

**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 CONTINUE PRELIMINARY HEARING ON
CHAPTER 11 TRUSTEE’S MOTION FOR AUTHORITY TO REIMBURSE
EXPENSES FOR SHYLAH JAMES FRAZIER DISCRETIONARY TRUST**

Michael Goldberg, the Chapter 11 Trustee (“Chapter 11 Trustee”) requests that the Court continue the May 1, 2025 preliminary hearing on the Chapter 11 Trustee’s Motion for Authority to Reimburse Expenses for Shylah James Frazier Discretionary Trust, and in support, would show the Court as follows:

1. On April 2, 2025, the Chapter 11 Trustee filed his Motion for Authority to Reimburse Expenses for Shylah James Frazier Discretionary Trust (Doc. 506) (the “Motion”) which requested authority from this Court for the Debtor to reimburse itself for certain expenses paid by the Debtor for the benefit of a beneficiary.

2. The Court scheduled a preliminary hearing on the Motion for May 1, 2025 at 11:00 a.m. (Doc. 511).

3. On April 23, 2025, Sharon James, the co-trustee of the trust at issue, filed her Opposition to the Motion (Doc. 520).

4. The Chapter 11 Trustee’s attorneys have been working with the attorney for Sharon James to resolve the issues in the Motion and to provide substantiation for the expenses paid by the

Debtor. The parties believe that the Motion can be resolved without a hearing but need additional time for the Debtor to provide certain documents and information to Ms. James.

5. Accordingly, the Chapter 11 Trustee respectfully requests that the Court continue the May 1 hearing on the Motion for a period of 30 days.

6. Undersigned counsel has consulted with counsel for Ms. James who agrees to the requested continuance of the hearing.

WHEREFORE, the Chapter 11 Trustee requests this Court enter an order substantially in the form attached hereto as **Exhibit A** granting the Motion, continuing the May 1 hearing for a period of 30 days, and granting such other and further relief as the Court deems just and proper.

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By: /s/ Raye C. Elliott

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Counsel for Chapter 11 Trustee, Michael Goldberg

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 30, 2025, 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.

/s/ Raye C. Elliott

Attorney

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 CONTINUE
PRELIMINARY HEARING ON CHAPTER 11 TRUSTEE'S
MOTION FOR AUTHORITY TO REIMBURSE EXPENSES FOR
SHYLAH JAMES FRAZIER DISCRETIONARY TRUST**

This case is before the Court on the Agreed Motion to Continue Preliminary Hearing on Chapter 11 Trustee's Motion for Authority to Reimburse Expenses for Shylah James Frazier Discretionary Trust ("the Motion") and the Court, having considered the Motion, and the agreement of Sharon James to the Motion, finds good cause exists to grant the Motion, and it is:

ORDERED:

1. The Motion is **GRANTED**.
2. The preliminary hearing on the Motion scheduled for May 1, 2025 at 11:00 a.m.

is continued to _____, 2025 at _____.

3. Although the Court will conduct the hearing in person, any interested party may choose to attend the hearing remotely using the services of Zoom Video Communications, Inc. ("Zoom"), which permits remote participation by video or by telephone. To participate in the hearing remotely via Zoom (whether by video or by telephone), you must register in advance, no later than 3:00 p.m. one business day before the date of the hearing. To register click the link below or manually enter the following web address into a browser:

<https://www.zoomgov.com/meeting/register/vJItcOGopjMpG2gRKyn-ipk6SXFbNivGTDA#/registration>

4. All participants, whether attending in person or remotely, must observe the formalities of the courtroom, exercise civility, and otherwise conduct themselves in a manner consistent with the dignity of the Court. This includes appropriate courtroom attire for those participants appearing in person or by video.

Raye C. Elliott, 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.