

Fill in this information to identify your case:

United States Bankruptcy Court for the:

DISTRICT OF DELAWARE

Case number (if known) _____ Chapter 11

Check if this an amended filing

Official Form 201

Voluntary Petition for Non-Individuals Filing for Bankruptcy

4/16

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1. Debtor's name Pursuit Holdings (NY), LLC f/k/a Pursuit Holdings, LLC

2. All other names debtor used in the last 8 years
 Include any assumed names, trade names and doing business as names
FKA Pursuit Holdings, LLC

3. Debtor's federal Employer Identification Number (EIN) 68-0603651

4. Debtor's address	Principal place of business	Mailing address, if different from principal place of business
	<u>28 Old Rudnick Lane</u> Dover, DE 19901 Number, Street, City, State & ZIP Code	<u>23 Mckinley Road</u> Montauk, NY 11954 P.O. Box, Number, Street, City, State & ZIP Code
	<u>Kent</u> County	Location of principal assets, if different from principal place of business <u>10 Bedford Street, New York, NY 10014</u> Number, Street, City, State & ZIP Code

5. Debtor's website (URL) _____

6. Type of debtor
 Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))
 Partnership (excluding LLP)
 Other. Specify: _____

Debtor Pursuit Holdings (NY), LLC f/k/a Pursuit Holdings, LLC
Name

Case number (if known) _____

7. Describe debtor's business

A. Check one:

- Health Care Business (as defined in 11 U.S.C. § 101(27A))
- Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
- Railroad (as defined in 11 U.S.C. § 101(44))
- Stockbroker (as defined in 11 U.S.C. § 101(53A))
- Commodity Broker (as defined in 11 U.S.C. § 101(6))
- Clearing Bank (as defined in 11 U.S.C. § 781(3))
- None of the above

B. Check all that apply

- Tax-exempt entity (as described in 26 U.S.C. §501)
- Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. §80a-3)
- Investment advisor (as defined in 15 U.S.C. §80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor.
See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.

8. Under which chapter of the Bankruptcy Code is the debtor filing?

Check one:

- Chapter 7
- Chapter 9

Chapter 11. Check all that apply:

- Debtor's aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$2,566,050 (amount subject to adjustment on 4/01/19 and every 3 years after that).
- The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D). If the debtor is a small business debtor, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if all of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
- A plan is being filed with this petition.
- Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
- The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11 (Official Form 201A) with this form.
- The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

Chapter 12

9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?

- No.
- Yes.

If more than 2 cases, attach a separate list.

District _____	When _____	Case number _____
District _____	When _____	Case number _____

10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?

- No
- Yes.

List all cases. If more than 1, attach a separate list

Debtor _____	Relationship _____
District _____	When _____ Case number, if known _____

Debtor Pursuit Holdings (NY), LLC f/k/a Pursuit Holdings, LLC
 Name

Case number (if known) _____

11. Why is the case filed in this district?

Check all that apply:

- Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.
- A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?

No

Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.

Why does the property need immediate attention? (Check all that apply.)

It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.

What is the hazard? _____

It needs to be physically secured or protected from the weather.

It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).

Other _____

Where is the property? _____

Number, Street, City, State & ZIP Code

Is the property insured?

No

Yes. Insurance agency _____

Contact name _____

Phone _____

Statistical and administrative information

13. Debtor's estimation of available funds

Check one:

- Funds will be available for distribution to unsecured creditors.
- After any administrative expenses are paid, no funds will be available to unsecured creditors.

14. Estimated number of creditors

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> 1-49 | <input type="checkbox"/> 1,000-5,000 | <input type="checkbox"/> 25,001-50,000 |
| <input type="checkbox"/> 50-99 | <input type="checkbox"/> 5001-10,000 | <input type="checkbox"/> 50,001-100,000 |
| <input type="checkbox"/> 100-199 | <input type="checkbox"/> 10,001-25,000 | <input type="checkbox"/> More than 100,000 |
| <input type="checkbox"/> 200-999 | | |

15. Estimated Assets

- | | | |
|--|---|--|
| <input type="checkbox"/> \$0 - \$50,000 | <input type="checkbox"/> \$1,000,001 - \$10 million | <input type="checkbox"/> \$500,000,001 - \$1 billion |
| <input type="checkbox"/> \$50,001 - \$100,000 | <input checked="" type="checkbox"/> \$10,000,001 - \$50 million | <input type="checkbox"/> \$1,000,000,001 - \$10 billion |
| <input type="checkbox"/> \$100,001 - \$500,000 | <input type="checkbox"/> \$50,000,001 - \$100 million | <input type="checkbox"/> \$10,000,000,001 - \$50 billion |
| <input type="checkbox"/> \$500,001 - \$1 million | <input type="checkbox"/> \$100,000,001 - \$500 million | <input type="checkbox"/> More than \$50 billion |

