

1 SCOTT B. COHEN, SBA #014377
2 PATRICK A. CLISHAM, SBA #023154
3 **ENGELMAN BERGER, P.C.**
2800 NORTH CENTRAL AVENUE, SUITE 1200
PHOENIX, ARIZONA 85004

4 Ph: (602) 271-9090
5 Fax: (602) 222-4999
Email: sbc@eblawyers.com
Email: pac@eblawyers.com

6 Counsel for Debtor and Debtor in Possession

7 **IN THE UNITED STATES BANKRUPTCY COURT**
8 **FOR THE DISTRICT OF ARIZONA**

9 In re:

10 CONTINENTAL COUNTRY CLUB,
11 INC., an Arizona Non-profit corporation,
12 EIN 86-0414438

13 Debtor.

Chapter 11 Proceeding

Case No. 3:21-bk-00956-EPB

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16 **CERTIFICATE OF SERVICE AND OF NO OBJECTION**
17 **AND REQUEST FOR ENTRY OF ORDER**

18 PATRICK A. CLISHAM, a shareholder with the law firm of Engelman Berger, P.C.
19 (“EB”), attorneys for Continental Country Club, Inc., the debtor and debtor-in-possession in
20 the above-captioned bankruptcy case (“Debtor”), hereby certifies, under oath and penalty of
21 perjury, as follows:

22 1. On June 23, 2021, EB filed *“Engelman Berger, P.C.’s Second Interim*
23 *Application for Allowance and Payment of Fees and Reimbursement of Expenses for*
24 *Services Rendered as Bankruptcy Counsel for the Debtor”* (“EB Fee Request”).

25 2. On that same date, EB filed the *“Notice of Filing Engelman Berger, P.C.’s*
26 *First Interim Application for Allowance and Payment of Fees and Reimbursement of*
27 *Expenses for Services Rendered as Bankruptcy Counsel for the Debtor”* (“Notice”), and

1 served the Notice upon all interested parties, which included posting the Notice on the
2 Debtor's online portal.

3 3. The Notice gave parties twenty-one (21) days, plus three (3) mailing days, to
4 file opposition to the EB Fee Request. That deadline has expired.

5 4. As of the date of this certification, EB has received no objection to the EB Fee
6 Request, and the Court docket reflects that no opposition has been filed by any party.

7 In light of the foregoing, the Debtor requests that the Court enter an order approving
8 the EB Fee Request on an interim basis without further notice or hearing.

9 RESPECTFULLY SUBMITTED this 19th day of July, 2021.

10
11 **ENGELMAN BERGER, P.C.**

12 By: /s/ Patrick A. Clisham, #023154
13 Scott B. Cohen
14 Patrick A. Clisham
15 Bradley D. Pack
16 *Attorneys for Debtor and Debtor in*
17 *Possession*

18 **COPY** of the foregoing transmitted
19 via the Court's ECF system, and
20 as indicated this 19th day of July,
21 2021, to the following parties:

22 Larry L. Watson
23 **OFFICE OF THE U.S. TRUSTEE**
24 Email: Larry.Watson@usdoj.gov
25 Email: Christopher.Stewart2@ust.doj.gov

26 Alissa Brice Castaneda
27 **QUARLES & BRADY**
Email: Alissa.Castaneda@quarles.com
Attorneys for Sunwest Bank

SYNCHRONY BANK
c/o PRA Receivables Management, LLC
Email: Claims_RMSC@PRAGroup.com

Warren J. Stapleton
OSBORN MALEDON, P.A.
Email: wstapleton@omlaw.com
Attorneys for Lakeside Legionnaires

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Kristin McDonald
OFFICE OF THE ATTORNEY GENERAL
Email: Kristin.McDonald@azag.gov
Attorneys for the State of Arizona ex rel.
Arizona Department of Revenue

Robert J. Berens
SMTD LAW LLP
Email: rberens@smtdlaw.com
Pro Per

Jon S. Musial
LAW OFFICE OF JON S. MUSIAL
Email: Jon.Musial@MusialLawOffice.com
Attorneys for Amy Jo Marshall

Randy Nussbaum
Sierra M. Minder
SACKS TIERNEY P.A.
Email: Randy.Nussbaum@SacksTierney.com
Email: Sierra.Minder@SacksTierney.com
Attorneys for Flagstaff Golf Association
dba Aspen Valley Golf Club

On July 19, 2021, a copy of the foregoing document was also posted on Debtor's court-approved web portal for the benefit of all property owners who have not otherwise opted out of this form of service

/s/ Cecily N. Benson