



ORSON AND BRUSINI

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2024 MAY 21 AM 11:04

Harmony Conti Bodurtha
(401) 223-2100

hbodurtha@orsonandbrusini.com

May 16, 2024

1735233

TO CREDITORS AND OTHER PARTIES IN INTEREST:

Re: *Diana Proto v. JDT Entertainment, LLC, C.A. No.: PC-2024-02198*

On April 30, 2024, the Rhode Island Superior Court, sitting in Providence County (the "Court"), entered an Order appointing the undersigned as Temporary Receiver of JDT Entertainment, LLC, 25 Broad Street, Pawtucket, RI 02860 ("JDT Entertainment"). A copy of the Order Appointing Temporary Receiver (the "Order") is enclosed.

JDT Entertainment, LLC, is a Restaurant and Lounge which is operated by Diana Proto. Diana Proto is the sole member of JDT Entertainment, LLC.

My law firm does not represent, nor has ever represented, either JDT Entertainment, LLC, or Diana Proto.

As Receiver, I am a fiduciary, appointed to represent the interests of all creditors and other parties in interest. I have been appointed as a neutral and impartial Receiver for the purpose of marketing and selling the assets and business of JDT Entertainment for the highest value, in order to maximize recovery for creditors. I intend to immediately market the assets and business of JDT Entertainment, and I hope to conduct a sale in a very short time frame. You will receive notice of any proposed sale with the date and time for the scheduled sale hearing before the Court.

Preliminarily, it appears that JDT Entertainment has secured debt in the range of \$0, and priority and general unsecured debt in the range of \$35,000.00 - \$40,000.00.

In connection with the Receivership, as set forth in Paragraph 7 of the Order, all creditors are enjoined and stayed from taking any action to enforce their claims against JDT Entertainment, LLC, and/or its assets.

No claims will be approved and no distribution to creditors will take place without prior notice to all creditors and other parties in interest who file a Proof of Claim with the Receiver, after a Hearing thereon before the Rhode Island Superior Court.

In order that your interests are protected, and to ensure that you receive notice of all appropriate court filings in connection with this case, I have enclosed a Proof of Claim form which I suggest that you complete, execute before a Notary Public, and return to my office at the West Warwick address indicated below.

211 Quaker Lane, Suite 201
West Warwick, RI 02893
phone 401-223-2100
fax 401-861-3103

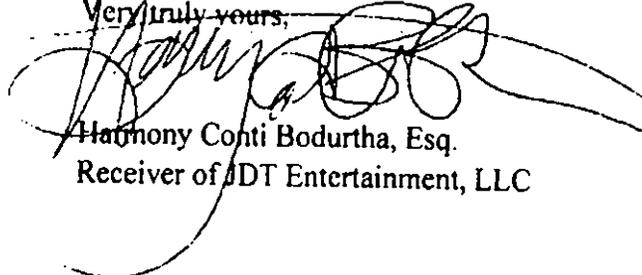
336 Main Street
Wakefield, RI 02879
phone 401-788-9080
fax 401-788-9084

195 Broadway
Newport, RI 02840
phone 401-846-7777
fax 401-848-7141

As indicated in the Order, the Rhode Island Superior Court has scheduled a Hearing on continuation of the undersigned as Permanent Receiver for **9:30 a.m. on May 30, 2024 via Webex**. **Creditors and other interested parties are welcome to attend, but are not required to do so**. If you wish to attend, please email me on or before May 29th at 5:00pm.

If you have any questions regarding any aspect of the foregoing, or if you would like to receive a bid package, please feel to email the undersigned (HBodurtha@orsonandbrusini.com) or to call us at (401) 223-2100.

Very truly yours,



Harmony Conti Bodurtha, Esq.
Receiver of JDT Entertainment, LLC

Enclosures

1. Order Appointing Temporary Receiver
2. Proof of Claim for JDT Entertainment, LLC

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

DIANA PROTO, :
Petitioner :
vs. :

C.A. No.: PC 2024-02198

JDT ENTERTAINMENT, LLC, :
Respondent :

ORDER APPOINTING TEMPORARY RECEIVER

This cause came to be heard on the Petition for the Appointment of Temporary Receiver for the Respondent, JDT Entertainment, LLC, (the "Respondent"), and upon consideration thereof, it is hereby

ORDERED, ADJUDGED AND DECREED:

1. That Harmony Conti Bodurtha, Esquire of Orson and Brusini Ltd., West Warwick, Rhode Island, be and hereby is appointed Temporary Receiver (the "Receiver") of Respondent.

