FILED VIA MAIL

FEB 03 2026

CLERK, U.S. BANKRUPTCY
ORLANDO DIVISION

IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA

In re: Red Lobster Management LLC, et al.
Case No.: 24-02486 Chapter 11

MOTION TO REOPEN CASE

COMES NOW, Creditor and Movant, Dawn Smith, appearing pro se, and respectfully moves this Court to reopen the above-captioned bankruptcy case pursuant to 11 U.S.C. § 350(b).

1. Movant holds a personal-injury claim from August 12, 2023 in Southaven, MS.
2. Movant received no notice of bankruptcy proceedings.
3. Movant previously filed Motion for Relief from Stay.
4. Case must be reopened to adjudicate that motion.

WHEREFORE, Movant respectfully requests reopening of this case.

Respectfully submitted,
Dawn Smith
3503 Daggett Road
Memphis, TN 38109

Signature: Dawn Smith Date: 01.13.2026

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Motion to Reopen Case was served by U.S. Mail upon Debtor, Debtor's Counsel, and Trustee on the date written below.

Signature: Dawn Smith Date: 01·13·2026

Motion to Recognize Claim as Not Discharged

Dawn Smith 01.13.2026

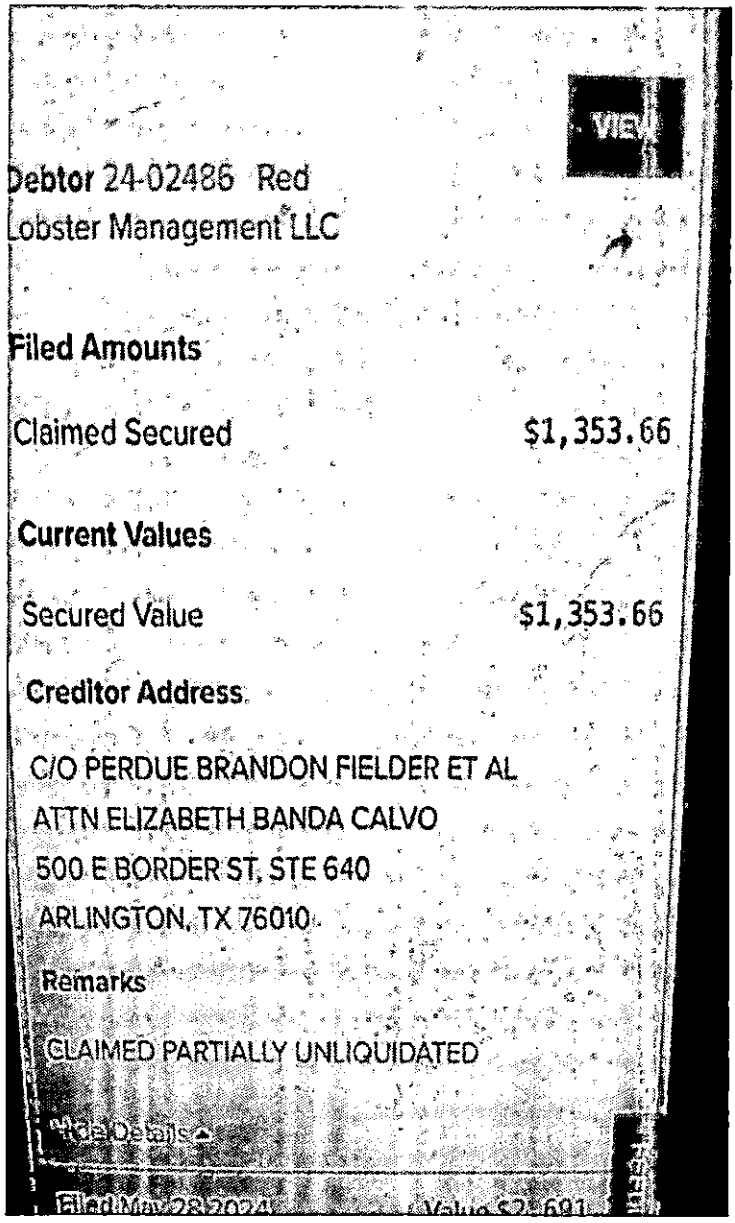
Creditor: Dawn Smith
Address: 3503 Daggett Road, Memphis TN 38109
Phone: 901-826-7508
Email: Dawnsmith955@gmail.com

Creditor requests the Court recognize the personal injury claim was not discharged due to lack of notice and opportunity to file a proof of claim.

Exhibit A

Although the Debtor scheduled Claimant as a creditor, the docket reflects only 'ADDRESS ON FILE,' while other creditors are listed with full mailing addresses. Claimant never received notice of the bankruptcy or bar date. Absent constitutionally adequate notice, Claimant's personal injury claim cannot be discharged.

