

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

In re:

Case No. 22-15714-PDR

POMPANO SENIOR SQUADRON
FLYING CLUB, INC.,

Chapter 11
(Subchapter V)

Debtor.

**DEBTOR'S MOTION FOR AN EXTENSION OF TIME
TO FILE OBJECTIONS TO CLAIMS**

Debtor, Pompano Senior Squadron Flying Club, Inc. ("PSSFC" or "Debtor"), by and through undersigned counsel and pursuant to Local Rule Number, Rules 3017-2 and 3017-2, files its Motion for an Extension of Time to file Objections to Claims (the "Motion"), and in support thereof, states as follows:

1. On July 26, 2022 (the "Petition Date"), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. [ECF No. 1].
2. Debtor is operating as a debtor-in-possession pursuant to 11 U.S.C. § 1107.
3. On July 24, 2022, PFFSC filed its Plan of Reorganization for Small Business Under Chapter 11 Subchapter V (the "Plan") [ECF 61].
4. Soon after, the court entered an Order Setting Hearing on Confirmation of Subchapter V Plan, etc., (the "Confirmation Order") [ECF 62], and scheduling PSSFC's Confirmation Hearing for December 15, 2022.
5. Pursuant to the Confirmation Order, PSSFC's must have all objections to claims filed with the court Thursday, December 1, 2022.

6. However, the need for PSSFC to object to claims may be resolved by, and will certainly be effected by, confirmation of the plan. Moreover, the Plan (page 3, Claim Objections -Section 5.01), proposes a deadline for PSSFC's to file its objections to claims, which is triggered after 14th days after entry of the Order Confirming Plan is entered on docket ("EOD") which would be an estimated to be around December 30, 2022 based on the confirmation hearing.

7. Accordingly, PSSFC seeks to avoid an inconsistency between a pre-confirmation deadline to object to claims and the deadline set forth in the plan.

8. No creditors or parties will prejudiced by this request to extend time to file objections to claims, but rather, PSSFC's and counsel will use this additional time to reconcile and continue investigating the business operating records as well as determine if it is in the best interest of the estate to object to claims.

9. PSSFC's requests an extended deadline to file objections to claims through and including Friday, December 30, 2022, or with further extensions to be set by court order, including but not limited to an order confirming the Plan of Reorganization.

WHEREFORE, Pompano Senior Squadron Flying Club, Inc., respectfully requests this Honorable Court enter an order granting the extension of time to file objections to claims through and including Friday, December 30, 2022, and grant PSSFC any further relief this Honorable Court deems just and proper.

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished via US Mail to all parties listed on the attached service list and via the Court's NextGen CM/ECF system on the parties that receive this notice by this method dated this 18th day of November, 2022.

Dated this 18th day of November, 2022.

LORIUM, PLLC

Attorneys for Pompano Senior Squadron Flying Club, Inc.

101 NE Third Avenue, Suite 1800

Fort Lauderdale, FL 33301

Telephone: (954) 462-8000

Facsimile: (954) 462-4300

By: /s/ Craig A. Pugatch

CRAIG A. PUGATCH

Florida Bar No.: 653381

capugatch@loriumlaw.com

Label Matrix for local noticing
113C-0
Case 22-15714-PDR
Southern District of Florida
Fort Lauderdale
Fri Nov 18 12:19:32 EST 2022

Pompano Senior Squadron Flying Club, Inc.
1421 South Ocean Boulevard
Suite 102
Pompano Beach, FL 33062-7314

Aaron Gillespie
819 NE 14th Ct
Ft lauderdale, FL 33304-1215

Air Power, Inc.
4912 S. Collins Street
Arlington, TX 76018-1135

Airworthy Services, LLC
969 SE 6th Terrace
Pompano Beach, FL 33060-9401

Airworthy Services, LLC
c/o Ronald Ziller, President
969 SE 6th Terrace
Pompano Beach, FL 33060-9401

