

DISTRICT COURT, CITY AND COUNTY OF DENVER,
STATE OF COLORADO
1437 Bannock Street
Denver, Colorado 80202

DATE FILED
April 17, 2025 11:18 AM
FILING ID: 175537ABFDA3F
CASE NUMBER: 2024CV30763

Plaintiffs:

ROSS BERMAN, JASON H. KARP, IMJ I LLC, a Delaware limited liability company, RACHEL FARBER REVOCABLE TRUST, STEPHEN FARBER REVOCABLE TRUST, AND RED CLOUD CAPITAL, LLC, a Connecticut limited liability company,

v.

Defendants:

BELLROCK BRANDS INC., a British Columbia corporation, BRB DB HOLDINGS, INC., a Delaware corporation, BRB MARY'S HOLDINGS CORP., a Delaware corporation, DIXIE BRANDS (USA) INC., a Delaware corporation, MARY'S OPERATIONS, LLC, a Colorado limited liability company, MARY'S PETS, LLC, a Colorado limited liability company, MARY'S NUTRITIONALS, LLC, a Colorado limited liability company, DB FINANCE NEVADA, LLC, a Nevada limited liability company, and DB OKLAHOMA, LLC, a Colorado limited liability company.

▲ COURT USE ONLY ▲

Attorneys for Receiver-Manager: West 4th Holdings, LLC:

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Case Number:
2024CV30763

Division/Courtroom: 466

RECEIVER'S UNOPPOSED MOTION TO FILE UNDER SEAL

Receiver, West 4th Holdings, LLC, by and through undersigned counsel, moves pursuant to C.R.C.P 121, § 1-5, for leave to file the billing statements of its attorneys at Allen Vellone Wolf Helfrich & Factor P.C. (“AVWHF”) under “sealed” status. This protection is needed to safeguard the confidentiality of the documents and protect privileged information.

Certificate of Conferral: Pursuant to C.R.C.P. 121 § 1-15(8), undersigned counsel for the Receiver certifies that they have conferred with counsel for Plaintiff - Intervenors who do not oppose the relief sought in this Motion.

Pursuant to C.R.C.P. 121 § 1-5(3) Plaintiff may apply for leave to file documents under seal via motion. Here, there is no public interest in reviewing AVWHF’s billing statements. The Receiver may be harmed by the public revelation of its attorneys billing statements, which include privileged information.

Therefore, the public interest in access to these exhibits is outweighed by concerns for privacy, and the documents should be filed under sealed status and not revealed to the public at any time in these proceedings.

On February 13, 2025, this Court granted Receiver’s oral motion to file AVWHF’s billing statements introduced as an exhibit under seal during a Status Conference held on February 4, 2025.

WHEREFORE, Receiver respectfully requests that the Court allow Receiver to file AVWHF’s billing statements under “sealed” status.

DATED this 17th day of April 2025.

Respectfully submitted,

ALLEN VELLONE WOLF HELFRICH & FACTOR P.C.



By: s/ Bailey C. Pompea

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Attorneys for the Receiver

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 17th day of April 2025, a true and correct copy of the foregoing was filed and served via the Colorado Courts E-Filing system on all counsel of record.

s/ Salowa Khan

Allen Vellone Wolf Helfrich & Factor P.C.

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ORDER GRANTING RECEIVER’S UNOPPOSED MOTION TO FILE UNDER SEAL	

THIS MATTER comes before the Court on Receiver, West 4th Holdings, LLC’s Unopposed Motion to File Under Seal. The Court, having reviewed the Motion and being fully advised of the premises, hereby

ORDERS that the Motion is GRANTED and that Receiver is hereby allowed to file AVWHF’s billing statements under seal.

Dated: _____

BY THE COURT:

 Hon. District Court Judge