16. Estimated liabilities

- | | | |
|--|--|--|
| <input type="checkbox"/> \$0 - \$50,000 | <input checked="" type="checkbox"/> \$1,000,001 - \$10 million | <input type="checkbox"/> \$500,000,001 - \$1 billion |
| <input type="checkbox"/> \$50,001 - \$100,000 | <input type="checkbox"/> \$10,000,001 - \$50 million | <input type="checkbox"/> \$1,000,000,001 - \$10 billion |
| <input type="checkbox"/> \$100,001 - \$500,000 | <input type="checkbox"/> \$50,000,001 - \$100 million | <input type="checkbox"/> \$10,000,000,001 - \$50 billion |
| <input type="checkbox"/> \$500,001 - \$1 million | <input type="checkbox"/> \$100,000,001 - \$500 million | <input type="checkbox"/> More than \$50 billion |

Debtor Pursuit Holdings (NY), LLC f/k/a Pursuit Holdings, LLC
Name

Case number *(if known)* _____

Request for Relief, Declaration, and Signatures

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

17. Declaration and signature of authorized representative of debtor

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.
 I have been authorized to file this petition on behalf of the debtor.
 I have examined the information in this petition and have a reasonable belief that the information is true and correct.
 I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 20, 2017
MM / DD / YYYY

/s/ Michael Hayden Sanford
Signature of authorized representative of debtor

 Title Sole Member

Michael Hayden Sanford
Printed name

18. Signature of attorney

/s/ Jenny R. Kasen
Signature of attorney for debtor

Date February 20, 2017
MM / DD / YYYY

Jenny R. Kasen
Printed name

Kasen & Kasen
Firm name

1000 N. West Street
Suite 1200
Wilmington, DE 19801
Number, Street, City, State & ZIP Code

Contact phone 302-652-3300 Email address jkasen@kasenlaw.com

JK1680
Bar number and State

Fill in this information to identify the case:

Debtor name **Pursuit Holdings (NY), LLC f/k/a Pursuit Holdings, LLC**
 United States Bankruptcy Court for the: **DISTRICT OF DELAWARE**
 Case number (if known): _____

Check if this is an
 amended filing

Official Form 204**Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders**

12/15

A list of creditors holding the 20 largest unsecured claims must be filed in a Chapter 11 or Chapter 9 case. Include claims which the debtor disputes. Do not include claims by any person or entity who is an insider, as defined in 11 U.S.C. § 101(31). Also, do not include claims by secured creditors, unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 20 largest unsecured claims.

Name of creditor and complete mailing address, including zip code	Name, telephone number and email address of creditor contact	Nature of claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of claim		
				Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
Cohen, Tauber Spievack & Wagner P.C. Joseph M. Vann, Esq. 420 Lexington Avenue Suite 2400 New York, NY 10170		Legal Fees	Disputed			Unknown
Consolidated Edison Company of NY, Inc ConEd Law Dept. 4 Irving Place, Room 1875-S New York, NY 10003		Utility Bill	Disputed			\$7,500.00 Estimated
Corbally, Gartland and Rappleyea, LLP c/o John Adams, Esq. 35 Market Street Poughkeepsie, NY 12601		Legal fees	Disputed			Unknown
Delphi Capital Management LLC 1319 Mountain Summit Road Travelers Rest, SC 29690	Delphi Capital Management LLC c/o Eric W. Berry, Esq. Berry Law PLLC 5 Columbus Circle, 8th Floor New York, NY 10019	Alleged breach of contract claims	Disputed			Unknown

Debtor **Pursuit Holdings (NY), LLC f/k/a Pursuit Holdings, LLC**
Name

Case number (if known)

