours are 6843. Undernumber: 14552.5 Condition: Functionality unknown Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
6	A Lincoln Electric Ranger Motor Driven Welder Model 225, hours are	1. 00



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Lot#	Description	Quantity
	3389. Undernumber: 14552.6 Condition: Functionality unknown Pre-Sale Estimate: 20.00 - 10,000.00	
7	A Lincoln Electric Ranger Motor Driven Welder Model 225, hours are 3271. Undernumber: 14552.7 Condition: Functionality unknown Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
8	A Lincoln Electric Ranger Motor Driven Welder Model 250 GXT, hours unknown. Undernumber: 14552.8 Condition: Functionality unknown Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
9	A Lincoln Electric Ranger Motor Driven Welder Model 250 GXT, hours unknown. Undernumber: 14552.9 Condition: Functionality unknown Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
10	A Lincoln Electric Ranger Motor Driven Welder Model 225, hours are 4272. Undernumber: 14552.10 Condition: One tire off rim. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
11	A Lincoln Electric Ranger Motor Driven Welder Model 9, hours are 1212. Undernumber: 14552.11 Condition: Functionality unknown Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
12	A Lincoln Electric Ranger Motor Driven Welder Model 250 GXT, hours are 2800. Undernumber: 14552.12 Condition: Functionality unknown	1. 00



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Lot#	Description	Quantity
	Pre-Sale Estimate: 20.00 - 10,000.00	
12a	A Lincoln Electric Ranger Motor Driven Welder Model 250 GXT, hours unknown. Undersumber: 14452.12A Condition: Functionality unknown	1.00
	Pre-Sale Estimate: 20.00 - 10,000.00	
13	A Lincoln Electric Ranger Motor Driven Welder Model 250, hours are 6605. Undersumber: 14552.13 Condition: Functionality unknown	1.00
	Pre-Sale Estimate: 20.00 - 10,000.00	
14	Two (2) Welding Cables Undersumber: 14552.14 Condition: Both have tape repairs.	1.00
	Pre-Sale Estimate: 20.00 - 10,000.00	
15	Three (3) Welding Cables Undersumber: 14552.15 Condition: All with tape repairs.	1.00
	Pre-Sale Estimate: 20.00 - 10,000.00	
16	Two (2) Welding Cables Undersumber: 145525.16 Condition: Both have tape repairs.	1.00
	Pre-Sale Estimate: 20.00 - 10,000.00	
17	Two (2) Welding Cables Undersumber: 14552.17 Condition: Both have tape repairs.	1.00
	Pre-Sale Estimate: 20.00 - 10,000.00	
18	Three (3) Welding Cables Undersumber: 14552.18 Condition: All with tape repairs.	1.00
	Pre-Sale Estimate: 20.00 - 10,000.00	
19	Three (3) Welding Cables Undersumber: 14552.19	1.00



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Lot#	Description	Quantity
	Condition: All with tape repairs.	
	Pre-Sale Estimate: 20.00 - 10,000.00	
20	Four (4) Welding Cables Undernumber: 14452.20 Condition: All with tape repairs.	1. 00
	Pre-Sale Estimate: 20.00 - 10,000.00	
21	Four (4) Welding Cables Undernumber: 14552.21 Condition: All with tape repairs.	1. 00
	Pre-Sale Estimate: 20.00 - 10,000.00	
22	Four (4) Welding Cables Undernumber: 14552.22 Condition: All with tape repairs.	1. 00
	Pre-Sale Estimate: 20.00 - 10,000.00	
23	Three (3) Welding Cables Undernumber: 14552.23 Condition: All with tape repairs.	1. 00
	Pre-Sale Estimate: 20.00 - 10,000.00	
24	Four (4) Welding Cables Undernumber: 14552.24 Condition: All with tape repairs.	1. 00
	Pre-Sale Estimate: 20.00 - 10,000.00	
25	Two (2) Acetylene Welding Cables One has multiple gauges and a torch attached. Undernumber: 14552.25 Condition: All with tape repairs.	1. 00
	Pre-Sale Estimate: 20.00 - 10,000.00	
26	Two (2) Acetylene Tank Carts Undernumber: 14552.26 Condition: As is.	1. 00
	Pre-Sale Estimate: 20.00 - 10,000.00	
27	Two (2) Acetylene Tank Carts Undernumber: 14552.27 Condition: As is.	1. 00
	Pre-Sale Estimate: 20.00 - 10,000.00	
28	A Pallet Jack	1. 00



