

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

MELODY YIRU, aka SHI YIRU, et al.,
PLAINTIFFS,

V.

WORLDVENTURES HOLDINGS, LLC,
et al.,
DEFENDANTS,

CIVIL ACTION NO. 3:17-cv-02155-S

[JURY TRIAL DEMANDED]

**DEFENDANTS' SUGGESTION OF BANKRUPTCY AND
NOTICE OF OPERATION OF THE AUTOMATIC STAY**

PLEASE TAKE NOTICE that on December 21, 2020, (the “**Petition Date**”), Spherature Investments, LLC (f/k/a WorldVentures Holdings, LLC), Rovia, LLC, WorldVentures Marketing Holdings, LLC, WorldVentures Marketplace, LLC, WorldVentures Marketing, LLC, and WorldVentures Services, LLC (collectively, the “**Debtors**”)¹, each filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the “**Bankruptcy Code**”), in the United States Bankruptcy Court for the Eastern District of Texas (the “**Bankruptcy Court**”), which the Debtors have requested be jointly administered under the case number for Spherature Investments LLC, 20-42492. A true and correct copy of the Notice of Bankruptcy Case Filing for Spherature Investments LLC (f/k/a WorldVentures Holdings, LLC) and WorldVentures Marketing LLC is attached hereto as **Exhibit “A”**.

¹ The “Debtors” in the jointly administered Chapter 11 bankruptcy cases are: Spherature Investments LLC (EIN#5471); Rovia, LLC (EIN#7705); WorldVentures Marketing Holdings, LLC (EIN#3846); WorldVentures Marketplace, LLC (EIN#6264); WorldVentures Marketing, LLC (EIN#3255); WorldVentures Services, LLC (EIN#2220).

PLEASE TAKE FURTHER NOTICE that pursuant to section 362(a) of the Bankruptcy Code, the commencement of the chapter 11 cases operates as a stay (the “**Automatic Stay**”), applicable to all of the Debtors, including, without limitation, Defendants WorldVentures Holdings, LLC (n\k\a\ Spherature Investments, LLC) and WorldVentures Marketing, LLC, of among other things: “the commencement or continuation, including the issuance or employment of process, of a judicial, administrative or other action or proceeding against the debtor that was or could have been commenced before the commencement of the case under this title, or to recover a claim against the debtor that arose before the commencement of the case under this title.” 11 U.S.C. § 362(a). Accordingly, effective December 21, 2020, this and all actions against the Debtors and their bankruptcy estates are subject to the Automatic Stay and enjoined from proceeding further absent relief from the Bankruptcy Court.

PLEASE TAKE FURTHER NOTICE that actions taken in violation of the Automatic Stay are void and may subject the person or entity taking such action to the imposition of sanctions by the Bankruptcy Court.

PLEASE TAKE FURTHER NOTICE that additional information regarding the Debtors’ chapter 11 cases is available on the Bankruptcy Court’s website at <https://ecf.txeb.uscourts.gov/> or from proposed counsel for the Debtors at Foley & Lardner LLP, c/o Marcus A. Helt (mhelt@foley.com) and Thomas C. Scannell (tscannell@foley.com), 2021 McKinney Avenue, Suite 1600, Dallas, Texas 75201, phone: 214-999-3000.

Respectfully submitted,

/s/ Blake A. Bailey

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WORLDVENTURES HOLDINGS, LLC,
WORLDVENTURES MARKETING, LLC,
WORLDVENTURES FOUNDATION,
WORLDVENTURES, WAYNE NUGENT,
AND DANIEL STAMMEN**

CERTIFICATE OF SERVICE

On this 28th day of December 2020, I electronically submitted the foregoing documents with the clerk of the Court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I therefore certify that I have served all counsel of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Blake A. Bailey

Blake Bailey

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**PROPOSED COUNSEL FOR THE DEBTORS
AND DEBTORS-IN-POSSESSION**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

In re: § **Chapter 11**
§
SPHERATURE INVESTMENTS LLC,¹ § **Case No.: 20-42492**
§
Debtors. § **Joint Administration Requested**

**NOTICE OF COMMENCEMENT OF CHAPTER 11 CASES
AND EMERGENCY HEARING ON CERTAIN FIRST-DAY MATTERS**

PLEASE TAKE NOTICE that on December 21, 2020 (the “**Petition Date**”), the Debtor in the above-captioned case (the “**Chapter 11 Case**”), filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”) in the United States Bankruptcy Court for the Eastern District of Texas (the “**Bankruptcy Court**”).

