

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION
www.flsb.uscourts.gov

In re:

POMPANO SENIOR SQUADRON
FLYING CLUB, INC.,

Debtor.

CASE NO.: 22-15714-PDR

Chapter 11
(Subchapter V)

**AGREED EX PARTE MOTION TO CONTINUE HEARING ON DEBTOR'S
OBJECTION TO CLAIM OF CHARLY J. GUZMAN**

Charly J. Guzman (“Guzman”), by and through undersigned counsel, files this *Agreed Ex Parte* Motion to Continue (the “Motion”) the Hearing on Debtor, Pompano Beach Flying Club, Inc.’s (the “Debtor”), objection to the claim filed by Guzman in the instant proceeding, and in support thereof, states as follows:

INTRODUCTION

1. On December 2, 2022, Debtor filed its Objection to Claim of Charly Guzman (Claim No. 6)[ECF 81] (the “Objection”).
2. On December 16, 2023, the Court entered an Agreed Order Sustaining, In Part, and Continuing Hearing on Objection to Claim of Charly Guzman [ECF 76, 79][ECF 98] (the “Order”), pursuant to which, *inter alia*, the objection to Guzman’s claim was disallowed solely as to its priority as a secured claim, and Guzman’s claim was classified as a class 3 general unsecured claim for distribution purposes in the event the Objection is ultimately overruled.
3. A hearing on the Objection is currently scheduled to occur on April 6, 2023 (the “Hearing”).

4. Undersigned counsel, and counsel for the Debtor, are in the process of negotiating a potential resolution of the issues raised in the Objection which, if successful, will obviate the need for a hearing on same.

5. Consequently, Guzman, and the Debtor, respectfully request that the Hearing be rescheduled for a date not before May 15, 2023.

6. Undersigned counsel certifies that he obtained the consent of Guzman to continue the Hearing and that he contacted Debtor's counsel regarding this Motion, and that Debtor's counsel stated that he consented to the relief sought herein.

WHEREFORE, Guzman respectfully requests that the Court grant this Motion, thereby rescheduling the Hearing to a date not before May 15, 2023, together with ordering such other and further relief as the Court deems appropriate.

I HEREBY CERTIFY that a true and correct copy of the above and foregoing has been emailed to all on the ECF list on this 3rd day of April, 2023, and I hereby certify that I am admitted to the Bar of the United States District Court of the Southern District of Florida, and I am in compliance with the additional qualifications to practice in this Court as set forth in Local Rule 2090-1(A).

LUBLINER LAW PLLC

By: /s/ Richard Lubliner
Richard S. Lubliner, Esq.
FBN 0047741
1645 Palm Beach Lakes Blvd., Suite 1200
West Palm Beach, Florida 33401
Phone: 561-207-2018
Fax: 561-584-7227
Email: rich@lubliner-law.com
Email: carolina@lubliner-law.com