

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF FLORIDA  
West Palm Beach Division  
[www.flsb.uscourts.gov](http://www.flsb.uscourts.gov)

In re: Case No. 21-15555-BKC-EPK

PALM BEACH RESORT AND BEACH CLUB Chapter 11  
CONDOMINIUM ASSOCIATION, INC.,

Debtor-in-Possession.

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**DEBTOR'S AGREED EX-PARTE MOTION FOR  
CONTINUANCE OF CONFIRMATION HEARING**

Debtor, Palm Beach Resort and Beach Club Condominium Association, Inc. (the "Debtor"), by undersigned counsel, moves on an agreed ex-parte basis, for entry of an order continuing the confirmation hearing in this matter presently scheduled for October 20, 2021 at 2:00 p.m. (the "Hearing") pursuant to the *Order Setting Hearing on Confirmation of Subchapter V Plan* (the "Order Setting Confirmation") [ECF #54] for a period of twenty one days. In support of the Motion, the Debtor states as follows:

1. On June 4, 2021, the Debtor filed a Voluntary Petition for Relief under Chapter 11 subchapter V [ECF # 1].
2. On June 9, 2021, Maria Yip was appointed as the Subchapter V Trustee [ECF #19].
3. On July 12, 2021, the Meeting of Creditors was held and concluded [ECF #41].
4. On September 2, 2021, the Debtor timely filed its Chapter 11 Small Business Subchapter V Plan (the "Plan") [ECF #53].
5. On September 7, 2021, the Court entered the Order Setting Confirmation [ECF #54], which set the Plan confirmation hearing for October 20, 2021 at 2:00 p.m.

6. Given the nature of the Debtor's business, there are various individuals and entities who hold ownership interests who need to be accounted for in this case. Indeed, there are over 1,000 holders of ownership interest.

7. Since the filing of the case, the Debtor has become aware of additional information relating to the ownership interests that requires amendment of the initial list published on the website for this case: <https://www.eisingerlaw.com/palmbeachresort-bankruptcy/>.

8. Accordingly, in order to ensure that the Hearing is based on the most accurate information, the Debtor requests continuance of the Hearing to allow the Debtor to prepare and finalize an amended list.

9. Further, due to a prior commitment, the Debtor's primary counsel, the undersigned, has a prior commitment on the morning of the Hearing, which is expected to extend into the late afternoon and will likely conflict with the Hearing as presently scheduled.

10. The Debtor has conferred with the Subchapter V Trustee, and she has no objection to the relief requested herein.

WHEREFORE, the Debtor respectfully requests entry of an order on an agreed, *ex parte* basis (a) continuing the Hearing by twenty-one (21) days; and (b) granting such other relief as this Court deems appropriate under the circumstances.

Dated: September 30, 2021

**LEIDERMAN SHELOMITH ALEXANDER +  
SOMODEVILLA, PLLC**

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By: \_\_\_\_\_/s/ \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on September 30, 2021 to all parties on the list to receive e-mail notice/service for this case, via the Notice of Electronic Filing (which is incorporated herein by reference).

By: \_\_\_\_\_/s/\_\_\_\_\_  
Ido J. Alexander