Exhibit B



VIEW

Debtor 24-02486 Red Lobster Management LLC

Filed Amounts

Claimed Secured	$1,353.66

Current Values

Secured Value	$1,353.66

Creditor Address

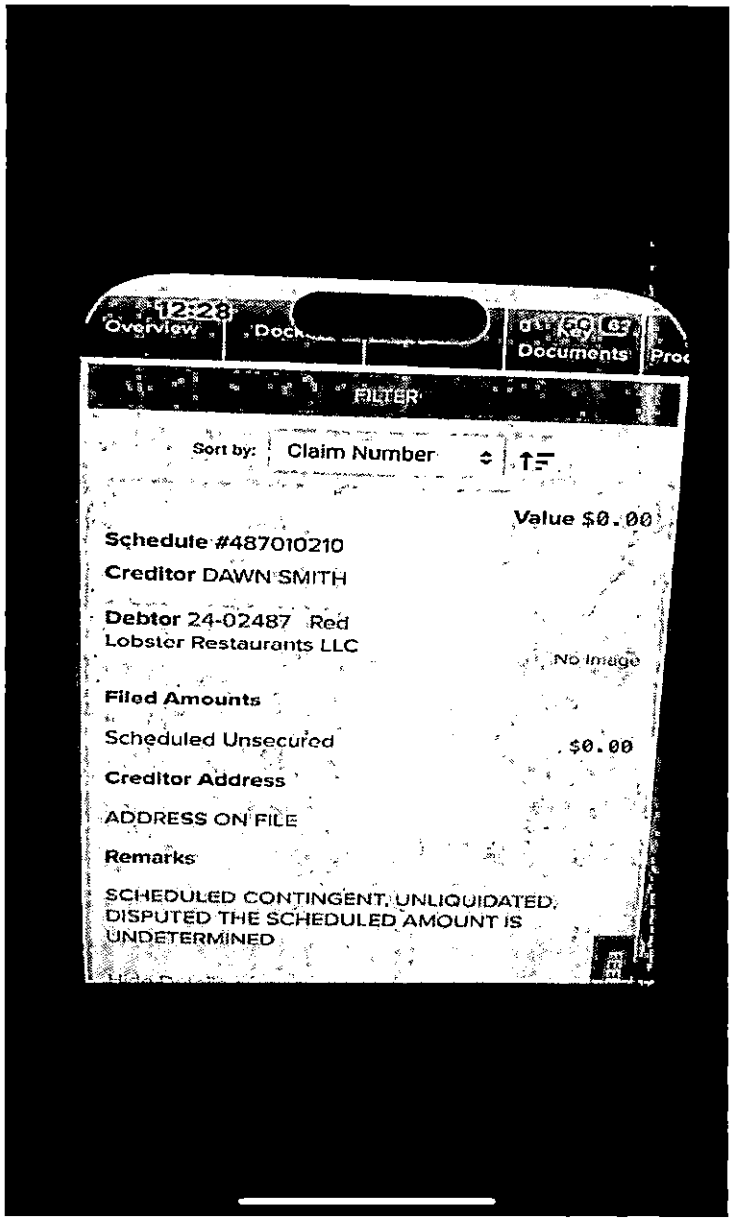
C/O PERDUE BRANDON FIELDER ET AL
ATTN ELIZABETH BANDA CALVO
500 E BORDER ST, STE 640
ARLINGTON, TX 76010

Remarks

CLAIMED PARTIALLY UNLIQUIDATED

Hide Details

Filed May 28 2024 Value $2,691


12:28
Overview
Documents
FILTER
Sort by:
Claim Number
Value $0.00
Schedule #487010210
Creditor DAWN SMITH
Debtor 24-02487 Red Lobster Restaurants LLC
No Image
Filed Amounts
Scheduled Unsecured
$0.00
Creditor Address
ADDRESS ON FILE
Remarks
SCHEDULED CONTINGENT, UNLIQUIDATED, DISPUTED THE SCHEDULED AMOUNT IS UNDETERMINED

AFFIDAVIT OF MARILYN L. CLARK

STATE OF TENNESSEE)
)
COUNTY OF SHELBY)

1. I, Marilyn L. Clark, swear and affirm that I am a resident of Shelby County, Tennessee. I am an adult, and this affidavit is made upon my oath and upon my personal knowledge.

2. On August 12, 2023, I was a witness to a fall that occurred at the Red Lobster restaurant in Southaven, Mississippi.

3. I was with my co-worker, Dawn Smith, when her fall occurred.

4. I was leaving the Red Lobster restaurant with Dawn and a few other co-workers. As we approached the receptionist area to exit the restaurant, I saw Dawn suddenly drop to the ground!

5. Another male customer helped Dawn by lifting one of her arms to try to assist her, and I helped Dawn by lifting her other arm. However, Dawn continued to fall to the ground, and was not able to get up initially.

6. After Dawn fell, I heard another female Red Lobster employee, who was close-by, state, "I told them that!" I asked her about her statement. The female employee stated that she had previously reported to her employer that their bus boys should not transport trays of food through this area, due to the danger that customers may slip on dropped food from their trays.

7. After Dawn fell, it appeared that a mushy piece of food was stuck to the bottom of her shoes.

8. I also saw that a manager took Dawn to the rear of the restaurant and talked with her about what happened for several minutes. I think this manager filled out a report about Dawn's fall.

9. It appeared that Dawn was injured, and it is my understanding that she had to go to the emergency room for medical attention.

10. It is my opinion that the Red Lobster restaurant is wholly at fault for this injury to Dawn because they created a dangerous condition by not keeping their floors clean.

11. Red Lobster should have adequately protected their patrons and customers as a reasonable person could fall in these conditions, just as Dawn fell.

12. I do not think that Dawn did anything to cause her fall or her injury.

13. The above statements are made to the best of my knowledge and belief.

FURTHER AFFIANT SAYTH NOT

MARILYN L. CLARK, Affiant

STATE OF Tennessee
COUNTY OF Shelby

On this 13 day of September, 2023, before me personally appeared Marilyn L. Clark, to me known to be the person who executed the foregoing instrument, and acknowledged that she executed the same as her free act and deed.

Notary Public

My Commission Expires: 5/5/2027

BRANDI M. KIRKPATRICK
STATE OF TENNESSEE NOTARY PUBLIC
SHELBY COUNTY