

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

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.

_____/

JOINT EX-PARTE 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 April 19, 2023 (the “Motion”), and in support thereof, states as follows:

1. A Status Conference is currently scheduled to occur in this proceeding on Wednesday, April 19, 2023.
2. Defendant's counsel, and Debtor’s counsel, have been diligently working on this matter and 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.

3. The Parties are conferring on selection of a mediator and the Parties suggest that mediation would occur within 60 days along with the contested matter on creditors claim.

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

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

6. Undersigned further requests that the Court enter its initial pretrial order since this case was removed and the order was not initially entered in connection with the commencement of the case.

WHEREFORE, the Parties respectfully requests that the Court grant this Motion, rescheduling the Status Conference to a future date, enter the initial pretrial scheduling order together with such other and further relief as the Court deems appropriate.

Dated this 14th day of April, 2023.

LORIUM LAW

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By: /s/ Craig A. Pugatch

CRAIG A. PUGATCH

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Proposed Order

UNITED STATES BANKRUPTCY COURT
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ORDER GRANTING THE JOINT EX-PARTE AGREED MOTION TO CONTINUE STATUS CONFERENCE

This matter came before the Court upon the *Joint Ex-Parte Agreed Motion to Continue Status Conference* (the “Motion”) [ECF ___]. Having reviewed the Motion and the relief requested therein, and being advised of the agreement of the parties, the Court,

ORDERS,

1. The Motion is **GRANTED**.
2. The Status Conference Hearing shall be held _____, 2023 at _____, at the United States Bankruptcy Court, 299 East Broward Blvd., Courtroom 301, Fort Lauderdale, FL 33301. Although the court will conduct the hearing in person, the Courts webpage (<https://www.flsb.uscourts.gov/judges/judges-peter-d-russin>) has specific guidelines regarding requirements and procedures for appearing remotely.

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Submitted to:

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(Attorney Pugatch is directed to serve a copy of this order on all interested parties as listed on the court's mailing matrix and is required to file a certificate of service with the court)