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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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15  
16 **CERTIFICATE OF SERVICE AND OF NO OBJECTION**  
17 **AND REQUEST FOR ENTRY OF ORDER**

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

22 1. On December 17, 2021, EB filed *“Warner Angle Hallam Jackson &*  
23 *Formanek PLC’s Fourth Interim Application for Allowance and Payment of Fees as*  
24 *Special Litigation Counsel for the Debtor”* (“Warner Angle Fee Request”).

25 2. On that same date, EB filed the *“Notice of Filing Warner Angle Hallam*  
26 *Jackson & Formanek PLC’s Fourth Interim Application for Allowance and Payment of*

1 ***Fees as Special Litigation Counsel for the Debtor*** (“Notice”), and served the Notice upon  
2 all interested parties, which included posting the Notice on the 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 Warner Angle Fee Request. That deadline has expired.

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

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

10 RESPECTFULLY SUBMITTED this 12<sup>th</sup> day of January, 2021.

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

12 By: /s/ Scott B. Cohen  
13 Scott B. Cohen  
14 Patrick A. Clisham  
15 *Attorneys for Debtor and Debtor in Possession*

16 **COPY** of the foregoing transmitted  
17 via the Court’s ECF system, and  
18 as indicated this 12<sup>th</sup> day of January,  
19 2022, to the following parties:

20 Larry L. Watson  
21 OFFICE OF THE U.S. TRUSTEE  
22 Email: [Larry.Watson@usdoj.gov](mailto:Larry.Watson@usdoj.gov)

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*Attorneys for Brickhouse Trust*

On January 12, 2022, 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  
Cecily N. Benson