UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

HELLO FARMS LICENSING MI LLC,
a Michigan limited liability company,

Plaintiff/Counter-Defendant,

vs.

GR VENDING MI, LLC, a
Michigan limited liability company, and
CURA MI, LLC,
a Michigan limited liability company,

Defendants/Counter-Plaintiffs.

Case No. 21-10499
Hon. Matthew F. Leitman
Mag. Patricia T. Morris

JUDGMENT CREDITOR, HELLO FARMS'S MOTION TO COMPEL PRODUCTION OF DOCUMENTS FROM JUDGMENT DEBTORS

I. Introduction

The Court awarded Plaintiff, Judgment-Creditor Hello Farms Licensing MI, LLC ("Hello Farms") a $37 Million judgment (the "Judgment"). That Judgment followed a long jury trial and is now nearly $38 Million based on post-Judgment interest accrual.

Plaintiff has *barely* issued discovery despite the size of the Judgment. Yet, in response to this discovery, Defendant-Judgment Debtors, GR Vending MI, LLC and CURA MI, LLC (the "Judgment Debtors") have served improper responses to interrogatories and requests for production riddled with boilerplate objections along

with an incomplete production.

Plaintiff is entitled to discover the Judgment Debtors' assets. The Court should compel Judgment Debtors' complete responses to post-judgment discovery.

II. Statement of Facts

On May 6, 2025, the Court awarded Hello Farms a $37 Million Judgment. ECF No. 295.

On August 5, 2025, Plaintiff issued written post-Judgment discovery to Defendant Judgment Debtors. *See* Transmission Email at ECF No. 330-2, PageID.15813, and **Exhibit A**, Hello Farms's First Set of Post Judgment Discovery Requests to Judgment Debtors. Hello Farms's discovery requests principally propounded interrogatories and requests for production requesting asset discovery including but not limited to requests that the Judgment Debtors identify (1) each payment made to Honigman LLP regarding work related to this lawsuit, (2) each financial institution Judgment Debtors ever had an account, and (3) all assets that could satisfy the Judgment, just to name a few, and documents evidencing the same. *See* **Exhibit A**.

On September 4, 2025, Judgment Debtors served their written responses which included the following boilerplate objections:

> Each of Defendants' responses to Plaintiff's Requests is subject to and incorporates the following General Objections, whether or not specifically referred to in an individual response.

1. Defendants object to the Requests to the extent they are not tailored to further the goals of post-judgment discovery—namely, ascertaining the location of Defendants' current assets for purposes of satisfying the judgment.

2. Discovery and investigation of facts relevant to this litigation are ongoing. Defendants' responses herein are given without prejudice to their right to amend or supplement in accordance with Federal Rules of Civil Procedure 26 and 33, any case schedule that is adopted by the Court in this litigation, or any other schedule or ruling that may be entered by the Court.

3. Defendants object to the Requests, and the "Definitions" and "Instructions" related thereto, to the extent that they are inconsistent with or seek to impose requirements or obligations on Defendants beyond those required by the Federal Rules of Civil Procedure, any case schedule that is adopted by the Court in this litigation, or any other schedule or ruling that may be entered by the Court.

4. Defendants object to the Requests to the extent that: (a) they are unreasonably cumulative or duplicative; (b) they seek information that is obtainable from some other source that is more convenient, less burdensome, or less expensive; (c) the burden or expense of the proposed discovery outweighs any likely benefit; (d) they seek information not relevant to any party's claim or defense; and (e) they are not proportional to the needs of the case.

5. Defendants object to the Requests to the extent that they contain multiple unrelated subparts.

6. Defendants object to the Definitions and Instructions generally, and to each Request specifically, as seeking information protected from discovery by the attorney/client privilege, the work-product doctrine, the common-interest doctrine, and/or other applicable privileges, immunities, and protections. Nothing contained in Defendants' responses is intended to be, or in any way shall be deemed, a waiver of any such applicable privilege or doctrine.

7. Defendants object to each Request to the extent that it seeks information that constitutes the confidential information of third

> parties. Defendants will provide such information only subject to the approval of those third parties or pursuant to a Court Order.
>
> 8. Defendants object to each Request to the extent that it seeks information not in the possession, custody or control of Defendants, or not kept in the ordinary course of Defendants' business.
>
> 9. Defendants object to each Request to the extent that it is not limited by any time period. Defendants will limit their response to a reasonable time period applicable to each Request.
>
> 10. No waiver of the above-stated objections shall be implied from the inclusion of further or more specific objections in individual responses below.
>
> 11. Defendants are willing to meet and confer on any of their objections to assist Plaintiff in clarifying or narrowing the scope of the requested discovery.
>
> 12. Any documents produced in response to these Requests are subject to the Protective Order previously entered in this case. See ECF No. 37.

