



**BASTAMRON**  
ATTORNEYS

DL-1387-EL-025

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May 19, 2022

DANA R. QUICK, ESQ.  
EMAIL: [dquick@bastamron.com](mailto:dquick@bastamron.com)

**Via U.S. First Class**

Barbara J. Cote  
Public Utilities Commission of Ohio  
Rates & Analysis Department  
Grid Modernization and Retail Markets  
180 East Broad Street  
Columbus, Ohio 43215

**Re: Liberty Power Delaware, LLC**

To whom it may concern:

I represent Phil von Kahle as assignee of Liberty Power Corp. ("LPC"), which is in an Assignment for the Benefit of Creditors currently pending in the Broward County Circuit Court in the 17<sup>th</sup> Judicial Circuit of Florida, Case No. CACE-21-010056. Liberty Power Delaware, LLC ("LPD") is a wholly owned subsidiary of LPC. As LPC is in a liquidation proceeding, it has no further use for or interest in maintaining eligibility to operate in the State of Ohio. To this end, the Assignee has abandoned LPD's interest in the license issued by Ohio. A copy of the Notice of Assignment and Notice of Abandonment is attached here. Further, to your request for quarterly marketing reports for 2021 and 2022, it is the Assignee's understanding that LPD has never served customers in Ohio.

I trust this information is sufficient to close this matter. If you have any questions, please feel free to contact me directly.

Sincerely,

/s/ Dana R. Quick

Dana R. Quick, Esq.

Enclosures

cc: Philip von Kahle, Assignee

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**IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT,  
IN AND FOR BROWARD COUNTY, FLORIDA**

In re: COMPLEX CIVIL DIV.  
ASSIGNMENT FOR THE BENEFIT OF CREDITORS OF Case No. CACE-21-010056

LIBERTY POWER CORP., LLC,

Assignor,

To: PHILIP J. VON KAHLE,

Assignee.

**ASSIGNEE'S NOTICE OF ABANDONMENT**

Philip J. von Kahle, Assignee ("Assignee"), by and through undersigned counsel, hereby files this Notice of Abandonment pursuant to Florida Statute, Sections 727.108(11), and states as follows:

1. On May 19, 2021, Assignee commenced this Assignment for the Benefit of Creditors proceeding, pursuant to Florida Statute, Chapter 727. A copy of the Assignment was attached to the Petition.

2. The Assignor is a company engaged in the business of providing electricity as a retail provider in numerous states within the USA, with its principal place of business located at 2100 West Cypress Creek Road, Suite 130, Fort Lauderdale, FL 33309.

3. Assignee has since determined that if Assignee was to continue to administer the assets being abandoned for the benefit of creditors, it would only serve to increase administrative expenses and unnecessarily add a burden to the assignment estate for the potential small return these assets could yield upon their liquidation, if any.

4. Accordingly, pursuant to Fla. Stat., § 727.108(11) and based upon his business judgment and the circumstances of this case, effective immediately the Assignee abandons the License No. 06-1387-EL-CRS, State of Ohio Competitive Retail Electric Service Provider Certificate 07-136E held in the name of Liberty Power Delaware LLC.

5. The abandonment does not include any furniture, fixtures, or equipment, books and records of Assignor, or any and all insurance claims and causes of action, or other intangible property, cash or cash equivalents assigned to or vesting in Assignee.

Dated: May 19, 2022

Respectfully submitted,

BAST AMRON LLP  
*Attorneys for Assignee*  
One Southeast Third Avenue, Suite 1400  
Miami, FL 33131  
Telephone: 305.379.7904  
Facsimile: 305.379.7905  
Email: [jbast@bastamron.com](mailto:jbast@bastamron.com)  
Email: [dquick@bastamron.com](mailto:dquick@bastamron.com)

By: /s/ Dana R. Quick

Jeffrey P. Bast, Esq. (FBN 996343)  
Dana R. Quick, Esq. (FBN 0074402)

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Notice has been sent, by email this May 19, 2022 to: Barbara J. Cote, Public Utilities Commission of Ohio, Rates & Analysis Department, Grid Modernization and Retail Markets, e-mail: [Barbara.Cote@puco.ohio.gov](mailto:Barbara.Cote@puco.ohio.gov).

/s/ Dana R. Quick

Dana R. Quick, Esq.

**IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT,  
IN AND FOR BROWARD COUNTY, FLORIDA**

In re:

COMPLEX LITIGATION DIV.

ASSIGNMENT FOR THE BENEFIT OF  
CREDITORS OF

Case No. CACE-21-010056

LIBERTY POWER CORP., LLC,

Assignor,

To: PHILIP J. VON KAHLE,

Assignee.