Name of creditor and complete mailing address, including zip code	Name, telephone number and email address of creditor contact	Nature of claim (for example, trade debts, bank loans, professional services,	Indicate if claim is contingent, unliquidated, or disputed	Amount of claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
				Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
DEP/BCS NYC Water Board Correspondence Unit PO Box 739055 Flushing, NY 11373		Utility Bill	Disputed			Unknown
Dorsey & Whitney LLP c/o Nick Akerman, Esq. 51 West 52nd Street New York, NY 10019-6119		Legal fees				\$42,017.16
Hampton Bridge Advisors c/o Michael J. Merendino 179 Park Avenue Park Ridge, NJ 07656			Disputed			Unknown
Havens & Lichtenberg, PLLC c/o Jeremy Havens, Esq. 28 Railroad Avenue Warwick, NY 10990		Legal Fees	Disputed			Unknown
Holwell, Shuster & Goldberg, LLP c/o Richard Holwell, Esq. James M. McGuire, Esq. 750 Seventh Avenue, 26th Floor New York, NY 10019		Legal Fees	Disputed			Unknown
Internal Revenue Service Centralized Insolvency Operation P.O. Box 7346 Philadelphia, PA 19101		Capital gains taxes				\$205,930.00 Estimated
JAMS c/o Lawrence W. Pollack, Esq. Kristen Maccubbin 620 Eighth Avenue New York, NY 10018		Arbitration Fees	Unliquidated			\$15,000.00 Estimated

Debtor Pursuit Holdings (NY), LLC f/k/a Pursuit Holdings, LLC
Name

Case number (if known) _____

Name of creditor and complete mailing address, including zip code	Name, telephone number and email address of creditor contact	Nature of claim (for example, trade debts, bank loans, professional services,	Indicate if claim is contingent, unliquidated, or disputed	Amount of claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
				Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
Katsky Korins, LLP c/o Adrienne B. Koch, Esq. 605 Third Avenue New York, NY 10158		Legal Fees	Disputed			Unknown
Law Offices of James A. Prestiano, P.C. c/o James A. Prestiano, Esq. 631 Commack Road Suite 2A Commack, NY 11725		Legal Fees	Disputed			Unknown
Michael I. Knopf 1319 Mountain Summit Road Travelers Rest, SC 29690	Michael I. Knopf c/o Eric W. Berry, Esq. Berry Law PLLC 5 Columbus Circle, 8th Floor New York, NY 10019	Alleged breach of contract claims	Disputed			Unknown
Michael J. Merendino 179 Park Avenue Park Ridge, NJ 07656	Michael J. Merendino c/o Peter J. Vazquez, Jr. Esq. The Vazquez Law Firm 18 Hook Mountain Road Suite 201 Pine Brook, NJ 07058		Disputed			Unknown
Michael Phillips c/o Jamestown, L.P. 5 Ninth Avenue 5th Floor Suite New York, NY 10011	Michael Phillips c/o Adam Hanan, Esq. Nadel & Ciarlo, P.C. 3 East 54th Street 16th Floor New York, NY 10022		Disputed			Unknown
Norma Knopf 1319 Mountain Summit Road Travelers Rest, SC 29690	Norma Knopf c/o Eric W. Berry, Esq. Berry Law PLLC 5 Columbus Circle, 8th Floor New York, NY 10019	Alleged breach of contract claims	Disputed			Unknown

Debtor Pursuit Holdings (NY), LLC f/k/a Pursuit Holdings, LLC
Name

Case number (if known) _____

Name of creditor and complete mailing address, including zip code	Name, telephone number and email address of creditor contact	Nature of claim (for example, trade debts, bank loans, professional services,	Indicate if claim is contingent, unliquidated, or disputed	Amount of claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
				Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
Norma Knopf 1319 Mountain Summit Road Travelers Rest, SC 29690	Norma Knopf c/o Gary Greenberg, Esq. 666 Fifth Avenue New York, NY 10167	Alleged breach of contract claims	Disputed			Unknown
NY State Dept. of Taxation & Finance Office of Counsel Building 9 WA Harriman Campus Albany, NY 12227		Capital gains taxes				\$76,315.00 Estimated
Orange Clockwork Trust c/o Howard Altman Grant Tani, Barash & Altman 9100 Wilshire Blvd. Suite 1000W Beverly Hills, CA 90212	Orange Clockwork Trust c/o Leonard Nathanson, Esq. Robinson Brog Leinwald Greene Genovese & Gluck, P.C. 875 Third Avenue New York, NY 10022					Unknown
Raphael DeNiro c/o Douglas Elliman 774 Broadway New York, NY 10003		Marketing Expenses				\$2,500.00

**United States Bankruptcy Court
District of Delaware**

In re Pursuit Holdings (NY), LLC f/k/a Pursuit Holdings, LLC
Debtor(s)

Case No. _____
Chapter 11

LIST OF EQUITY SECURITY HOLDERS

Following is the list of the Debtor's equity security holders which is prepared in accordance with rule 1007(a)(3) for filing in this Chapter 11 Case

Name and last known address or place of business of holder	Security Class	Number of Securities	Kind of Interest
Michael Hayden Sanford 23 Mckinley Road Montauk, NY 11954			Sole Member

DECLARATION UNDER PENALTY OF PERJURY ON BEHALF OF CORPORATION OR PARTNERSHIP

I, the **Sole Member** of the corporation named as the debtor in this case, declare under penalty of perjury that I have read the foregoing List of Equity Security Holders and that it is true and correct to the best of my information and belief.

