

UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
WEST PALM BEACH DIVISION

IN RE: : CHAPTER 11  
:   
MV REALTY PBC, LLC, : CASE NO. 23-17590-EPK  
: (Jointly Administered)  
Debtors. :

**UNITED STATES TRUSTEE'S AGREED EX-PARTE MOTION TO CONTINUE  
HEARING ON EPIQ RESTRUCTURING, LLC'S MOTION FOR THE ALLOWANCE  
AND PAYMENT OF SECTION 503(b)(1)(A) AMENDED ADMINISTRATIVE CLAIM**

COMES NOW the United States Trustee for Region 21 (the "United States Trustee"), in furtherance of the administrative responsibilities imposed pursuant to 28 U.S.C. §586(a) respectfully requests the Court to continue the July 10, 2024, hearing on *Epiq Restructuring, LLC's Motion for Allowance and Payment of Section 503(b)(1)(A) Amended Administrative Claim* (the "Epiq Motion," ECF #1586). In support thereof, the United States Trustee shows as follows:

1. Debtors commenced cases under Chapter 11 of the Bankruptcy Code on September 22, 2023.
2. Pursuant to the *Order Granting Debtors' Emergency Motion for Entry of Order Authorizing Debtors to Employ Epiq Restructuring, LLC as Notice, Claims and Solicitation Agent, and Call Center Operator, as Such Services May be Necessary and Required, Effective September 22, 2023* (ECF ## 63 and 67), Epiq Restructuring, LLC was obligated to take various actions in these Chapter 11 cases.
3. On May 24, 2024, the Court entered its order dismissing the Chapter 11 cases and retaining jurisdiction to review and approve fee applications and administrative expense claims (ECF #1523).
4. On June 14, 2024, the Epiq Motion was filed. The hearing on such motion is

currently scheduled for July 10, 2024.

5. As part of her obligations to review the Epiq Motion, the United States Trustee, through the undersigned counsel, has reviewed the request and is in discussions with Epiq Restructuring, LLC, regarding the completion of its obligations under the agreement approved by the Court.

6. To attempt to resolve these issues, the United States Trustee has requested and Epiq Restructuring, LLC has agreed to a three-week continuation of the July 10 hearing to allow the parties to try and resolve the United States Trustee's concerns.

7. The United States Trustee requests the Court continue the hearing on the Epiq Motion for a period of three weeks to July 31, 2024.

WHEREFORE, the upon agreement of the parties, the United States Trustee respectfully requests this Court to enter an order resetting the hearing on the Epiq Motion to July 31, 2024, or immediately thereafter and granting any other or further relief it deems just and proper.

MARY IDA TOWNSON  
United States Trustee  
Region 21

/s/  
HEIDI A. FEINMAN  
Assistant United States Trustee  
Florida Bar No. 0879460

Office of the U.S. Trustee  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the **UNITED STATES TRUSTEE'S AGREED EX-PARTE MOTION TO CONTINUE HEARING ON EPIQ RESTRUCTURING, LLC'S MOTION FOR THE ALLOWANCE AND PAYMENT OF SECTION 503(b)(1)(A) AMENDED ADMINISTRATIVE CLAIM** was electronically filed with the Court using the CM/ECF system, which sent notification to all parties of interest participating in the CM/ECF system and sent via U.S. Mail, First Class to the following parties:

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

DONE this the 3<sup>rd</sup> day of July, 2024.

/s/  
HEIDI A. FEINMAN  
Assistant United States Trustee