**NOTICE OF ASSIGNMENT FOR THE BENEFIT OF CREDITORS**

**TO: ALL CREDITORS AND OTHER INTERESTED  
PARTIES**

**PLEASE TAKE NOTICE THAT:**

1. On May 19, 2021, a petition was filed commencing an Assignment for the Benefit of Creditors proceeding, pursuant to Chapter 727 of the Florida Statutes, made by Liberty Power Corp., LLC (the "Assignor"), with its principal place of business at 2100 West Cypress Creek Road, Suite 130, Fort Lauderdale, FL 33309 to Philip J. Von Kahle (the "Assignee"), whose address is 1883 Marina Mile Blvd., Suite 106, Fort Lauderdale, Florida 33315.

2. Pursuant to Florida Statutes, Section 727.105, no proceeding may be commenced against the Assignee except as provided in Chapter 727 and except in the case of a perfected, secured creditor enforcing its rights and collateral under Chapter 679, there shall be no levy, execution, attachment, or the like in the respect of any judgment against assets of the estate, other than real property, in the possession, custody, or control of the Assignee.

3. YOU ARE HEREBY further notified that in order to receive any dividend in the above-captioned proceeding, you must file the enclosed proof of claim with the Assignee, Philip J. Von Kahle, of Michael Moecker & Associates, Inc., whose address is 1883 Marina Mile Blvd., Suite 106, Fort Lauderdale, Florida 33315, so as to be received **September 16, 2021** (120 days from the date of the filing of the Petition).

Dated: May 21, 2021

Respectfully submitted,

BAST AMRON LLP  
*Proposed Attorneys for Assignee*  
SunTrust International Center  
One Southeast Third Avenue, Suite 1400  
Miami, FL 33131  
Telephone: 305.379.7904  
Facsimile: 305.379.7905  
Email: [jbast@bastamron.com](mailto:jbast@bastamron.com)  
Email: [dquick@bastamron.com](mailto:dquick@bastamron.com)

By: /s/ Dana R. Quick  
Jeffrey P. Bast, Esq. (FBN 996343)  
Dana R. Quick, Esq. (FBN 0074402)

**IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT,  
IN AND FOR BROWARD COUNTY, FLORIDA**

**In Re:**

**LIBERTY POWER CORP., LLC**

**Assignor,**

**Case No.: CACE-21-010056**

**To:**

**PHILIP J. VON KAHLE,**

**Assignee,**

**PROOF OF CLAIM**

TO RECEIVE ANY DIVIDEND IN THIS PROCEEDING, YOU MUST COMPLETE THIS PROOF OF CLAIM AND  
DELIVER IT TO THE ASSIGNEE NO LATER THAN:

**SEPTEMBER 16, 2021**

THE ASSIGNEE'S NAME AND ADDRESS ARE AS FOLLOWS:

Philip J. Von Kahle, Assignee  
MICHAEL MOECKER & ASSOCIATES, INC.  
1883 Marina Mile Blvd., Suite 106  
Fort Lauderdale, FL 33315  
(954) 252-1560 • (954) 252-2791 Fax No.  
Info@Moecker.com

1. **CREDITOR NAME (Your name):** \_\_\_\_\_  
**ADDRESS:** \_\_\_\_\_

**TELEPHONE NUMBER:** \_\_\_\_\_  
**E-MAIL ADDRESS:** \_\_\_\_\_

*Please be sure to notify us if you have a change of address.*

2. **BASIS FOR CLAIM:**

<input type="checkbox"/> Goods Sold	<input type="checkbox"/> Wages, Salaries and Compensations	<input type="checkbox"/> Secured Creditor
<input type="checkbox"/> Services Performed	<input type="checkbox"/> Taxes	
<input type="checkbox"/> Money Loaned	<input type="checkbox"/> Customer Deposit	
<input type="checkbox"/> Shareholder	<input type="checkbox"/> Other: _____	

3. **DATE DEBT WAS INCURRED:** \_\_\_\_\_

4. **AMOUNT OF CLAIM:** \_\_\_\_\_

5. **SUPPORTING DOCUMENTS:** Attach copies of supporting documents, such as promissory notes, purchase order, invoices, itemized statement of running accounts, court judgments, or evidence of security interests. If the documents are not available, explain. If the documents are voluminous, attach a summary.

6. **SIGNATURE:** Sign and print name and title, if any, of the creditor or other person authorized to file this claim:

**DATED:** \_\_\_\_\_

**BY:** \_\_\_\_\_  
Signature of Claimant or Representative

\_\_\_\_\_  
Print Name and Title Here