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Lot#	Description	Quantity
	Undernumber: 14552.28 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	
29	A 20 Foot Werner Fiber Glass Extension Ladder Undernumber: 14552.29 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
30	A Werner Fiber Glass Extension Ladder Possibly 25 foot. Undernumber: 14552.30 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
31	A 10 Foot Louisville Folding Ladder Undernumber: 14552.31 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
32	A Werner 24 Foot Fiber Glass Extension Ladder Undernumber: 14552.32 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
33	A 10 Foot Werner Extension Ladder Section Undernumber: 14452.33 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
34	A Werner 16 Foot Fiber Glass Extension Ladder Undernumber: 14552.34 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
35	A 25 Foot Fiber Glass Extension Ladder Undernumber: 14552.35 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
36	A Louisville 24 Foot Fiber Glass Extension Ladder Undernumber: 14552.36 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
37	A 20 Foot Werner Fiber Glass Extension Ladder Undernumber: 14552.37 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
38	A 24 Foot Werner Fiber Glass Extension Ladder Undernumber: 14552.38 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00



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Lot#	Description	Quantity
39	A 24 Foot Werner Fiber Glass Extension Ladder Undernumber: 14552.39 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
40	A 24 Foot Werner Fiber Glass Extension Ladder Undernumber: 14552.40 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
41	A 24 Foot Werner Fiber Glass Extension Ladder Undernumber: 14552.41 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
42	A Louisville 24 Foot Extension Ladder Undernumber: 14552.42 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
43	A 16 Foot Werner Fiber Glass Extension Ladder Undernumber: 14522.43 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
44	A Miller, Millermatic 130 Welding Power Source Wire feeder with tank, gauges and cable. Undernumber: 14552.44 Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
45	A 6 Foot Werner Folding Ladder Undernumber: 14552.45 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
46	An 8 Foot Werner Folding Ladder Undernumber: 14552.46 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
47	An 8 Foot Werner Folding Ladder Undernumber: 14552.47 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
48	An 8 Foot Fiber Glass Folding Ladder Undernumber: 14552.48 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
49	A 6 Foot Werner Fiber Glass Folding Ladder Undernumber: 14552.49 Condition: As is.	1. 00



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Lot#	Description	Quantity
	Pre-Sale Estimate: 20.00 - 10,000.00	
50	A 6 Foot Werner Fiber Glass Folding Ladder Undernumber: 14552.50 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
51	Two New Metal Rodent Traps Undernumber: 14552.51 Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
52	A Water Driver Power Washer With Honda motor, 2200 PSI. Undernumber: 14552.52 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
53	A 9 Foot Fiberglass Folding Ladder Undernumber: 14552.53 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
54	A Green Bull 12 Foot Fiber Glass Folding Ladder Undernumber: 14552.54 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
55	A Werner 12 Foot Fiber Glass Folding Ladder Undernumber: 14552.55 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
56	A 16 Foot Werner Fiberglass Extension Ladder Undernumber: 14552.56 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
57	Five (5) Highway Safety Cones Undernumber: 14552.57 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
58	A Nappa 225amp Battery Charger/Starter Undernumber: 14552.58 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
59	A DieHard Multi-Amp Engine & Battery Starter Undernumber: 14552.59 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
60	Four Surveyors Tripods	1. 00



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Lot#	Description	Quantity
	Undernumber: 14552.60 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	
61	Assorted Garage Tools Including a pair of jack stands, bottle jack, Ridgid shop vacuum, a creeper, drop light, and a floor jack.	1. 00
	Undernumber: 14552.61 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	
62	Ryobi 2-cycle 25cc Weed Whacker Gas powered.	1. 00
	Undernumber: 14552.62 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	
63	Assorted Tools Including shovels, sledge hammers, a digging bar, and two levels.	1. 00
	Undernumber: 14552.63 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	
64	Assorted Hand Tools Including shovels, hoes, sledge hammers, a pry bar, and a level.	1. 00
	Undernumber: 14552.64 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	
65	Assorted Tools Including rakes, shovels, sledge hammers, and snow shovel.	1. 00
	Undernumber: 14552.65 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	
66	Assorted Tools Including shovels, brooms, and sledge hammers.	1. 00
	Undernumber: 14552.66 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	
67	Four (4) Towing Items with a Post Persuader Including a cable, two ropes, and a large strap. Together with a post driver.	1. 00
	Undernumber: 14552.67 Condition: Two ropes are frayed. Pre-Sale Estimate: 20.00 - 10,000.00	



