

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

Jeffrey Baron §
Appellant §
v. § CASE NO. 3:12-cv-00367-F (O)
Chapter 11 Trustee Daniel J. Sherman §
Appellee §

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

In re: §
§ Case No. 09-34784-SGJ
ONDOVA LIMITED COMPANY, § (Chapter 11)
Debtor §

**APPELLANT’S STATEMENT OF ISSUES ON APPEAL AND DESIGNATION OF
ITEMS FOR THE RECORD**

NOW COMES Appellant, in accordance with Rule 6(b)(2)(B)(i) of the Federal Rules of Appellate Procedure and files this, Appellants’ Statement of Issues on Appeal and designation of the record to be certified and sent to the circuit clerk, as follows:

1. Whether the Bankruptcy Court erred in granting the motion to sell the domain name servers.com.
2. Whether the Movant carried its burden of proof of ownership of the asset authorized sold.
3. Whether the debtor or bankruptcy estate is the owner of the asset authorized sold.
4. Whether the Bankruptcy Court had subject matter jurisdiction to enter its order.
5. Whether the Bankruptcy Court erred in refusing to allow Mr. Schepps to represent Jeffrey Baron’s interests and/or to appear on behalf of Mr. Baron to object to the motion for authority to sell the asset.
6. Whether the Bankruptcy Court had authority to make a determination as to the ownership interest in the property outside of an adversary proceeding.
7. Whether the Bankruptcy Court has authority or power pursuant to the doctrine of *Stern v. Marshall*, the U.S. Constitution and/or the Bankruptcy Code or Rules to adjudicate or determine title and ownership of the property authorized to be sold.

8. Whether the description of the property sold is legally sufficient to have effect under the law.
9. The validity of any sale pursuant to the order.

<u>Item No</u>	<u>Bankruptcy Docket Description</u>	<u>Document No.</u>
1	10-7-2011 Motion to sell property under Section 363(b) Filed by Trustee Daniel J. Sherman (Attachments_ _ (1) Proposed Order) (Pannier, Lee) [658]	658
2	11-9-2011 Support-supplemental document The Receiver's Supplement to Response and Reservation of Rights Related to Trustee's Motion for Authority to Sell Property of the Estate-Servers.com filed by Other [682]	682
3	11-14-2011 Order granting trustee's motion to sell property of the estate [servers.com] (related document _ _658_) Entered on 11-14-2011. (Moroles, D.) [691]	691
3	8-27-2012 Order Discharging Show Cause Matters Pertaining to Attorneys Gary Schepps and Christopher Payne. Entered on 8-27-2012 (RE_ related document(s)_637_ Motion to strike document, [807]	807
4	Transcript regarding Hearing Held 11/09/2011 RE: Motions to Sell Property.	687

Respectfully submitted,
/s/ Gary N. Schepps
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CERTIFICATE OF SERVICE

This is to certify that this was served on all parties who receive notification through the Court's electronic filing system.

/s/ Gary N. Schepps