

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF FLORIDA  
FORT LAUDERDALE DIVISION  
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In re:

Case No.: 22-15714-PDR

POMPANO SENIOR SQUADRON  
FLYING CLUB, INC.,

Chapter 11  
(Subchapter V)

Debtor.

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

POMPANO SENIOR SQUADRON FLYING CLUB, INC. (“Debtor”), 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 June 15, 2023 (the “Hearing”).

4. Undersigned counsel, and counsel for the Debtor, are engaged in settlement discussions that will hopefully result in the resolution of the objection, or at a minimum limiting some of the issues in connection therewith.

5. The parties are exchanging documents and conferring regarding discovery needed, in the event the matter must proceed to an evidentiary hearing.

6. Consequently, Guzman, and the Debtor, respectfully request that the Court set a Status Conference/Pre-Trial conference for a date after August 15, 2023 at which time the Court can set an evidentiary hearing on the remaining contested matters if necessary.

7. Undersigned counsel certifies that he obtained the consent of counsel for Guzman to continue the Hearing.

WHEREFORE, Guzman respectfully requests that the Court grant this Motion, thereby rescheduling the Hearing to a date on or after August 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 June 14, 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).

**LORIUM LAW**

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By: /s/ Craig A. Pugatch

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