

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

In re:

Case No. 8-24-bk-00676-RCT

THE CENTER FOR SPECIAL NEEDS
TRUST ADMINISTRATION, INC.,

Chapter 11

Debtor.

**AGREED MOTION TO EXTEND BRIEFING SCHEDULING
DEADLINES FOR MOTION TO ENFORCE AUTOMATIC STAY**

Michael Goldberg, the Chapter 11 Trustee (“Chapter 11 Trustee”), by and through undersigned counsel, submits this Agreed Motion (the “Motion”) to Extend Briefing Schedule Deadlines for the Motion to Enforce Automatic Stay filed by the Chapter 11 Trustee (the “Stay Motion”) (Doc. 195) and in support, would show the Court as follows:

1. On May 21, 2024, this Court entered an Order Granting Chapter 11 Trustee's Motion to Set Briefing Schedule and Final Hearing on Motion to Enforce Automatic Stay (Doc. 227) (the “Scheduling Order”).
2. The Scheduling Order set the deadline as May, 24, 2024, for the Chamberlin Class Action Plaintiffs to file their objection to the Stay Motion.
3. Additionally, the Scheduling Order set the deadline as May 30, 2024, for the Chapter 11 Trustee to file his reply to both the Chamberlin Class Action Plaintiffs' and American Momentum Bank's (“AMB”) objections to the Stay Motion.
4. By this Motion, on an agreed basis, the Chapter 11 Trustee seeks entry of an order substantially in the form attached as **Exhibit A** revising the Scheduling Order to extend the deadline to May 31, 2024, for the Chamberlin Class Action Plaintiffs to file their objection to the Stay

Motion and to extend the Chapter 11 Trustee's deadline June 7, 2024 to file his reply to the Chamberlin Class Action Plaintiffs' and AMB's objections to the Stay Motion.

5. Counsel for the Chapter 11 Trustee has conferred with counsel for the Chamberlain Class Action Plaintiffs, counsel for AMB, the Official Unsecured Creditors Committee, and the U.S. Trustee, and all the aforementioned consent to the relief requested herein.

6. The extension of the briefing schedule is requested in good faith and not for the purpose of delay. The additional time will enable the parties to continue their good faith settlement discussions in an attempt to resolve the issues set forth in the Stay Motion.

WHEREFORE, the Chapter 11 Trustee requests this Court enter an order substantially in the form attached hereto as **Exhibit A** (i) granting the Motion, (ii) extending the deadline to May 31, 2024, for the Chamberlin Class Action Plaintiffs to file their objection to the Stay Motion; (iii) extending the deadline to June 7, 2024, for the Chapter 11 Trustee to file his reply to the Chamberlin Class Action Plaintiffs' and AMB's objections to the Stay Motion, and (iv) granting such other and further relief as the Court deems just and proper.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 24, 2024, I filed a true and correct copy of the foregoing with the United States Bankruptcy Court for the Middle District of Florida using the Court's CM/ECF system, which will serve copies on all counsel of record. Additionally, Epiq Corporate Restructuring, LLC will cause a true and correct copy of the foregoing document to be served on all parties required to be served, including (i) the Class Action Plaintiffs and Class Action Defendants and (ii) the Local Rule 1007-2 Parties in Interest List.

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/s/Steven R. Wirth

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Exhibit A

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

In re:

Case No. 8-24-bk-00676-RCT

THE CENTER FOR SPECIAL NEEDS
TRUST ADMINISTRATION, INC.,

Chapter 11

Debtor.

**ORDER GRANTING AGREED MOTION TO EXTEND BRIEFING
SCHEDULING DEADLINES FOR MOTION TO ENFORCE AUTOMATIC STAY**

THIS MATTER came before the Court on the *Agreed Motion to Extend Briefing Schedule Deadlines for the Motion to Enforce Automatic Stay* (“Motion”) (ECF No. ____) and the Court, having considered the Motion, and the agreement of the parties to the relief requested in the Motion, finds good cause exists to grant the Motion, and it is:

ORDERED:

1. The Motion is **GRANTED**.
2. The deadline for Chamberlin Class Action Plaintiffs to file their objection to the Stay Motion is extended to May 31, 2024.
3. The deadline for the Chapter 11 Trustee to file his reply to the Chamberlin Class Action Plaintiffs' and AMB's objections to the Stay Motion is extended to June 7, 2024.

Steven R. Wirth, Esq. is directed to serve a copy of this order on interested parties who do not receive service by CM/ECF and file a proof of service within three days of entry of this order.