### UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

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NEIGHBORS LEGACY HOLDINGS, INC.,

Debtors.

Chapter 11 Case No. 18-33836-H1-11 (MI)

# CERTIFICATE OF NO OBJECTION TO UNSECURED CREDITOR TRUSTEE'S MOTION FOR ENTRY OF AN ORDER EXTENDING <u>DURATION OF UNSECURED CREDITOR TRUST</u>

(Related Docket No. 1266)

The undersigned hereby certifies as follows:

1. On January 31, 2024, the Unsecured Creditor Trustee's Motion For Entry Of An Order Extending Duration Of Unsecured Creditor Trust [Docket No. 1266] (the "Motion") was filed with the Court.

2. Responses, if any, to the Motion were required to have been filed with the Court on

or before February 21, 2024 (the "Response Deadline").

3. The Response Deadline has passed and no responsive pleading to the Motion has appeared on the Court's docket in the above-captioned chapter 11 cases or was served upon the undersigned counsel. Accordingly, the undersigned respectfully requests that the form of Order granting the Motion attached hereto be entered at the earliest convenience of the Court.



Dated: February 22, 2024

By: /s/ Michael D. Warner.

Michael D. Warner (TX Bar No. 00792304) **PACHULSKI STANG ZIEHL & JONES LLP** 700 Louisiana Street, Suite 4500 Houston, TX 77002 Telephone: (713) 691-9385 Facsimile: (713) 691-9407 Email: mwarner@pszjlaw.com

Counsel for Mark Shapiro, Unsecured Creditor Trustee

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 22<sup>nd</sup> day of February, 2024, a true and correct copy of the above and foregoing was caused to be served through this Court's CM/ECF noticing system to all parties registered to receive notices in these cases.

/s/ Michael D. Warner Michael D. Warner, Esq.

### UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

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IN RE:

NEIGHBORS LEGACY HOLDINGS, INC.,

Debtors.

Chapter 11 Case No. 18-33836-H1-11 (MI)

#### ORDER (I) APPROVING UNSECURED CREDITOR TRUSTEE'S MOTION FOR ENTRY OF AN ORDER EXTENDING DURATION OF UNSECURED CREDITOR TRUST

(Related Docket No. 1266)

Upon the Unsecured Creditor Trustee's Motion for Entry of an Order Extending Duration of Unsecured Creditor Trust (the "Motion");<sup>1</sup> and this Court having found that (i) it has jurisdiction over the matters raised in the Motion pursuant to 28 U.S.C. § 1334; (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and the Court may enter a final order consistent with Article III of the United States Constitution; (iii) venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; (iv) notice of the Motion was sufficient; and (v) good and sufficient cause exists for the granting of the relief requested in the Motion and necessary to accomplish the purpose of the Unsecured Creditor Trust after having given due deliberation upon the Motion and all of the proceedings had before the Court in connection with the Motion,

#### **IT IS HEREBY ORDERED THAT:**

 The term of the Unsecured Creditor Trust is extended through and including April 8, 2025.

<sup>&</sup>lt;sup>1</sup> Unless otherwise noted, the capitalized terms herein shall have the definitions ascribed to them in the Motion or the Plan Documents.

### Case 18-33836 Document 1268-1 Filed in TXSB on 02/22/24 Page 2 of 2

- 2. The Unsecured Creditor Trustee's right to request further extensions for cause upon notice and hearing is hereby preserved.
  - 3. This Court retains exclusive jurisdiction and authority to interpret and enforce this

Order, and to resolve any dispute arising from or related to this Order.

## Signed:

MARVIN ISGUR UNITED STATES BANKRUPTCY JUDGE