

UNITED STATES BANKRUPTCY COURT FOR THE
SOUTHERN DISTRICT OF FLORIDA
FT. LAUDERDALE DIVISION
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Case No.: 18-19121-BKC-RBR
Chapter 11
Jointly Administered

In re:

1 GLOBAL CAPITAL LLC, *et al.*;

Debtor;

EX-PARTE MOTION TO SHORTEN TIME FOR DISCOVERY

Daniel M. McDermott, United States Trustee for Region 21, moves this Court for an order shortening the time to respond to discovery, and states:

1. On July 27, 2018, 1 Global Capital, LLC and 1 West Capital, LLC, (“Debtors”) filed petitions for relief under chapter 11 of the Bankruptcy Code. These cases are jointly administered.

2. On September 7, 2018, the United States Trustee appointed the Committee of Unsecured Creditors (“Committee”).

3. On October 4, 2018, the Committee filed an *Application of Official Committee of Unsecured Creditors to Retain and Employ Stitcher, Riedel, Blain & Postler, P.A., as Counsel, Nunc Pro Tunc to September 11, 2018* (“Application”) (ECF # 177). The United States Trustee objected to the Application (ECF # 202), and raised issues concerning the adequacy of the disclosures in the Application.

4. At the hearing, the Court heard the concerns raised by the United States Trustee, granted the Application on an *interim* basis and scheduled a hearing on the Application 60 days from the date of the hearing to allow the United States Trustee to conduct discovery concerning

the issues raised in the objection.

5. In order for the United States Trustee to conduct most, if not all discovery, by the next scheduled hearing, the United States Trustee has propounded discovery on several parties and it is currently propounding Interrogatories and Request for Production of Documents upon certain members of the Committee.

6. Unless this Court shortens the time to respond to such discovery, there will be insufficient time after the parties respond for the United States Trustee to adequately review such responses and prepare for the hearing.

7. This relief is being sought *ex-parte* pursuant to Bankruptcy Local Rule 9013-1(c)(7). However, should the Court prefer to hold a hearing on this matter, the United States Trustee requests that the hearing be scheduled on an expedited basis.

WHEREFORE, the United States Trustee requests this Court to enter an Order shortening to fifteen (15) days the time for the parties listed in this Motion to respond to the Interrogatories, attend any scheduled deposition, produce requested documents and for such other relief as may be just and proper.

I HEREBY CERTIFY that I am admitted to the Bar of the United States District Court for the Southern District of Florida and that I am in compliance with all additional qualifications to practice before this Court as set forth in Local Rule 2090-1(A).

Dated: November 15, 2018

DANIEL M. McDERMOTT
United States Trustee
Region 21

/s/ Damaris Rosich-Schwartz
Damaris Rosich-Schwartz
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of this Objection was sent on November 15, 2018, as follows:

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All Other Parties listed on the Electronic Service List via U.S. Mail

Dated: November 15, 2018.

DANIEL M. McDERMOTT
United States Trustee
Region 21

/s/ Damaris Rosich-Schwartz
Damaris Rosich-Schwartz, Esq.