

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF FLORIDA  
FORT LAUDERDALE DIVISION  
[www.flsb.uscourts.gov](http://www.flsb.uscourts.gov)

In re:

Case No. 22-15714-PDR

POMPANO SENIOR SQUADRON  
FLYING CLUB, INC.,

Chapter 11  
(Subchapter V)

Debtor.

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**DEBTOR'S STATUS CONFERENCE REPORT PURSUANT TO 11 U.S.C. § 1188(C)**

Pursuant to 11 U.S.C. § 1188(c), Debtor, Pompano Senior Squadron Flying Club, Inc. ("PSSFC" or "Debtor"), by and through undersigned counsel, files this report in connection with the status conference scheduled for August 25, 2022 at 1:30 p.m. and reports as follows:

Since the filing of the petition on July 26, 2022, Debtor, through the offices of the undersigned, has communicated with the Office of the United States Trustee, the Subchapter V Trustee, and has previewed with the Court, that Debtor intends on filing a plan of reorganization that pays all secured claims in full, as provided for by 11 U.S.C. § 1190(3). In addition, Debtor's plan intends to provide a payment to unsecured creditors that is not less than the projected disposable income of the Debtor to be received during the 5-year period beginning on the date that the first payment is due under the plan, as required by 11 U.S.C. § 1129(a)(15), and funded primarily by monthly membership payments.

The debtor intends to object to disputed claims, including improper lien claims, and presently intends to remove pending litigation with its former treasurer (and claimed lien holder) to this District. The Debtor's projected ordinary income will provide sufficient and meaningful payment to valid creditors. The liquidation of valid claims is the Debtor's primary next steps in this case.

Dated this 11<sup>th</sup> day of August, 2022.

**LORIUM LAW**

*Counsel for the Debtor-in-Possession*

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By: /s/ Craig A. Pugatch

CRAIG A. PUGATCH

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via the Court's CM/ECF system and via U.S. Mail to all parties on the attached service list dated this 11<sup>th</sup> day of August, 2022.

By: /s/ Craig A. Pugatch

Craig A. Pugatch

**SERVICE LIST**

**VIA CM/ECF**

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**VIA U.S. Mail**

See attached Mailing Matrix

Label Matrix for local noticing  
113C-0  
Case 22-15714-PDR  
Southern District of Florida  
Fort Lauderdale  
Wed Aug 10 10:22:42 EDT 2022

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Internal Revenue Service  
Compliance Services Insolvency  
STOP 5730  
7850 Southwest 6th Court  
Plantation, FL 33324

Craig A. Pugatch Esq  
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Ft Lauderdale, FL 33301

Addresses marked (c) above for the following entity/entities were corrected as required by the USPS Locatable Address Conversion System (LACS).

Jeffrey Blake  
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The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Sunwood, Inc.

(u)Airworthy Services, LLC

(u)Paul K. Sanchez

(u)Bruce Ayala  
Aviation Legal Counsel  
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Fort Lauderdale

End of Label Matrix	
Mailable recipients	109
Bypassed recipients	4
Total	113