Exhibit B, pg. 2-4. As explained herein, boilerplate objections should be ignored and constitute a waiver of the objections.

Further, in response to 23 of the 33 discovery requests, Judgment Debtors included a copy and paste of the following objection: "Defendants object to this Request because it is overbroad, unduly burdensome, and requests information not relevant to any parties' claims or defenses." **Exhibit B**, Responses to Interrogatories Nos. 1, 2, 3, 4, 7, 8, 10, 11, 12; and Responses to Requests for Production Nos. 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14.

In response to 6 requests for production, Judgment Debtors wrote: "Subject

to these objections, Defendants state that they will conduct a reasonable search for and produce documents in their possession, custody, or control sufficient to show the debts owed Defendants, if any." **Exhibit B**, Responses to Requests for Production Nos. 4, 5, 6, 7, 8, 14.

Furthermore, Judgment Debtors did not produce one document until September 12, 2025. And even then, the September 12 production was obviously incomplete. It only included 170 documents in total.

- It contained none of the "source documents" that the witness in the creditor's examination testified he needed to answer questions.
- It also did not contain any documents showing the actual activity in the limited bank statements provided, which activity again the witness testified he reviewed before testifying.
- It also did not contain the annual income statements or balance sheets that the witness testified he reviewed.
- It also did not contain the source data on which the balance sheet that was produced supposedly relied.
- The production did not include any documents depicting the alleged $20 Million (and often greater amounts and lesser amounts) "intercompany receivable."

- It also did not contain tax information that the witness reviewed before testifying.

In sum total, the production consisted of 36 "account statements" for GR Vending MI LLC (CURA004790-5077), 126 Dart Bank statements for GR Vending MI LLC (CURA005078-6167), and 8 Cannabis Regulatory Agency forms titled "Request to Close Marijuana License" (CURA006168-6175).

Defendants failed to produce ***any*** Cura MI LLC documents.

Judgment Debtors should be compelled to serve complete responses to these discovery requests, including serving complete production of documents.

III. Standard of Review

A judgment creditor is entitled to "a very thorough examination of the judgment debtor." *Credit Lyonnais, S.A. v. SGC Int'l, Inc.*, 160 F.3d 428, 430–31 (8th Cir. 1998) (quoting *Caisson Corp. v. County West Bldg. Corp.*, 62 F.R.D. 331, 335 (E.D. Pa.1974)), and "the presumption should be in favor of full discovery of any matters *arguably* related to the [creditor's] efforts to trace [the debtor's] assets and otherwise to enforce the judgment." *Id.* (emphasis added); *see also Comerica Bank v. Esshaki*, 314 F. Supp. 3d 832, 833 (E.D. Mich. 2018).

In *Comerica Bank,* a Magistrate in this Court reiterated that "the scope of postjudgment discovery is very broad." *Id.* (citing *United States v. Conces*, 507 F.3d 1028, 1040 (6th Cir. 2007) (quoting *F.D.I.C. v. LeGrand*, 43 F.3d 163, 172 (5th Cir.

1995)).

Hello Farms is entitled to such breadth of post Judgment discovery and to proceed under Rule 69(a)(2) which provides that a judgment creditor "may obtain discovery from any person-including the judgment debtor-as provided in these rules or by the procedure of the state where the court is located."

Rule 37(a) also entitles Hello Farms to sanctions. The burden to resist discovery particularly at this stage, is heavy and lies with Defendants. "The burden . . . rests with the party objecting to the motion to compel to show in what respects the discovery requests are improper." *Strategic Mktg. & Rsch. Team, Inc. v. Auto Data Sols., Inc.*, 2017 WL 1196361, at *2 (E.D. Mich. Mar. 31, 2017) (internal citations omitted).

IV. Argument

It is, of course, a "basic proposition that all orders and judgments of courts must be complied with promptly." *Maness v. Meyers*, 419 U.S. 449, 458 (1975). Parties cannot simply ignore orders of the Court. *See Elec. Workers Pension Trust Fund v. Gary's Elec. Servs.*, 340 F.3d 373, 379 (6th Cir. 2003).

"A judgment creditor can use the 'full panoply' of discovery measures available, 'including information about assets on which execution can issue or about assets that have been fraudulently transferred.'" *Hardy Indus. Techs., LLC*, at *2 (citing *Lucas*, 2016 WL 5844300, at *3 (citations omitted)).