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Lot#	Description	Quantity
68	Assorted Tool Boxes Including two nut & bolt boxes, and a neon yellow hard hat. Undernumber: 14552.68 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
69	Five (5) Boxed Power Tools Including a Hilti drill; two Millwaukee drills, one a hammer drill; and two Makita half inch drills. Undernumber: 14552.69 Condition: All run. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
70	Large Group of Electric Power Tools Undernumber: 14552.70 Condition: None function. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
71	Three (3) Retractable Safety Lines Undernumber: 14552.71 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
72	Three (3) Retractable Safety Lines Including five pipe wrenches, the longest 30 in.; a grabber, two hammers, a tape measurer and a large strap ratchet. Undernumber: 14552.72 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
73	Two (2) Ryobi Battery Operated Tools With several batteries and two chargers. Undernumber: 14552.73 Condition: Both chargers light-up. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
74	Assorted Tool Related Items Including two Hilti tool cases with accessories, a shop light (without stand), a group of drill bits, a group of grinding wheels, and assorted tool handles. Undernumber: 14552.74 Condition: All function. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
75	A Group of Welding Torches & Gauges	1. 00



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Lot#	Description	Quantity
	Undernumber: 14552.75 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	
76	A Robotoolz Cased Level Undernumber: 14552.76 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1.00
77	A Topcon AT/B Level Undernumber: 14552.77 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1.00
78	A CST/Berger Cased Level Undernumber: 14552.78 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1.00
79	A Topcon AT/B Level Undernumber: 14552.79 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1.00
80	A Topcon AT/B Level Undernumber: 14552.80 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1.00
81	A Bosch GCL 100-80C Level Undernumber: 14552.81 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1.00
82	Five (5) Assorted Electric Tools Including a Milwaukee, DeWalt, and Ridgid drill; a Black & Decker grinder; with a Hilti HDM 500 caulk gun. Undernumber: 14552.82 Condition: All function. Pre-Sale Estimate: 20.00 - 10,000.00	1.00
83	Three (3) Grinders & Two (2) Caulk Guns Including a Ridgid, a Makita, and a DeWalt grinder; with two Hilti HDM 500 caulk guns. Undernumber: 14552.83 Condition: All function. Pre-Sale Estimate: 20.00 - 10,000.00	1.00
84	Four (4) Electric Power Tools Including DeWalt, Milwaukee, and Ryobi, drills; with a DeWalt grinder, and a Hilti MD 2000 caulk gun. Undernumber: 14552.84 Condition: All function.	1.00



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Lot#	Description	Quantity
	Pre-Sale Estimate: 20.00 - 10,000.00	
85	Ryobi 10 inch Compound Miter Saw Unused. Undernumber: 14552.85 Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
86	Four (4) Electric Power Tools & A Level Includes DeWalt, Ridgid, and Milwaukee drills and a Makita grinder. Undernumber: 14552.86 Condition: All function. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
87	Four (4) Electric Power Tools Including three DeWalt grinders, and a Hilti UD 16 drill; with a Hilti HDM 500 caulk gun. Undernumber: 14552.87 Condition: All function. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
88	Four (4) Tins of Welding Sticks Undernumber: 14552.88 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
89	Seven (7) Partial Packs of Welding Sticks Undernumber: 14552.89 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
90	Four (4) Packs of Welding Sticks & A Welding Mask Welding packs, unopened. Undernumber: 14552.90 Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
91	Four (4) Packs of Welding Sticks & A Welding Mask Welding sticks, unopened. Undernumber: 14552.91 Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
92	Four (4) Surveyors Tripods Undernumber: 14552.92 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
93	Two (2) Surveyors Tripods Undernumber: 14552.93 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00