2. That said Receiver shall, no later than five (5) days from the date hereof, file a bond in the sum of \$10,000.00 with any surety company authorized to do business in the State of Rhode Island as surety thereon, conditioned that the Receiver will well and truly perform the duties of said office and duly account for all monies and property which may come into the Receiver hands and abide by and perform all things which the Receiver will be directed to do by this Court.

3. That said the Receiver is authorized to take possession and charge of the property and assets of the Respondent, to collect the debts and property belonging to it and to preserve the same until further order of this Court.

4. That the Receiver is authorized to immediately market the assets and business of the Respondent and may enter into a purchase and sale agreement ~~(s)~~ in order to sell some or all of the assets and business of the Respondents provided that said purchase and sale agreement is conditioned upon higher and/or better offers and court approval after notice and a hearing thereon.

5. That said Receiver is authorized until further Order of this Court, in the Receiver's discretion and as said Receiver deems appropriate and advisable, to conduct the business of said Respondent, to borrow money from time to time, to purchase for cash or upon credit, merchandise, materials and other property, to engage appraisers and/or employees and assistants, clerical or otherwise, and to do and perform or cause to be done and performed all other acts and things as are appropriate in the premises.

6. That, pursuant to and in compliance with Rhode Island Supreme Court Executive Order No. 95-01, this Court finds that the designation of the aforescribed person for appointment as Receiver herein is warranted and required because of the Receiver's specialized expertise and

experience in operating businesses in receivership and in administering non-routine receiverships which involve unusual or complex legal, financial, or business issues.

7. Except as provided in paragraph 8 below, that the commencement, prosecution, or continuance of the prosecution, of any action, suit, arbitration proceeding, hearing, or any foreclosure, reclamation or repossession proceeding, both judicial and non-judicial, or any other proceeding, in law, or in equity or under any statute, or otherwise, against said Respondent or any of its property, in any Court, agency, tribunal, or elsewhere, or before any arbitrator, or otherwise by any creditor, stockholder, corporation, partnership or any other person, or the levy of any attachment, execution or other process upon or against any property of said Respondent, or the taking or attempting to take into possession any property in the possession of the Respondent or of which the Respondent has the right to possession, or the cancellation at any time during the Receivership proceeding herein of any insurance policy, lease or other contract with Respondent, by any of such parties as aforesaid, other than the Receiver designated as aforesaid, or the termination of telephone, electric, gas or other utility service to Respondent, by any public utility, without prior approval thereof from this Honorable Court, in which connection said Receiver shall be entitled to prior notice and an opportunity to be heard, are hereby restrained and enjoined until further Order of this Court.

8. The foregoing paragraph does not stay the exercise of rights of a party to a swap agreement, securities contract, repurchase agreement, commodity contract, forward contract or master netting agreement, as those terms are defined in the federal Bankruptcy Code, to the extent that a court would not have the power to stay the exercise if Respondent were a debtor under the Bankruptcy Code.

9. That a Citation be issued to said Respondent, returnable to the Superior Court sitting at Providence, Rhode Island on May 30, 2024 at 9:30 a.m., remotely via Webex, at which time and place this cause is set down for Hearing on the prayer for the Appointment of a Permanent Receiver; that the Clerk of this Court shall give Notice of the pendency of the Petition herein by publishing the annexed Receivership Notice once in The Providence Journal on or before May 16, 2024, so long as the Receiver's Bond has been filed, and the Receiver shall give further notice by mailing, on or before May 16, 2024, a copy of said Order Appointing Temporary Receiver to each of the Respondent's creditors, stockholders and/or members whose address is known, or may become known, to the Receiver.

10. This Order is entered by virtue of and pursuant to this Court's equity powers and pursuant to its powers as authorized by the laws and statutes of the State of Rhode Island.

ENTERED as an Order of this Court this 30th day of April, 2024.

BY ORDER:

Brian P. Stern, J.
Associate Justice
April 30, 2024

ENTER:

/s/ Carin Miley
Deputy Clerk I
Clerk, Superior Court
April 30, 2024