Date February 20, 2017

Signature /s/ Michael Hayden Sanford
Michael Hayden Sanford

*Penalty for making a false statement of concealing property: Fine of up to \$500,000 or imprisonment for up to 5 years or both.
18 U.S.C. §§ 152 and 3571.*

**United States Bankruptcy Court
District of Delaware**

In re Pursuit Holdings (NY), LLC f/k/a Pursuit Holdings, LLC Case No. _____
Debtor(s) Chapter 11

VERIFICATION OF CREDITOR MATRIX

I, the Sole Member of the corporation named as the debtor in this case, hereby verify that the attached list of creditors is true and correct to the best of my knowledge.

Date: February 20, 2017

/s/ Michael Hayden Sanford
Michael Hayden Sanford/Sole Member
Signer/Title

BONY Mellon - NYCTL 1998-2 Trust
c/o A.J. Kaplan, Esq.
Seyfarth Shaw LLP
620 Eighth Avenue
New York, NY 10018

Cohen, Tauber Spievack & Wagner P.C.
Joseph M. Vann, Esq.
420 Lexington Avenue
Suite 2400
New York, NY 10170

Consolidated Edison
Company of NY, Inc
ConEd Law Department
4 Irving Place, Room 1875-S
New York, NY 10003

Corbally, Gartland and Rappleyea, LLP
c/o John Adams, Esq.
35 Market Street
Poughkeepsie, NY 12601

Delphi Capital Management LLC
1319 Mountain Summit Road
Travelers Rest, SC 29690

Delphi Capital Management LLC
c/o Eric W. Berry, Esq.
Berry Law PLLC
5 Columbus Circle, 8th Floor
New York, NY 10019

DEP/BCS
NYC Water Board
Correspondence Unit
PO Box 739055
Flushing, NY 11373

Dorsey & Whitney LLP
c/o Nick Akerman, Esq.
51 West 52nd Street
New York, NY 10019-6119

Hampton Bridge Advisors
c/o Michael J. Merendino
179 Park Avenue
Park Ridge, NJ 07656

Havens & Lichtenberg, PLLC
c/o Jeremy Havens, Esq.
28 Railroad Avenue
Warwick, NY 10990

Holwell, Shuster & Goldberg, LLP
c/o Richard Holwell, Esq.
James M. McGuire, Esq.
750 Seventh Avenue, 26th Floor
New York, NY 10019

Internal Revenue Service
Centralized Insolvency Operation
P.O. Box 7346
Philadelphia, PA 19101

JAMS
c/o Lawrence W. Pollack, Esq.
Kristen Maccubbin
620 Eighth Avenue
New York, NY 10018

Katsky Korins, LLP
c/o Adrienne B. Koch, Esq.
605 Third Avenue
New York, NY 10158

Law Offices of James A. Prestiano, P.C.
c/o James A. Prestiano, Esq.
631 Commack Road
Suite 2A
Commack, NY 11725

Meister Seelig & Fein, LLP
c/o Stephen B. Meister, Esq.
125 Park Avenue 7th Floor
New York, NY 10017

Meister Seelig & Fein, LLP
125 Park Avenue 7th Floor
New York, NY 10017

MH Sanford & Co., LLC
c/o Michael Hayden Sanford
23 Mckinley Road
Montauk, NY 11954

Michael Hayden Sanford
23 Mckinley Road
Montauk, NY 11954

Michael I. Knopf
1319 Mountain Summit Road
Travelers Rest, SC 29690

Michael I. Knopf
c/o Eric W. Berry, Esq.
Berry Law PLLC
5 Columbus Circle, 8th Floor
New York, NY 10019

Michael J. Merendino
179 Park Avenue
Park Ridge, NJ 07656

Michael Phillips
c/o Jamestown, L.P.
5 Ninth Avenue
5th Floor Suite
New York, NY 10011

Michael Phillips
c/o Adam Hanan, Esq.
Nadel & Ciarlo, P.C.
3 East 54th Street, 16th Floor
New York, NY 10022