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Lot#	Description	Quantity
94	Large Garage Fan Undernumber: 14552.94 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
95	A Hyster Propane Powered Forklift Items located at secondary location, schedule pick up with Alex Cooper Undernumber: 14552.95 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
96	A Werner 40 foot Fiber Glass Extension Ladder Items located at secondary location, schedule pick up with Alex Cooper Undernumber: 14552.96 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
97	A Werner 40 foot Fiber Glass Extension Ladder Items located at secondary location, schedule pick up with Alex Cooper Undernumber: 14552.97 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
98	A Hyster Battery Powered Forklift Items located at secondary location, schedule pick up with Alex Cooper Undernumber: 14552.98 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
99	A Danville 2033 Scissor Lift Items located at secondary location, schedule pick up with Alex Cooper Undernumber: 14552.99 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
100	About 60 Construction Area Safety Fencing Sections Comes with unknown quantity of metal base connectors. Items located at secondary location, schedule pick up with Alex Cooper Undernumber: 14552.100 Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
101	Four (4) Metal Wheeled Carts Items located at secondary location, schedule pick up with Alex Cooper Undernumber: 14552.101 Condition: All tires in poor condition. Pre-Sale Estimate: 20.00 - 10,000.00	1. 00
102	Metal Gas Can Security Cage Contains numerous metal gas cans. Items located at secondary location, schedule pick up with Alex Cooper Undernumber: 14552.102	1. 00



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Lot#	Description	Quantity
	Pre-Sale Estimate: 20.00 - 10,000.00	
103	Metal Security Cage Items located at secondary location, schedule pick up with Alex Cooper Undernumber: 14552.103 Condition: As is. Pre-Sale Estimate: 20.00 - 10,000.00	1.00
Total Quantity:		105.00

COMMISSION SETTINGS

Calculate Commission By: Each
 Commission Structure Type: Sliding Scale

Up to \$20	\$10
\$20.01 - \$300	35%
\$300.01 - \$1,000	30%
\$1,000.01 - \$2,500	25%
\$2,500.01 - \$10,000	20%
\$10,000.01 - \$100,000	15%
Over \$100,000	10%

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Baltimore Division)**

In re:

*

Case No. 25-11237-NVA

E. E. MARR ERECTORS, INC.,

*

Debtor.

*

* * * * *

**ORDER GRANTING TRUSTEE’S MOTION TO SELL PROPERTY FREE AND
CLEAR OF LIENS, CLAIMS, ENCUMBRANCES AND INTERESTS
(Debtor’s Tools and Equipment)**

Upon consideration of the Trustee’s Motion for Authority to Sell Property Free and Clear of All Liens, Claim, Encumbrances and Interests (the “Motion”), and having found that notice of the Motion was duly given and that no objection to the Motion has been filed, and for good cause shown, it is, by the United States Bankruptcy Court for the District of Maryland,

ORDERED, that, pursuant to 11 U.S.C. § 363(f), the Trustee be and is hereby authorized to sell via an auction the Debtor’s Tools and Equipment, as that term is defined in the Motion, free and clear of all liens, claim, encumbrances and interests on an “as is/where is” basis, with no warranties implied or stated, subject to the conditions set forth in the Motion, which are hereby approved. More specifically, the Debtor’s Tools and Equipment sold to any purchaser at the auction conducted for the Trustee shall be for the price and upon the terms determined at the auction; and it is further

ORDERED, that this Order shall be binding in all respects upon the purchasers of the Debtor's Tools and Equipment, the Trustee, the Debtor, all creditors of the Debtor (known or unknown), and all interested parties, including, but not limited to, any party asserting Interests in the Debtor's Tools and Equipment or the proceeds thereof, and upon the successors and assigns of any of the foregoing; and it is further

ORDERED, that the terms of any sale of the Debtor's Tools and Equipment, document, or other instrument executed or delivered in connection with an auction sale, may be modified, amended, or supplemented by the parties thereto in accordance with the terms thereof, without further order of this Court, provided that any such modification, amendment, or supplement is not material, is consistent with this Order, and has the approval of the parties to each auction sale; and it is further

ORDERED, that except as expressly provided herein, the Debtor's Tools and Equipment shall be transferred to each purchaser upon closing free and clear of all interests pursuant to § 363(f)(5) of the Bankruptcy Code, with the Lienholders' tax liens being subrogated under § 724(b) of the Bankruptcy Code, with all such interests to attach to the proceeds of each sale with the same validity, priority, extent, and effect that such interests had immediately prior to closing, subject to all rights, claims, defenses, and objections of the Trustee, the bankruptcy estate, its creditors, and all interested parties with respect to the interests and the proceeds; and it is further

