

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.

**EX-PARTE APPLICATION FOR EMPLOYMENT OF RAYMOND C.  
CAHILL, CPA AND RAYMOND C. CAHILL, CPA, PA, AS  
ACCOUNTANT TO THE DEBTOR EFFECTIVE NOVEMBER 1, 2022**

Debtor in Possession, Pompano Senior Squadron Chapter 11 flying Club, Inc. (the “Debtor”), by and through undersigned counsel and pursuant to 11 U.S.C. § 327(e) and Federal Rule of Bankruptcy Procedure 2014 and Local Rules 2014-1 and 9013-1(C)(3), files this *Application* requesting an order on an *ex parte* basis as permitted by Local Rule 9013-1(C)(3), authorizing the employment of Raymond C. Cahill, CPA and Raymond C. Cahill, CPA, PA (collectively, “Cahill”), as accountant to Debtor effective as of November 1, 2022, to assist the Debtor in the matter set forth herein and as grounds therefore, Debtor 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. [Doc. 1].
2. Debtor is operating as a debtor-in-possession pursuant to 11 U.S.C. § 1107.
3. Debtor is a tax exempt, not-for-profit entity that operates a flying club for the benefit of its members, which includes the ownership, operation and lease of aircraft flown by its members.
4. The Debtor’s maintains an office located at 1421 S. Ocean Boulevard, Suite 102, Pompano Beach, Florida and leases hanger space at the Executive Airport in Pompano Beach,

Florida.

5. The Debtor receives substantially all of its income from membership dues and fees for use of the club's aircraft.

6. Debtor is in need of accounting services to assist it with the filing of necessary documents with respect to its tax exempt status, required tax returns, and preparation of financial statements and reports related to tax preparation, all as set forth in the engagement letter attached hereto as **Exhibit "A"**.

7. Cahill is qualified to perform the services contemplated hereunder and to advise the Debtor with regards to the matters for which Cahill is to be engaged.

8. Debtor submits that Cahill's background, knowledge and expertise in the area of accounting is necessary to assist Debtor in the administration of this case.

9. Accordingly, Debtor seeks to employ Cahill as accountant in this bankruptcy case for the purpose of providing the accounting services set forth in Exhibit A and described above.

10. In order to hire a professional such as an accountant, a debtor needs to demonstrate that "the professional be disinterested and that they not hold an interest adverse to the estate." *In re E. Charter Tours*, 167 B.R. 995, 996 (Bankr. M.D. Ga. 1994); see also *United States Tr. v. Andover Togs, Inc. (In re Andover Togs, Inc.)*, 2001 U.S. Dist. LEXIS 2690, at \*17 (S.D.N.Y. Mar. 13, 2001) (quoting *E. Charter Tours*).

11. As set forth in the *Declaration of Proposed Accountant for Debtor* executed by Raymond C. Cahill, CPA, attached to this *Application* as **Exhibit "B"**, Cahill does not hold or represent any interest adverse to the Debtor or the bankruptcy estate for the matters for which Cahill is to be retained.

16. As such, the Debtor requests that an order approving this *Application*.

17. Applicant's services will be provided on an hourly basis and subject to the filing and approval of fee applications before this Court.

WHEREFORE, the Debtor respectfully requests the entry of an order substantially in the form of Order attached as **Exhibit "C"** approving this *Application*, authorizing the retention of Cahill as accountant to the Debtor effective as November 1, 2022, and grant Debtor any further relief this Honorable Court deems just and proper.

Dated this 22<sup>nd</sup> day of November, 2022.

**LORIUM LAW**

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served to all parties listed below via email through the court's CM/ECF system and on this 22<sup>nd</sup> day of November, 2022.

/s/ Jason E. Slatkin

Jason E. Slatkin

**SERVICE LIST**

**VIA CM/ECF**

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