PLEASE TAKE FURTHER NOTICE that contemporaneously with the Petition Date, in addition to its chapter 11 petition and other related matters, the Debtors filed the following listed first-day motions and related pleadings in the lead case *In re Spherature Investments LLC*, Case Number 20-42492 (collectively, the “**First-Day Matters**”):

¹ The “**Debtors**” in the above-captioned jointly administered chapter 11 bankruptcy cases (“**Cases**”) are: Spherature Investments LLC (“**Spherature**”) EIN#5471; Rovia, LLC (“**Rovia**”) EIN#7705; WorldVentures Marketing Holdings, LLC (“**WV Marketing Holdings**”) EIN#3846; WorldVentures Marketplace, LLC (“**WV Marketplace**”) EIN#6264; WorldVentures Marketing, LLC (“**WV Marketing**”) EIN#3255; WorldVentures Services, LLC (“**WV Services**”) EIN#2220.

1. Motion for Joint Administration [Dkt. 3]
2. Request for Emergency Hearing [Dkt. 4]
3. Notice of Complex Case Designation [Dkt. 7]
4. Motion to Extend Time to File Schedules and Statements [Dkt. 8]
5. Motion to Establish Complex Case Notice Procedures [Dkt. 9]
6. Motion to Maintain Prepetition Insurance Policies [Dkt. 10]
7. Motion to Honor Prepetition Obligations to Customers [Dkt. 13]
8. Motion to Pay Prepetition Wages, Salaries and Commissions [Dkt. 16]
9. Motion to Pay Prepetition Priority Taxes [Dkt. 17]
10. Motion to Use Cash Collateral [Dkt. 18]
11. Motion to Prohibit Utilities from Discontinuing Service and Providing Utilities with Adequate Assurance [Dkt. 19]
12. Declaration of Chief Restructuring Officer in Support of First Day Relief [Dkt. 20]
13. Motion to Maintain Treasury and Cash Management Systems [Dkt. 21]

PLEASE TAKE FURTHER NOTICE that the above matters are set for emergency hearing on **December 30, 2020, at 10:00 a.m. (prevailing Central Time)** before the Honorable Brenda T. Rhoades, Bankruptcy Judge for the United States Bankruptcy Court for the Eastern District of Texas. **The hearing will be held telephonically. Parties are instructed to dial 1-888-675-2535, use Access No. 4225607 and Security No. 7459,** as well as directed to review the instructions contained in the following link for all telephonic hearings before Judge Rhoades: <http://www.txeb.uscourts.gov/content/judgerhoades>. The information can be found by accessing the Court's webpage at www.txeb.uscourts.gov and choosing "Judge's Info", then choosing "Judge Rhoades", and then choosing "Telephonic Hearing" Tab.

PLEASE TAKE FURTHER NOTICE that the all of the pleadings listed above and supporting papers are available on the Bankruptcy Court's website at <https://ecf.txeb.uscourts.gov/>. You can request any pleading you need from counsel for the Debtor at: Foley & Lardner LLP, c/o Thomas C. Scannell, 2021 McKinney Avenue, Suite 1600, Dallas, Texas 75201 (tscannell@foley.com).

PLEASE TAKE FURTHER NOTICE that *your rights may be affected*. You should read the First-Day Pleadings carefully and discuss them with your attorney, if you have one in connection with the Chapter 11 Case. (If you do not have an attorney, you may wish to consult with one).

DATED: December 23, 2020

Respectfully submitted by:

/s/ Marcus A. Helt
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**PROPOSED COUNSEL FOR THE DEBTORS
AND DEBTORS-IN-POSSESSION**

CERTIFICATE OF SERVICE

I hereby certify that, on December 23, 2020, a true and correct copy of the foregoing document was served electronically on all parties in interest to these Cases by the Court's PACER system.

/s/ Thomas C. Scannell
Thomas C. Scannell