ORDERED, that, except as expressly provided herein, (i) no purchaser of the Debtor's Tools and Equipment shall be liable for any interests against the Debtor's Tools and Equipment, and (ii) the transfer of the Debtor's Tools and Equipment by the Trustee does not and shall not subject any purchasers to any liability as successor to the Debtor; and it is further

ORDERED, that the sole and exclusive remedy available to any person or entity asserting interests against the Debtor's Tools and Equipment shall be a right to assert in this Court any interests against the sale proceeds, and the holders of any such interests are hereby barred from asserting such interests against the Debtor's Tools and Equipment, the Debtor, the Trustee, the bankruptcy estate, any purchaser, and/or their respective successors and assigns; and it is further

ORDERED, that the sales consummated hereunder shall be binding upon and govern the acts of all persons and entities, including, without limitation, all filing agents, filing officers, title agents, title companies, administrative agencies, governmental departments, secretaries of state, federal and local officials, and all other persons and entities who may be required by operation of law, or duties of office or contract to accept, file, register or otherwise record or release any documents or instruments or who may be required to report or insure any title or state of title in or to any of the property sold pursuant to this Order; and each of the foregoing persons and entities is hereby directed to accept for filing any and all of the documents and instruments necessary and appropriate to consummate the transactions contemplated by the Motion; and it is further

ORDERED, that the Trustee is authorized to disburse from the sale proceeds, directly or through an intermediary, the approved fees and expenses of the Trustee's Auctioneer (as that term is defined in the Motion) all as set forth in the Application to Employ Auctioneer for Trustee (Doc. No. 20); and it is further

ORDERED, that the Trustee be and is hereby authorized to take any and all actions and to execute any and all documents necessary and appropriate to effectuate and consummate the terms of sale of the Debtor's Tools and Equipment; and it is further

ORDERED, that all proceeds of sale not disbursed at the direction of the Trustee as authorized herein shall be turned over to and retained by the Trustee, in escrow, for disbursement in accordance with the Bankruptcy Code and/or further Order of this Court; and it is further

ORDERED, that the stay provided for in Bankruptcy Rule 6004(h) be and is hereby waived and this Order shall be effective immediately upon its entry.

Cc: Craig B. Leavers, Esq. via CM/ECF

Daniel Alan Staeven, Esq. via CM/ECF

Office of the United States Trustee
101 West Lombard Street, Suite 2625
Baltimore, Maryland 21201

E. E. Marr Erectors, Inc.
2039 Hollins Ferry Road
Baltimore, Maryland 21230
(Debtor)

Douglas O'Donnell, Commissioner
Internal Revenue Service
1111 Constitution Avenue, NW
Washington, DC 20224

Erek L. Barron
United States Attorney
for District of Maryland
36 South Charles Street, 4th Floor
Baltimore, Maryland 21021

Renee Nacrelli, Esq.
Assistant Attorney General
Office of the Maryland Attorney General
St. Paul Plaza
200 St. Paul Place
Baltimore, Maryland 21202

Brooke Lierman
Comptroller of Maryland
Goldstein Treasury Building
80 Calvert Street
Annapolis, Maryland 21404-0466

The Honorable Pamela Bondi
Attorney General of the United States
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530

END OF ORDER

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Baltimore Division)**

In re:	*	
		Case No. 25-11237-NVA
E. E. MARR ERECTORS, INC.,	*	
Debtor.	*	
* * * * *	* * * * *	

**NOTICE OF TRUSTEE’S MOTION TO SELL PROPERTY FREE AND
CLEAR OF LIENS, CLAIMS, ENCUMBRANCES AND INTERESTS
(Debtor’s Tools and Equipment)**