If a party fails to respond to discovery, including if that party's discovery response is evasive or incomplete, the requesting party may move for an order compelling discovery. Fed. R. Civ. P. 37(a)(1)–(4). If an objection is lodged, the objecting party must "state whether any responsive materials are being withheld on the basis of that objection," and "[a]n objection to part of a request must specify the part and permit inspection of the rest." Fed. R. Civ. P. 34(b)(2)(C).

"Boilerplate or generalized objections are tantamount to no objection at all and will not be considered by the Court." *Strategic Mktg. & Rsch. Team, Inc. v. Auto Data Sols., Inc.*, 2017 WL 1196361, at *2 (E.D. Mich. Mar. 31, 2017); *see also*, *Siser N. Am., Inc. v. Herika G. Inc.*, 325 F.R.D. 200, 209–10 (E.D. Mich. 2018) ("Boilerplate objections are legally meaningless and amount to a waiver of an objection.").

A. Judgment Debtors Should Serve Complete Written Responses to Discovery Requests without Boilerplate or otherwise Improper Objections.

On September 4, 2025, Judgment Debtors served incomplete and improper responses to Hello Farms's August 5th discovery requests, which included boilerplate objections and was accompanied by a late and incomplete document production served on September 12, 2025.

Here, the first three pages of Judgment Debtors' responses consisted of improper boilerplate objections, which should be ignored. *See* **Exhibit B**, pg. 2-4.

Boilerplate objections should be ignored and constitute a waiver of the objections. *See Strategic Mktg,* 2017 WL 1196361, at *2; *see also*, *Siser N. Am., Inc,* 325 F.R.D. at 209–10 ("Boilerplate objections are legally meaningless and amount to a waiver of an objection.").

None—*zero*—analysis is offered for the boilerplate objections. They are properly ignored.

Additionally, in response to 6 requests for production, Judgment Debtors wrote: "Subject to these objections, Defendants state that they will conduct a reasonable search for and produce documents in their possession, custody, or control sufficient to show the debts owed Defendants, if any." **Exhibit B**, Responses to Requests for Production Nos. 4, 5, 6, 7, 8, 14. This is also an improper objection. There is no basis to in the undetermined "future" conduct a search and make a production. The answers and documents are past due.

As this Court explained in *J.S.T. Corp. v. Robert Bosch LLC*, 2019 WL 1857014, at *5 (E.D. Mich. Apr. 23, 2019), *report and recommendation adopted*, 2019 WL 1789674 (E.D. Mich. Apr. 24, 2019):

> With respect to Bosch's objections to JST's Interrogatories (i.e., "[s]ubject to the foregoing objections [sic] general and specific objections, Defendant will respond to this interrogatory on a reasonable date to be agreed upon by counsel" and "Plaintiff has not yet filed an answer to the counterclaims"), Bosch has provided no legal basis to support such objections. Bosch's objections are thus without merit. Because Fed. R. Civ. P 33(b)(1)(2) dictates that a party must respond to an interrogatory within 30 days of service, absent an agreement by

the parties, there is no legal basis for Bosch's delay in responding to discovery.

Hello Farms is entitled to complete responses to its post judgment discovery requests without improper objections and without delay. It thus requests this Court enter an order finding that the objections are waived as boilerplate and compelling fulsome production and substantive responses to each of the requests.

B. Judgment Debtor Must Serve a Complete Production of Documents.

Hello Farms's First Set of Post Judgment Discovery Requests, served *to Judgment Debtors* on August 5, 2025, principally propounded interrogatories and requests for production requesting asset discovery including but not limited to requests that Judgment Debtors identify (1) each payment made to Honigman LLP regarding work related to this lawsuit, (2) each financial institution Judgment Debtors ever had an account, and (3) information that would tend to identify assets that could satisfy the Judgment. *See* **Exhibit A**.

On September 4, 2025, Judgment Debtors served their written responses, (*See* **Exhibit B**), but did not produce any "source" documents showing payment of legal expenses. Defendants also did not provide any documents showing the existence of any current or former business, none. Defendants also produced only "financial statements," consisting of two "consolidated" balance sheets that the Chief Accounting Officer testified he could not verify.

The produced contained no "source documents" that the witness in the creditor's examination testified he needed to answer questions. The production included no underlying documents showing the actual activity in the limited bank statements provided, which activity again the witness testified he reviewed before testifying. It also did not contain the annual income statements or balance sheets that the witness testified he reviewed. The production did not include any documents depicting the alleged $20 Million (and often greater amounts and lesser amounts) "intercompany receivable." It also did not contain tax information that the witness reviewed before testifying.