Alessandro Potenti
1410 Middle River Drive
Fort Lauderdale, Florida 33304-1526

Allan Sefranek
336 N. Birch Road
8E
Ft Lauderdale, FL 33304-4202

Alon Rosenberg
1375 SW 14th Avenue
Boca Raton, FL 33486-5326

Andrew Bilukha
12629 NW 13th Court
Sunrise, FL 33323-3155

Andrew Cohen
1314 E Los Olas Boulevard, Suite 9
Ft Lauderdale, FL 33301-2334

Anthony Ard
240 SE 28th Way
Pompano Beach, FL 33062-5437

Anthony Astray-Caneda
20976 Up Town Avenue
Apartment 410
Boca Raton, FL 33428-6576

Anthony Tranchida
4974 NW 48th Avenue
Coconut Creek, FL 33073-4937

Ara Yanikian
4144 NW 83rd Lane
Coral Springs, FL 33065-1316

Arthur J. Gallagher Risk Management
Services, Inc.
2580 Foxfield Road
Suite 203
Saint Charles, IL 60174-1409

Arthur J. Gallagher Risk Management
Services, Inc.
c/o Gallagher Aviation
2580 Foxfield Road, Suite 203
Saint Charles, IL 60174-1409

Bernardo Picca
168 Orange Drive
Boynton Beach, FL 33436-1844

Brain Butzer
19721 118th Trail South
Boca Raton, FL 33498-6506

Bruce Ayala
6835 NW 22nd Terrace
Fort Lauderdale, FL 33309-1426

Bruce Knecht
2130 NE 30th Street
Lighthouse Point, FL 33064-7631

Carl L. J+Kennedy, II
2929 S. Ocean Boulevard
Suite 510
Boca Raton, FL 33432-8323

Carl L. Kennedy, II
2929 S. Ocean Boulevard
Suite 510
Boca Raton, FL 33432-8323

Carson Reddick
100 N. Federal Highway
Ft Lauderdale, FL 33301-1129

Casey Ahlbum
10375 NW 39th Manor
Coral Springs, FL 33065-1523

Cesar Hernandez
16711 Sapphire Isle
Weston, FL 33331-3168

Charly J Guzman
980 N Federal Highway Suite 110
c/o Kennedy & Goard LLC
Boca Raton, FL 33432-2704

Christopher Troesch
2500 N. Ocean Boulevard
Pompano beach, Fl 33062-2942

Corey Pechonis
770 SE 2nd Avenue
Apartment F-206
Deerfield Beach, FL 33441-5421

Darren Ayoub
205 Woodland Road
Palm Springs, FL 33461-1068

Dave Davison
205 SW 28th Street
Fort Lauderdale, FL 33315-3131

David Watkins
1012 Kanagowa Drive
Brevard, NC 28712-9094

Donald Cannarozzi
204 SE 9th Street
Dania Beach, FL 33004-4439

Donald McNeil
2720 NE 6th Street
Pompano Beach, FL 33062-4929

Edwin Thompson Orcino
4960 Windward Way
Ft Lauderdale, FL 33312-5221

Erica K. Ramos, Esq.
110 SE 6th Street,
17th Floor
Fort Lauderdale, FL 33301-5047

Evan Munro
353 W 47th Street
Apartment 4H
Miami Beach, Florida 33140-3106

Gamma Dean
1708 Las Olas Boulevard
Ft Lauderdale, FL 33312-7517

Gene Vertkin
1039 Hillsboro Mile #2
Hillsboro Beach, FL 33062-2104

Gerard Williams
5800 SW 130th Avenue
Southwest Ranches, FL 33330-3108

Giancarlo Daneri
1201 River Reach Drive
Apartment 404
Ft Lauderdale, FL 33315-1180

Gideon Brent
140 SW 7th Court
Pompano Beach, FL 33060-8398

Gregory Galyo
4496 SW 37th Avenue
Fort Lauderdale, FL 33312-5402

Gregory Gilhooly
5773 NW 119th Terrace
Coral Springs, Florida 33076-4031

Gregory Madonna
411 N New River Drive East
Apartment 2006
Ft Lauderdale, FL 33301-3181

Harry Pollack
2810 NE 20th Avenue
Lighthouse Point, Fl 33064-7606

Henryk Dabrowski
3004 Oakbrook Drive
Weston, FL 33332-3418

(p) INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATIONS
PO BOX 7346
PHILADELPHIA PA 19101-7346

