

**Exhibit 1**  
**(Declaration)**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re: ) Chapter 7  
)  
Renovo Home Partners, LLC, *et al.*,<sup>1</sup> ) Case No. 25-11937 (TMH)  
)  
) (Jointly Administered)  
Debtors. )  
) **Related Docket No.** \_\_\_\_\_  
)

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**DECLARATION IN SUPPORT OF REQUEST FOR STAY RELIEF TO PURSUE  
RECOVERY FROM NON-ESTATE SOURCE AND WAIVER OF CERTAIN RIGHTS  
AS A FORMER CUSTOMER OF THE DEBTOR(S)**

I, \_\_\_\_\_, hereby state and declare that the following is true to the best of my knowledge, information and belief:

1. I am an individual residing at \_\_\_\_\_, \_\_\_\_\_.  
\_\_\_\_\_. \_\_\_\_\_ (e-mail address: \_\_\_\_\_). This Declaration is submitted in compliance with the *Order Granting Motion of Ricardo Palacio, Chapter 7 Trustee, for Entry of an Order (i) Approving Voluntary Procedures Governing Requests for Relief from the Automatic Stay to Pursue Claims and Seek Recoveries from the Minnesota Contractor Recovery Fund (or Similar Non-Estate Sources of Recovery) and (ii) Granting Related Relief* [Docket No. \_\_\_\_] (the “Stay Relief Procedures Order”).<sup>2</sup>

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<sup>1</sup> The Debtors in these Cases, along with the last four digits of each Debtor’s federal tax identification number are as follows: Renovo Home Partners, LLC (1823); HomeRenew Intermediate Holdings, Inc. (6614); HomeRenew Buyer, Inc. (9541); Dreamstyle Remodeling, LLC (2744); Dreamstyle Remodeling of California, LLC (2383); Legacy Custom Building & Remodeling (0376); Dreamstyle Remodeling of Idaho, LLC (4854); Dreamstyle Remodeling of Colorado, LLC (1233); Remodel USA, LLC (9255); Alure Designs, LLC (3142); Alure Home Improvements, LLC (6347); Reborn Cabinets, LLC (5709); Woodbridge Home Solutions of Kansas, LLC (8877); Newpro Operating, LLC (5129); Minnesota Rusco, LLC (7330); Woodbridge Home Solutions, LLC (0470); Newpro Plumbing LLC (7630); Reborn Manufacturing, LLC (4161); Woodbridge Shower and Bath LLC (2087). The Debtors’ mailing address was 4519 Sigma Road, Suite 100, Dallas, TX 75244.

<sup>2</sup> Any capitalized term not defined herein shall have the meaning given to such term in the Stay Relief Procedures Order.

2. The facts set forth in this Declaration are personally known to me, and if called as a witness, I could and would testify as set forth herein.

3. On or about \_\_\_\_\_, \_\_\_\_\_, I entered into an agreement (the “Agreement”) with [Minnesota Rusco, LLC] (the “Debtor”) for certain repair or remodeling products and services to be installed at my residence (the “Project”). A copy of the Agreement is \_\_\_\_\_, or is not \_\_\_\_\_, attached hereto.

4. On or about \_\_\_\_\_, \_\_\_\_\_, I provided a deposit in the amount of \$ \_\_\_\_\_ to the Debtor.

5. The Debtor failed to complete the Project as required by the Agreement.

6. I understand that the Minnesota Department of Labor and Industry (“DOL”) created a Contractor Recovery Fund, which is a state-operated fund created to compensate certain owners or lessees of residential property who have suffered a direct and out-of-pocket loss due to fraudulent, deceptive, or dishonest practices, conversion of funds or failure of performance that arose out of a contract directly between the licensee and the homeowner. I have reviewed the Contractor Recovery Fund Fact Sheet available online at DOL’s website at: <https://www.dli.mn.gov/workers/homeowners/contractor-recovery-fund>.

7. I desire to obtain a judgment against the Debtor for the sole purpose of submitting a claim for reimbursement through the Contractor Recovery Fund.

8. I filed a claim with DOL requesting reimbursement from the Contractor Recovery Fund: Yes \_\_\_\_\_; No \_\_\_\_\_. If Yes, I filed my claim on or about: \_\_\_\_\_ in the amount of \$ \_\_\_\_\_ and my claim has been assigned [Claim Number \_\_\_\_\_].

9. In the event I receive any amount from the Contractor Recovery Fund, I will account for any recovery in any proof(s) of claim that I may file against any Debtor, and/or I will

amend any proof(s) of claim (“Claims”) that I filed (or that were filed on my behalf) against any Debtors’ bankruptcy cases to reduce the amount of my Claim(s) by an amount equal to the amount of my recovery from the Contractor Recovery Fund.

10. I further waive any right to request documents or information from the Trustee or the Debtor’s Estate solely in connection with my effort to obtain a judgment against the Debtor and claim for reimbursement through the Contractor Recovery Fund.

11. I understand that the Trustee reserves all of his rights, claims and defenses with respect to me and any Claims that I file in the Debtors’ Cases.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed on this \_\_\_\_ day of \_\_\_\_\_, 2026.

\_\_\_\_\_  
[Name]