Defendants produced *no bank statements* or documents of any kind related to Cura MI LLC, other than the one consolidated balance sheet that the witness admitted he could not testify was accurate, or that he reviewed the information that was used to generate that document. The grand total 170 documents included were simply 36 account statements for GR Vending MI LLC, and a limited number of Dart Bank statements for GR Vending MI LLC, and 8 Cannabis Regulatory Agency forms titled "Request to Close Marijuana License." This production is what you might see in 1995 in a $50,000 breach of note case.

Hello Farms's requests entry of an Order requiring production by the Judgment Debtors including all invoices and bills sent to Judgment Debtors in this lawsuit. **Exhibit A**, Request for Production 1, at pg. 11. Those are Judgment

Debtors' records, and they would show where Judgment Debtors' money and assets were transfered, including but not limited to inappropriate and unauthorized transfers.

Courts have ordered production of such information and that information fits both the facts of this case and the *broad* intent of post Judgment discovery. *See Allstate Ins. Co. v. Mercyland Health Servs., PLLC*, 2021 WL 1406878, at *9 (E.D. Mich. Feb. 12, 2021) (requiring examinations of the lawyers themselves and production from the lawyers); *Echols v. CARite of Kalamazoo*, 2018 WL 7254692, at *2 (W.D. Mich. Oct. 26, 2018) ("the Court has broad authority to issue orders relating to collection of a money judgment.") (citing *Rogers v. Webster*, 779 F.2d 52 (6th Cir. 1985) ("Michigan has given its courts extremely broad authorization to aid execution on their judgments[.]")); *King v. Curtis*, 2018 WL 8369467, at *2 (W.D. Mich. June 25, 2018); *Glob. Material Techs., Inc. v. Dahzeng Metal Fibre Co.*, 2019 WL 2073956, at *2 (E.D. Mich. May 10, 2019) ("Courts interpreting Michigan law have endorsed a broad scope for post-judgment discovery.") (citing *Comerica Bank*, 314 F. Supp. 3d at 833–34) ("The scope of postjudgment discovery is very broad . . ."). "A judgment creditor is entitled to a very thorough examination of the judgment debtor . . . [t]here is a presumption in favor of full discovery of any matters arguably related to the creditor's efforts to trace the debtor's assets and otherwise to enforce the judgment." *Comerica Bank*, 314 F. Supp. 3d at 834 (cleaned up); *O.J.*

Distributing, Inc. v. Hornell Brewing Co., Inc., 2012 WL 4757940, *2 (E.D. Mich. 2012) (judgment creditor entitled "to obtain information from parties and non-parties alike, including information about . . . assets that have been fraudulently transferred.").

Judgment Debtors failed to produce one document responsive to this request. Request for Production No. 2 requested all documents in support of Judgment Debtors' answers to interrogatories 1 through 7, including but not limited to wire transfer information, receipts of credit card payments, copies of checks, copies of money orders, Quickbook records, and other reports internal to Judgment Debtors showing this information. **Exhibit A**, Request for Production 2, at pg. 11. Judgment Debtors failed to produce any wire transfer information, receipts, copies of checks or money orders.

Request for Production No. 3 sought all copies of cancelled checks or other payment records submitted by Judgment Debtors to Honigman LLP for payment in this lawsuit. **Exhibit A**, Request for Production 3, at pg. 12. Again, not one responsive document was produced. Hello Farms has the right to follow the money trail.

Request for Production No. 4 requested all tax returns from 2020 to present or portions of returns relating to the Judgment Debtors. **Exhibit A**, Request for Production 4, at pg. 12. Judgment Debtors failed to produce any tax returns, *yet their*

witness testified he reviewed those to prepare to testify.

Request for Production No. 5 requested all bank statements since November 1, 2020. **Exhibit A**, Request for Production 5, at pg. 12. It is highly unusual that Judgment Debtors collectively only have 126 Dart Bank statements since November 2020. Bank statements are easily within the scope of discovery and not difficult to produce and supplement.

Request for Production No. 6 sought all financial statements. **Exhibit A**, Request for Production 6, at pg. 12. Only two documents were produced in response to this request. That is woefully inadequate for companies that signed a $50 Million contract and have another $20 Million of "intercompany" loans.