Norma Knopf
1319 Mountan Summit Road
Travelers Rest, SC 29690

Norma Knopf
c/o Gary Greenberg, Esq.
666 Fifth Avenue
New York, NY 10167

Norma Knopf
c/o Eric W. Berry, Esq.
Berry Law PLLC
5 Columbus Circle, 8th Floor
New York, NY 10019

NY State Dept. of Taxation & Finance
Office of Counsel
Building 9
WA Harriman Campus
Albany, NY 12227

NYC Department of Taxation and Finance
P.O. Box 680
Newark, NJ 07101-0680

NYCTL 1998-2 Trust
c/o A.J. Kaplan, Esq.
Seyfarth Shaw LLP
620 Eighth Avenue
New York, NY 10018

Orange Clockwork Trust
c/o Howard W. Altman, Trustee
Grant Tani Barash & Altman
9100 Wilshire Blvd., Suite 1000W
Beverly Hills, CA 90212

Orange Clockwork Trust
c/o Leonard Nathanson, Esq.
Robinson Brog Leinwald Greene Genovese &
875 Third Avenue
New York, NY 10022

Raphael DeNiro
c/o Douglas Elliman
774 Broadway
New York, NY 10003

Sanford Partners, LP
c/o Michael Hayden Sanford
23 Mckinley Road
Montauk, NY 11954

Ten Bedford Condominium, LLC
c/o Howard Altman, Condominium President
Grant Tani Barash & Altman
9100 Wilshire Blvd.
Beverly Hills, CA 90212

Wyndclyffe, LLC
c/o Michael Hayden Sanford
23 Mckinley Road
Montauk, NY 11954

**United States Bankruptcy Court
District of Delaware**

In re Pursuit Holdings (NY), LLC f/k/a Pursuit Holdings, LLC

Debtor(s)

Case No.

Chapter 11

CORPORATE OWNERSHIP STATEMENT (RULE 7007.1)

Pursuant to Federal Rule of Bankruptcy Procedure 7007.1 and to enable the Judges to evaluate possible disqualification or recusal, the undersigned counsel for Pursuit Holdings (NY), LLC f/k/a Pursuit Holdings, LLC in the above captioned action, certifies that the following is a (are) corporation(s), other than the debtor or a governmental unit, that directly or indirectly own(s) 10% or more of any class of the corporation's(s') equity interests, or states that there are no entities to report under FRBP 7007.1:

None [*Check if applicable*]

February 20, 2017

Date

/s/ Jenny R. Kasen

Jenny R. Kasen JK1680

Signature of Attorney or Litigant

Counsel for Pursuit Holdings (NY), LLC f/k/a Pursuit Holdings, LLC

Kasen & Kasen

1000 N. West Street

Suite 1200

Wilmington, DE 19801

302-652-3300 Fax:856-424-7565

jkasen@kasenlaw.com

**United States Bankruptcy Court
District of Delaware**

In re Pursuit Holdings (NY), LLC

Debtor(s)

Case No.

Chapter

11

**LIMITED LIABILITY COMPANY RESOLUTION
GRANTING AUTHORITY TO SIGN AND FILE BANKRUPTCY PETITION**

The undersigned, being the sole member (the "Sole Member") of Pursuit Holdings (NY), LLC f/k/a Pursuit Holdings, LLC, a Delaware limited liability company (the "Company"), hereby takes the following actions and adopts the following resolutions as of this 20th day of February, 2017:

Whereas, it is in the best interest of the Company to file a voluntary petition in the United States Bankruptcy Court pursuant to Chapter 11 of Title 11 of the United States Code;

Be It Therefore Resolved, that Michael Hayden Sanford, Sole Member of the Company, is authorized and directed to execute and deliver all documents necessary to perfect the filing of a chapter 11 voluntary bankruptcy case on behalf of the Company; and

Be It Further Resolved, that Michael Hayden Sanford, Sole Member of this Company is authorized and directed to appear in all bankruptcy proceedings on behalf of the Company, and to otherwise do and perform all acts and to execute and deliver all necessary documents on behalf of the Company in connection with such bankruptcy case, and

Be It Further Resolved, that Michael Hayden Sanford, Sole Member of this Company is authorized and directed to employ the law firm of Kasen & Kasen, P.C. to represent the Company in such bankruptcy case.

Date February 20, 2017

Signed /s/ Michael Hayden Sanford

**Michael Hayden Sanford, Sole Member of
Pursuit Holdings (NY), LLC f/k/a Pursuit
Holdings, LLC**