

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.

**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.

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