Request for Production No. 7 requests copies of all contracts relating to the sale of substantially all assets associated with Judgment Debtors' current or former cannabis licenses. **Exhibit A**, Request for Production 7, at pg. 12. Not one contract was produced in response to this request. The fact that the assets could have been fraudulently transferred for less than reasonably equivalent value (particularly where these companies supposedly were once valued on paper for tens of millions of dollars) is something the Court already identified. Ordering production in this respect is warranted.

Request for Production No. 8 sought all notes, deeds, title certificates, mortgages, or security instruments of any kind showing debts owed to Judgment

Debtors or property personally owned by Judgment Debtors or property in which Judgment Debtors have a security interest. **Exhibit A**, Request for Production 8, at pg. 13. There were zero documents produced responsive to this request, and yet no interrogatory responses affirming there are no such assets.

Request for Production No. 9 requests all documents and records showing ownership of any asset in which Judgment Debtors ever held an interest. **Exhibit A**, Request for Production 9, at pg. 13. Judgment Debtors failed to produce any responsive documents. Again, given the size of the Judgment and the alleged value of the companies, Hello Farms is easily entitled to this information, including but not limited to executing any fraudulent transfer claim. Curaleaf and the Judgment Debtors are not going to pursue such a claim. Hello Farms is entitled to know where the assets have disappeared. That is a claim and an asset on to itself.

Request for Production No. 10 requests copies of all corporate meetings ever held by Judgment Debtors. **Exhibit A**, Request for Production 10, at pg. 13. Not one responsive document was produced. Those documents would easily likewise corroborate to where the assets were transferred, why, for what value.

Requests for Production Nos. 11 and 12 sought documents showing reimbursements paid by Judgment Debtors to other individuals or entities who advanced costs as well as documents showing income earned by the Judgment Debtors. **Exhibit A**, Requests for Production 11-12, at pg. 13. Again, no responsive

documents have been produced. Again, at the end of 2020, ***the very month the contract was breached***, Debtors on paper had $28 Million in assets. ECF No. 334, PageID.15990, line 23. Where did the value go?

The witness was asked the unremarkable question of whether the "intercompany receivable" includes a promissory note. His response: "I don't know if there is a papered intercompany note. Those balance move monthly." ECF No 15986, lines 16–18. He went on to testify that those "moves" are for "payroll or rents, so when those payments are made, 'we' would – that's how the intercompany gets generated, is what I'm trying to say. If Curaleaf would pay payroll on their behalf, that intercompany loan would be there for payroll." *Id.* at lines 19–23.

There are documents to substantiate or disprove this testimony. There is no reason Hello Farms is not entitled to that information and those records.

Request for Production No. 13 requests copies of all contracts signed by Judgment Debtors. **Exhibit A**, Request for Production 13, at pg. 13-14. Judgment Debtors failed to produce one contract, including the contract that was breached in this case. Lastly, Request for Production No. 14 requests copies of all books and records for Judgment Debtors showing all transactions and business. **Exhibit A**, Request for Production 14, at pg. 14. Judgment Debtors failed to produce any documents responsive to this request. For all of the same reasons, Hello Farms is entitled to "broad" discovery including into "any matters arguably related to the

creditor's efforts to trace the debtor's assets and otherwise to enforce the judgment." *Comerica Bank*, 314 F. Supp. 3d at 834 (internal quotation marks omitted).

Judgment Debtors have not paid a cent toward the $37 Million Judgment. They even intentionally concealed $312,000 received back in June 2025. ECF No. 334, PageID.15931, lines 14–25, PageID.15932, lines 9–14, and PageID.15936, line 13.

Hello Farms is waiting for defense counsel and their clients to stop "stonewalling" and obfuscating meaningful post judgment discovery.

V. Conclusion

WHEREFORE, Hello Farms requests that this Court enter an Order compelling complete written responses without boilerplate and improper objections as well as a complete production in response to Hello Farms's First Post-Judgment Discovery Requests to Judgment Debtors dated August 5, 2025 within 3 days.

Respectfully Submitted,

/s/ *Patrick C. Lannen*

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DATED: October 16, 2025

Proof of Service

The undersigned certifies that on October 16, 2025 a copy of the foregoing document was served upon the attorney(s) of record in this matter at their stated business address as disclosed by the records herein via:

☐ Hand delivery	☐ Overnight mail
☐ U.S. Mail	☐ Facsimile
☐ Email	☒ Electronic Filing System

I declare under the penalty of perjury that the foregoing statement is true to the best of my information, knowledge and belief.

/s/ Patrick Lannen

Patrick Lannen