

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., a Florida
corporation,

Chapter 11
(Subchapter V)

Debtor.

POMPANO SENIOR SQUADRON
FLYING CLUB, INC., a Florida
corporation,

Adv Proc. No. 22-01236-PDR

Plaintiff,

v.

CARL KENNEDY, individually,

Defendant.

AGREED EX-PARTE MOTION TO CONTINUE STATUS CONFERENCE

Plaintiff POMPANO SENIOR SQUADRON FLYING CLUB, INC. along with the agreement of Defendant CARL KENNEDY, respectfully requests that the Court continue the status conference in this matter for a period of 60 days to permit the completion of mediation, and in support of the agreed upon relief state:

1. Following confirmation of the plan, the Court denied abstention in this removed adversary proceeding.

2. At this last status conference, this matter was set for a continued status conference to permit the parties to conduct and conclude mediation before proceeding with pre-trial deadlines and litigation.

3. The continued status conference is set for June 21, 2023. (ECF
4. Following scheduling with the parties and the mediator, mediation has been scheduled for June 27, 2023. Notice of Mediation has been filed with the Court (ECF 21).
5. The parties request that the Court continue the Scheduling Conference to permit the scheduled mediation to be conducted in advance of the continued hearing. To the extent that the mediation does not resolve the matter, the parties will be in a position to narrow the dispute as well to discuss scheduling for any matters remaining in this adversary proceeding following confirmation and substantial consummation of the plan as well as mediation.

WHEREFORE, the Plaintiff respectfully requests that the Court grant this Motion, rescheduling the Scheduling Conference to a date on or after August 15, 2023, 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 June 19, 2023.

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