NOTICE IS HEREBY GIVEN that Morgan W. Fisher, the Chapter 7 Trustee in the above-captioned case (the “Trustee”), has filed a motion (the “Motion”)¹ for authority to sell via auction the following tools and equipment of the Debtor by auction free and clear of liens, claims, encumbrances and interests: Thirteen (13) Lincoln Electric Ranger Motor Driven Welders; Eleven (11) 11 sets of welding cables (fitted for the above Lincoln welders); Two (2) acetylene tank cars; Two (2) sets of acetylene welding cables; One (1) Millermatic 130 Welding Power Source wire feeder with tank, gauges, and cable; Twenty-seven (27) ladders, ranging from 10’ to 40’ feet in length; Two (2) battery chargers/starters; Assorted tools, including rakes, shovels, and sledge hammers; Large group of power tools, including drills, hammer drills, grinders, and caulk guns; Large number of garage tools, including jack stands, bottle jack, shop vacuum, a creeper, drop light, and a floor jack; One (1) Ryobi 2-cycle gas powered weed whacker; One (1) Power washer with Honda motor, 2200 PSI; Group of welding torches and gauges; Six (6) laser levels; One (1) Ryobi 10” compound miter saw; Ten (10) surveyor/laser level tripods; One (1) electric pallet jack; One (1) Hyster propane powered forklift; One (1) Danville 2033 scissor lift; Approximately sixty (60) construction area safety fencing sections with an unknown quantity of metal base connectors; and numerous metal gas cans (the “Debtor’s Tools and Equipment”).

The Debtor’s Tools and Equipment have not been appraised. The Debtor has scheduled them as having a value of approximately \$115,535.00.

The auction is expected to take place on April 15, 2025, but that is subject to change to a later date. On-line marketing for the auction will occur for three weeks prior to the auction date. The Debtor’s Tools and Equipment will be sold/auctioned on an “as is/where is,” with no warranties implied or stated.

The Trustee’s Auctioneer will receive a twenty percent (20%) seller’s commission. The Trustee’s Auctioneer will also collect from the successful bidder a buyer’s premium of not more

¹ A copy of the Motion and its exhibits can be viewed at <https://www.leaverslaw.com/trustee-cases>.

than eighteen percent (18%). Additionally, the Auctioneer expend between \$1,800.00 to \$2,400.00 to remove the Debtor's Tools and Equipment from the Debtor's leased premises and transport it to and store it at the auction site. Finally, the Auctioneer will be charged a flat fee of \$250.00 and 3% of the sale price of the Debtor's Tools and Equipment for the use of a third-party digital, bidding plat form that allows buyers to place bids, enabling rapid and effective negotiations based on real-time price and volume. The Trustee's Auctioneer seeks to be reimbursed for these actual, necessary expenditures.

NOTICE IS FURTHER GIVEN that if you wish to object to the Motion, you must do so in writing, stating specifically the factual and legal grounds of your objection, and file your written objection by **April 14, 2025**, with the Clerk of the Bankruptcy Court, 101 West Lombard Street, Suite 8530, Baltimore, Maryland 21201. A copy of your written objection must also be mailed to: Craig B. Leavers, Esq., The Law Offices of Craig B. Leavers, LLC, P.O. Box 306, Cockeysville, Maryland 21030. If you mail rather than deliver your objection to the Clerk of the Bankruptcy Court for filing, you must mail it early enough so that the Court will receive it by the date stated above.

NOTICE IS FURTHER GIVEN that if any response or objection is filed, a hearing will be held on the Motion and that objection on **April 22, 2025, at 1:30 p.m.**, in Courtroom 2-A, United States Bankruptcy Court (Baltimore), U.S. Courthouse, 101 West Lombard Street, Baltimore, Maryland 21201. The Court, in its discretion, may conduct a hearing or determine the matter without a hearing regardless of the filing of an objection. If no objections are timely filed, the proposed sale may be conducted in accordance with the terms recited herein, without further notice.

Creditors and other parties-in-interest desiring further information may review the Court files relating to this case, or may contact the undersigned counsel.

Date: March 24, 2025

/s/ Craig B. Leavers
Craig B. Leavers, Bar No. 26914
P.O. Box 306
Cockeysville, Maryland 21030
(443) 318-4526
Craig@LeaversLaw.com

(Attorney for the Trustee)

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the 24th day of March, 2025, a copy of the foregoing was served on the parties listed below by electronic service via CM/ECF:

Daniel Alan Staeven, Esq.
Frost & Associates, LLC
839 Bestgate Road, Suite 400
Annapolis, Maryland 21401
(Attorney for Debtor)

And on the parties listed below by first class mail, postage prepaid:

Office of the United States Trustee
101 West Lombard Street, Suite 2625
Baltimore, Maryland 21201

E. E. Marr Erectors, Inc.
2039 Hollins Ferry Road
Baltimore, Maryland 21230
(Debtor)

Douglas O'Donnell, Commissioner
Internal Revenue Service
1111 Constitution Avenue, NW
Washington, DC 20224

