

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION
<https://www.flsb.uscourts.gov/>

In re:

Case No. 23-17590-EPK

MV Realty PBC, LLC,

Chapter 11

Debtor.

(Jointly Administered)

**UNITED STATES TRUSTEE'S *EX-PARTE* AGREED
MOTION TO CONTINUE HEARING ON SECOND INTERIM AND FINAL
APPLICATION FOR ALLOWANCE AND PAYMENT OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES OF SAUL EWING LLP, AS SPECIAL COUNSEL
TO THE DEBTORS, FOR THE PERIOD OF OCTOBER 3, 2023, THROUGH MAY 24, 2024**

Mary Ida Townson, the United State Trustee for Region 21 (the “UST”), respectfully requests the Court to continue the hearing on the *Second Interim and Final Application for Allowance and Payment of Compensation and Reimbursement of Expenses of Saul Ewing LLP, as Special Counsel to the Debtors, for the Period of October 3, 2023, Through May 24, 2024* [ECF No. 1590] (the “Fee Application”) filed by Saul Ewing LLP (“Saul Ewing”), which is scheduled for July 10, 2024, at 2:00 p.m., to July 31, 2024, at 1:30 p.m., and states as follows in support:

1. MV Realty, PBC, LLC, and the jointly administered debtors (the “Debtors”), commenced cases under chapter 11 of the Bankruptcy Code on September 22, 2023.

2. The Debtors filed their emergency application to employ Saul Ewing as special counsel for the Debtors in various state actions, as well as other regulatory and investigative matters on October 3, 2023 [ECF No. 53].

3. The Court granted the emergency application to employ Saul Ewing on October 20, 2023 [ECF No. 107] (the “Order Approving Employment”).

4. On May 24, 2024, the Court issued an order dismissing the Debtors’ bankruptcy cases but retained jurisdiction to review and approve fee applications and administrative expense

claims [ECF No. 1523].

5. On June 14, 2024, Saul Ewing filed its Fee Application, which is currently scheduled to be heard on July 10, 2024 at 2:00 p.m.

6. The UST is in the process of reviewing the Fee Application and has requested additional documents from Saul Ewing to complete her review of the Fee Application.

7. Saul Ewing indicated that certain requested documents may not be available until a date after the July 10, 2024, hearing and has agreed to a continuance of the hearing on the Fee Application to July 31, 2024.

8. Accordingly, the UST requests the Court continue the hearing on the Fee Application to July 31, 2024, at 1:30 p.m.

WHEREFORE, the upon agreement of the parties, the UST respectfully requests this Court to enter an order rescheduling the hearing on the Fee Application to July 31, 2024, at 1:30 p.m., and granting any further relief it deems just, equitable, and proper.

Dated: July 9, 2024

Mary Ida Townson
United States Trustee for Region 21

/s/ John Schank
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* I hereby certify that I am admitted to the Bars of the States of Georgia and New York and that I am excepted from additional qualifications to practice in this Court pursuant to Local Rule 9011-4 pertaining to attorneys representing the United States government.

CERTIFICATE OF SERVICE

I certify that the foregoing document was electronically filed with the Court on July 9, 2024, using the CM/ECF system, which sent notification to all parties of interest participating in the CM/ECF system for this case as shown below:

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