Internal Revenue Service
PO Box 7346
Philadelphia, PA 19101-7346

JPMorgan Chase Bank, N.A.
s/b/m/t Chase Bank USA, N.A.
c/o Robertson, Anschutz & Schneid, P.L.
6409 Congress Avenue, Suite 100
Boca Raton, FL 33487-2853

Jameson Clifford
2740 NE 9th Court
Pompano Beach, FL 33062-4209

Jason Costello
301 SW 1st Ave
Ft Lauderdale, FL 33301-4342

Jason Sager
5301 Magellan Circle
Aventura, FL 33180

Jay Heppner
3212 NE 40th Street
Ft Lauderdale, FL 33308-6410

Jean-Claude Conte
3507 Oaks Way
Apartment 101
Pompano Beach, FL 33069-5339

(c)JEFFREY BLAKE
1961 WATERS EDGE
POMPANO BEACH FL 33062-7691

Jeffrey Ronner
6512 Burning Wood Drive
Apartment 210
Boca Raton, FL 33433-5134

Jorge Salinger
2701 N. Ocean Boulevard
E605
Boca Raton, FL 33431-7045

Jose Hernandez
4442 E Aqua Bella Lane
Fort Lauderdale, FL 33312-5651

Juan Ramirez
2211 NE 15th Court
Ft Lauderdale, FL 33304-1417

Julian Hernandez
321 NW 17th Avenue
Pompano Beach, FL 33069-2867

Justin Armstrong
3391 Liberty Street
Hollywood, FL 33021-4334

Kevin MacLean
209 River Terrace Drive
Jupiter, FL 33469-2945

Kevin Prior
53 Castlerock Lane
Bolton, CT 06043-7856

Kevin Tracey
1044 SW 42nd Avenue
Dearfield Beach, FL 33442-8254

Killian O'Connor
200 S Birch Road
Apartment 810
Ft lauderdale, FL 33316-1536

Law Office of Dane Stanish, P.A.
c/o Dane T. Stanish, Esq.
3475 Sheridan Street, Suite 209
Fort Lauderdale, FL 33301

Law Offices of Edward F. Holodak, PA
c/o Edward F. Holodak, Esq.
3326 NE 33rd Street
Fort Lauderdale, FL 33308-7110

Logan Anderson
2625 NE 17th Street
Pompano Beach, FL 33062-3212

Luca Pastore
2615 NE 21st Terrace
Lighthouse Point, FL 33064-7740

Marissa Stutes
4315 Sarver Drive
lake Charles, LA 70605-4421

Mark Jarvis
140 SE 9th Street
Pompano Beach, FL 33060-8849

Michael Borer
c/o Jeffrey B. Lampert, Esq.
The Barrister Building
1615 Forum Place, Suite 4-B
West Palm Beach, FL 33401-2317

Michael Dubin
6171 Floral Lakes Drive
Delray Beach, FL 33484-4606

Michael Scheeringa
517 SE 25th Avenue
Ft Lauderdale, FL 33301-2615

Michael Strongin
9559 Collins Avenue
Apartment 409
Surfside, FL 33154-2657

Michael Taggart
2801 Florida Avenue
Apartment 215
Miami, FL 33133-1908

Mosart Sebben
7676 NW 60th Lane
Parkland, FL 33067-3321

Office of the US Trustee
51 S.W. 1st Ave.
Suite 1204
Miami, FL 33130-1614

Ori Adivi
3218 NE 211 Terrace
Aventura, FL 33180-3688

Paul K. Sanchez
10643 Shore Drive
Boca Raton, FL 33428-5645

Paul K. Sanchez
Boca Raton, FL 33428

Paul K. Sanchez
c/o Robert J. Puzio, Esq.
The Litigation Defense Group, Inc.
1040 Bayview Drive, Suite 520
Fort Lauderdale, FL 33304-2506

