

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF FLORIDA  
FT. LAUDERDALE DIVISION  
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IN RE:

POMPANO SENIOR SQUADRON  
FLYING CLUB, INC.,

Case Number 22-15714-PDR  
Chapter 11

DEBTOR

\_\_\_\_\_ /

POMPANO SENIOR SQUADRON  
FLYING CLUB, INC.,

Plaintiff,

Adv Case Number 22-01236-PDR

vs.

CARL KENNEDY,

Defendant.

\_\_\_\_\_ /

**AGREED MOTION TO CONTINUE STATUS CONFERENCE**

Defendant, Carl Kennedy (“Defendant”), by and through undersigned counsel, files this Agreed Motion to Continue the Status Conference currently scheduled to occur on February 15, 2023 (the “Motion”), and in support thereof, states as follows:

1. Undersigned counsel was recently retained by Defendant in connection with representing him in this adversary proceeding.
2. A Status Conference is currently scheduled to occur in this proceeding on Wednesday, February 15, 2023.
3. The Status Conference was scheduled prior to undersigned counsel appearing in this proceeding, and he had no notice of same until Saturday, February 11, 2023.

4. Undersigned counsel will be out of the country on February 15, 2023, and, therefore, is unable to participate in the Status Conference as currently scheduled.

5. Undersigned counsel, and Debtor's counsel, have a conference call scheduled for February 14, 2023, during which call they will be discussing what they believe to be appropriate deadlines in this proceeding so that they are prepared to present same to the Court when the rescheduled Status Conference Defendant is seeking by this Motion occurs.

6. Consequently, undersigned counsel respectfully requests that the Status Conference be rescheduled.

7. Undersigned counsel certifies that he obtained the consent of Defendants, and Debtor's counsel, prior to filing this Motion.

WHEREFORE, Defendant respectfully requests that the Court grant this Motion, rescheduling the Status Conference to a future date, together with ordering such other and further relief as the Court deems appropriate.

I HEREBY CERTIFY that a true and correct copy of the above and foregoing has been emailed to all on the ECF list on this 13<sup>th</sup> day of February, 2023, and I hereby certify that I am admitted to the Bar of the United States District Court of the Southern District of Florida, and I am in compliance with the additional qualifications to practice in this Court as set forth in Local Rule 2090-1(A).

LUBLINER LAW PLLC

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