



ORSON AND BRUSINI LTD

C O U N S E L O R S   A T   L A W

www.orsonandbrusini.com

Harmony Conti Bodurtha  
(401) 223-2100  
[hbodurtha@orsonandbrusini.com](mailto:hbodurtha@orsonandbrusini.com)

February 11, 2021

TO: CREDITORS AND ALL OTHER PARTIES IN INTEREST

Re: Jodi Greenblatt vs. Wayfarers USA, Inc.  
C.A. No. KC2021-0015

On January 22, 2021, the Rhode Island Superior Court in Kent County entered an Order Appointing a Temporary Receiver of the property and assets of Wayfarers USA, Inc. ("Wayfarers"), Harmony Bodurtha has been appointed the Temporary Receiver of Wayfarers.

The Temporary Receiver is an Officer of the Court, appointed to represent the interests of all creditors and parties in interest. Our office does not and has not represented any owner of Wayfarers or its equity holders. The Temporary Receiver has been appointed as a neutral, impartial Temporary Receiver, for the purpose of stabilizing the financial affairs of Wayfarers continuing its business operations, if appropriate, and subject to Court approval, after notice to all creditors, marketing and selling the business and assets for the highest value, in order to maximize recovery for creditors.

Preliminarily, it appears that Wayfarers has approximately \$150,000 secured creditor debt and has unsecured debt of approximately \$450,000.

In connection with the receivership proceeding, as set forth in Paragraph 7 of the enclosed Order, all creditors are restrained, enjoined and stayed from taking any action to enforce their claims against Wayfarers.

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

In order that your interests be protected and that you make sure that you receive notice of all appropriate court filings in connection with this case, I am taking the liberty of enclosing a Proof of Claim form which I suggest that you complete, execute before a Notary Public, and return to me at the earliest possible date.

144 Wayland Avenue  
Providence, RI 02906  
phone 401-223-2100  
fax 401-861-3103

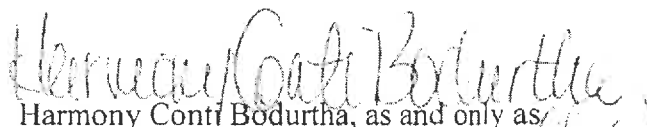
336 Main Street  
Wakefield, RI 02879  
phone 401-788-9080  
fax 401-788-9084

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

As set forth in the enclosed Order Appointing Temporary Receiver, please be advised that a hearing on the appointment of a permanent receiver is scheduled for **March 8, 2021 at 9:30 a.m.** In accordance with Supreme Court Executive Order No. 2020-09, the hearing will be conducted remotely. Information concerning public access to the audio during the hearing will be located on the Judiciary's website at [www.courts.ri.gov](http://www.courts.ri.gov).

If you have questions regarding the foregoing, please feel free to contact the undersigned at 401-223-2100. Thank you.

Very truly yours,

  
Harmony Contj Bodurtha, as and only as  
Temporary Receiver of Wayfarers USA (Inc.)  
Inc. and not Individually

HCB:dmc  
Enclosures

STATE OF RHODE ISLAND  
KENT, SC.

SUPERIOR COURT

JODI GREENBLATT  
*Petitioner,*

v.

KC-2021-0015

WAYFARERS USA, INC.  
*Respondent.*

**ORDER APPOINTING TEMPORARY RECEIVER**

This cause came before the Court on January 8, 2021 on Petitioners' Petition for Appointment of a Receiver and, after hearing, it is hereby

**ORDERED, ADJUDGED AND DECREED**

1. That Harmony Bodurtha of Providence, Rhode Island be and hereby is appointed Temporary Receiver (the "Receiver") of Respondent Wayfarers USA, Inc.

2. That said Receiver shall forthwith file a bond in the sum of \$10,000 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's hands and abide by and perform all things which the Receiver will be directed to do by this Court.

3. That said 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 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 counsel, to engage 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.

5. That said Receiver shall file an application with the Court before proceeding with the liquidation of Respondent's assets.

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 afore-described 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 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 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 obtaining 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. The Court will conduct a conference with the Receiver and counsel for the parties on \_\_\_\_\_, at \_\_\_\_\_ .m.


10. That a Citation be issued to Respondent, returnable to the Superior Court, sitting at Kent County Rhode Island on March 8, 2021 at 9:30 a.m. at which time and place this cause is set down for Hearing on the prayer for Appointment of a Permanent Receiver; that the Clerk of this Court shall give Notice of the pendency of the Petition herein by publishing this Order Appointing Temporary Receiver once in the Providence Journal on or before on February 6, 2021, and the Receiver shall give further notice by mailing, on or before on February 16, 2021, a copy of said Order Appointing Temporary Receiver to each of Respondent's creditors and stockholders whose address is known or may become known to the Receiver.

ENTERED as an Order of this Court this 22nd day of January, 2021.

ENTER:

BY ORDER:

  
\_\_\_\_\_  
Associate Justice  
Richard Licht  
Dated: \_\_\_\_\_  
Associate Justice

  
\_\_\_\_\_  
Clerk, Superior Court  
Michael C. Rampone  
Dated: \_\_\_\_\_  
Deputy Clerk I

**STATE OF RHODE ISLAND  
KENT, SC.**

**SUPERIOR COURT**

JODI GREENBLATT,  
*Plaintiff,*

vs.

WAYFARERS USA, INC.  
*Defendant.*

KC-2021-0015

**RECEIVERSHIP PROOF OF CLAIM FORM**

I, \_\_\_\_\_, being duly sworn, depose and say:

\_\_\_\_\_ (INDIVIDUAL) I am the claimant herein.

\_\_\_\_\_ (PARTNERSHIP) I am a partner of \_\_\_\_\_ which is the claimant herein.

\_\_\_\_\_ (CORPORATION) I am an officer, to wit, \_\_\_\_\_, of \_\_\_\_\_, which is the claimant herein.

The full address of the claimant is \_\_\_\_\_  
(complete address, including zip code) \_\_\_\_\_.

That on the **22<sup>nd</sup>** day of **January, 2021**, **Wayfarers USA, Inc.**, doing business in Newport, RI did owe and still does owe the claimant a balance of \$ \_\_\_\_\_ dollars, a statement of which account is attached hereto.

That such account is just, true and correct, and said balance is now due claimant from debtor.

That no part thereof has been paid or satisfied, and that there are no set-offs, or counterclaims thereto, to the knowledge or belief of deponent and that no security exists for said debt.

That the attorneys named on this Proof of Claim are hereby made and constituted attorneys for all purposes whatsoever in connection with this claim with full power of substitution (if an attorney is filing for you).

\_\_\_\_\_  
(Signature of Claimant)

STATE OF \_\_\_\_\_  
COUNTY OF \_\_\_\_\_

Subscribed and sworn to before me on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Notary Public  
My Commission Expires: \_\_\_\_\_

**Please send this Proof of Claim, and any documentation supporting your claim, to:  
Harmony Conti Bodurtha, as Temporary Receiver, Orson and Brusini Ltd., 144 Wayland Avenue,  
Providence, Rhode Island 02906.**