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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.

_____ /

AFFIDAVIT OF CREDITOR CHARLY J. GUZMAN
AND MOTION FOR CONTINUANCE

EVENT 81

OBJECTION TO CLAIM.

I, Charly J. Guzman, a creditor in this action, hereby respectfully state as follows:

1. I am the affiant and have personal knowledge of the facts stated herein.
2. I made a loan to the Debtor in the amount of \$100,000 in 2017 through its agent, Carl Kennedy (who is also my accountant), and was promised repayment.
3. The money I loaned to the Debtor was deposited into the Debtors bank account and used by the Debtor for its purposes.
4. I asked my accountant, Carl Kennedy, to file a claim in this action on my behalf for the monies I loaned to the Debtor.
5. I was unaware that it was improper for my accountant to file a claim on my behalf in this bankruptcy action.
6. The Debtor will be improperly and unjustly enriched if this court discharges or strikes my claim.
7. I am requesting a continuance to respond to the objection to my claim which was filed by the Debtor, so that I may retain counsel (I have contacted Richard Lubiner,

who is in a deposition on the Hearing date of December 15, 2022) to protect my interests in this matter.

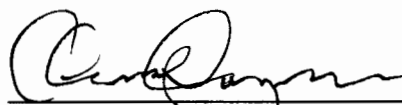
8. The Debtor will not be prejudiced if this matter is continued for 30 days so I can hire an attorney.

WHEREFORE, I respectfully request a 30-day continuance for the purpose of hiring counsel to represent me in this matter and protect my claim against the Debtor.

Under penalties of perjury, I declare that I have read this document and the facts stated in it are true.

CERTIFICATE OF SERVICE

I sent a copy, either by USPS or e-mail, of this document to all counsel in this matter, including Craig Pugatch, Esq. (attorney for the Debtor) and Carolyn Fox (Trustee) on December 13, 2022.



CHARLY J. GUZMAN
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