Erek L. Barron
United States Attorney
for District of Maryland
36 South Charles Street, 4th Floor
Baltimore, Maryland 21021

Renee Nacrelli, Esq.
Assistant Attorney General
Office of the Maryland Attorney General
St. Paul Plaza
200 St. Paul Place
Baltimore, Maryland 21202
(Principal Counsel for Comptroller of Maryland)

Brooke Lierman
Comptroller of Maryland
Goldstein Treasury Building
80 Calvert Street
Annapolis, Maryland 21404-0466

Those on the attached creditors matrix

And on the parties listed below by certified mail:²

The Honorable Pamela Bondi
Attorney General of the United States
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530

/s/ Craig B. Leavers
Craig B. Leavers

² Pursuant to Fed. R. Civ. P. 4(i)(1)(B) and the Department of Justice manual 5-5.124, service must be made upon the U.S. Attorney General by certified mail.

Label Matrix for local noticing
0416-1
Case 25-11237
District of Maryland
Baltimore
Wed Feb 26 14:41:02 EST 2025

E.E. Marr Erectors, Inc.
2039 Hollins Ferry Road
Baltimore, MD 21230-1606

AMERICAN EXPRESS
PO BOX 981537
El Paso, TX 79998-1537

Clark Hill PLC
C/O Andrew Giel
301 Grant St Ste 14
Pittsburgh, PA 15219-1408

(p)COMPTROLLER OF MARYLAND
BANKRUPTCY UNIT
7 ST PAUL STREET SUITE 230
BALTIMORE MD 21202-1626

Danny P. Benjamin
1779 Sam Mason Road
Bunker Hill, WV 25413-3437

Darlene A. Earehart
676 D St
Pasadena, MD 21122-4418

Dewight Watson
8602 Tabb Court
Bowie, MD 20720-4444

Dillon Edwards
10130 Hutzell St
Ijamsville, MD 21754-8818

Dionicio A. Fernandez
6833 Dyer Court
Springfield, VA 22150-2007

Edwin Rodriguez
1024 Allen Drive
Winchester, VA 22601-5832

Grace K. Wetzel
10130 Hutzell St
Ijamsville, MD 21754-8818

Gregory T. Payne
212 Henrico Road
Front Royal, VA 22630-4200

Internal Revenue Service
PO Box 7346
Philadelphia, PA 19101-7346

Jane Edwards
17018 Taylors Landing Road
Sharpsburg, MD 21782-1123

Jose Alvarado
8907 Sonnet Hill Court
Richmond, VA 23236-4429

Jose M. Andrade Maltez
883 Clopper Rd Apt. T1
Gaithersburg, MD 20878-4424

Jose O. Rodriguez
55 Milton Ct
Inwood, WV 25428-4374

Jose Rocha
817 S. Glebe Rd
Arlington, VA 22204-2444

Josue N. Guzman
4324 Eileen Court
Woodbridge, VA 22193-2670

Kevin R. Edwards
1324 Commerce Street
Winchester, VA 22601-4410

Kirk Eugene Edwards
12332 Woodsboro Pike
Keymar, MD 21757-8716

MARR HOLDINGS, LLC
2039 Hollings Ferry Road
Baltimore, MD 21230-1606

Manuel D. Rosales
58 Spring Lake Drive
Stafford, VA 22556-6554

Mark R. Williams
12626 Deerfield Drive
Lusby, MD 20657-3345

Maxim Crane Works
PO Box Box 845389
Minneapolis, MN 55485-0001

State of New Jersey
Division of Employer Accounts
Po Box 59
Trenton, NJ 08646-0059

Steve Dupree
6507 Holly Ridge Rd
Rougemont, NC 27572-8977

Wilmer L. Vargas
5704 Hamilton Street
Hyattsville, MD 20781-2930

Daniel Alan Staeven
Frost & Associates, LLC
839 Bestgate Road
Suite 400
Annapolis, MD 21401-3474

Morgan W. Fisher
Law Offices of Morgan Fisher LLC
18 West St
Annapolis, MD 21401-2421

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Comptroller of Maryland
Bankruptcy Unit
301 W Preston St Ste 409
Baltimore, MD 21201-2396

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Marr Holdings, LLC	End of Label Matrix	
	Mailable recipients	30
	Bypassed recipients	1
	Total	31