Paul Nudelman
2301 Collins Avenue
Penthouse 1
Miami Beach, FL 33139-1603

Paul Palmeri
1475 SE 15th Street
Apartment 301
Fort Lauderdale, FL 33316-4706

Paul Sanchez
10643 Shore Drive
Boca Raton, FL 33428-5645

Paulo De lima Yoshida
1160 N. Federal Highway
Apartment 1016
Ft Lauderdale, FL 33304-1436

Raja Malek
714 Heron Drive
Delray Beach, FL 33444-1924

Randy Greenfield
3305 NE 39th Street
Fort Lauderdale, FL 33308-6440

Rick McQuaide
1518 SE 12th Court
Dearfield Beach, FL 33441-7110

Robert Brauser
90 Compass Lane
Ft Lauderdale, FL 33308-2010

Robert Nast
3165 NE 48th Court
Lighthouse Point, FL 33064-7975

Robert Rutten
101 Briny Avenue
Apartment 1002
Pompano Beach, FL 33062-5615

Robert Schneider
9838 Savona Winds Drive
Delray, FL 33446-9765

Ronald Ziller
969 SE 6th Terrace
Pompano Beach, FL 33060-9401

SEC Commision
Office of Reorganization
950 E. Paces Ferry Road NE
Suite 900
Atlanta, GA 30326-1382

Sarasota Avionics & Maintenance
120 Airport Avenue West
Venice, FL 34285-3921

Sheltair Pompano Beach, LLC
4860 NE 12th Avenue
Fort Lauderdale, FL 33334-4804

Stephen Horniacek
1790 SE 4th Street
Pompano Beach, FL 33060-7602

Stephen Taylor
1334 N 30th Road
Hollywood 33021-5004

Sunwood, Inc.
Susan D. Lasky, PA
c/o Susan D. Lasky, Esq.
320 SE 18th Street
Fort Lauderdale, FL 33316-2818

Sunwood, Inc.
c/o Dana Stanish, Esq.
Law Offices of Dane Stanish, P.A.
3475 Sheridan Street, Suite 209
Hollywood, FL 33021-3659

The Law Office of Stephen Barker
901 A Clint Moore Road
Boca Raton, FL 33487-2876

The Law Offices of Scott J. Kalish, PLLC
c/o Scott J. Kalish, Esq.
2161 Palm Beach Lakes Boulevard
West Palm Beach, FL 33409-6612

Timothy Rosman
1548 NE 37th Street
Oakland Park, FL 33334-4623

Toby Rothe
1401 S Ocean Boulevard
Apartment 504
Pompano Beach, FL 33062-7386

Tom Warfield
4900 N. Ocean Boulevard
Unit 403
Ft. Lauderdale, FL 33308-2931

Tor Holm
2351 SW 26th Avenue
Fort Lauderdale, FL 33312-4536

Travis McQuade
14861 Enclave Preserve Circle
#T4
Delray Beach, FL 33484-8827

Yonathan Yehezkel
54 NE 95th Street
Miami Shores, FL 33138-2707

Carl Kennedy
c/o Kaniuk Law Office, P.A.
1615 S. Congress Avenue
Suite 103
Delray Beach, FL 33445-6326

Carol Lynn Fox
200 East Broward Blvd Suite 1010
Ft Lauderdale, FL 33301-1943

(p)RICE PUGATCH ROBINSON STORFER & COHEN PLL
ATTN C/O CRAIG A PUGATCH ESQ
101 NE 3RD AVENUE
SUITE 1800
FORT LAUDERDALE FL 33301-1252

Edward F Holodak
7951 SW 6 St #210
Plantation, FL 33324-3276

Jason Slatkin Esq.
Lorium Law
101 NE 3rd Avenue Suite 1800
Fort Lauderdale, FL 33301-1252

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

Craig A. Pugatch Esq
101 NE 3 Ave #1800
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
1961 SE 18th Street
Lauderdale By The Sea, FL 33062

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

(du)Paul K. Sanchez

(u)Bruce Ayala
Aviation Legal Counsel
110 SE 6th Street, 17th Floor
Fort Lauderdale

(du)Paul K Sanchez

End of Label Matrix
Mailable recipients 114
Bypassed recipients 6
Total 120