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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
14 Debtor.

Chapter 11 Proceeding

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

**NOTICE OF FILING KRUPNIK &
SPEAS, PLLC'S SIXTH INTERIM
APPLICATION FOR APPROVAL
AND ALLOWANCE OF FEES
AND REIMBURSEMENT OF
EXPENSES AS SPECIAL HOA
COUNSEL FOR THE DEBTOR**

16 **NOTICE IS HEREBY GIVEN** that Krupnik & Speas, PLLC ("Krupnik Firm") as
17 duly-appointed special counsel to Continental Country Club, Inc., the above-captioned Debtor
18 and debtor in possession ("Debtor") has filed its *Sixth Interim Application for Allowance and*
19 *Payment of Fees and Reimbursement of Expenses for Services Rendered as Special HOA*
20 *Counsel for the Debtor* (the "Sixth Interim Fee Application") with the Court on February 14,
21 2022.

22 The Sixth Interim Fee Application seeks: (1) approval and allowance of \$9,074 in fees
23 and \$55.33 in costs, for a total of \$9,129.33, incurred from December 1, 2021 through
24 January 31, 2022 (the "Sixth Application Period"); and (2) an order directing Debtor to pay
25 all fees and costs allowed by the Court for the Sixth Application Period following the entry of
26 an Order approving such fees, provided funds are available and such payment does not
27 prejudice other administrative claims of the estate. Any Order approving fees and costs

1 awarded by the Court pursuant to the Sixth Interim Fee Application shall be interlocutory and
2 subject to re-examination and adjustment by the Court during the course of the bankruptcy
3 case, and the Court may order disgorgement of any interim fees or costs paid by the Debtor.
4 The failure of a creditor or party in interest, including Debtor, to object to the Sixth Interim
5 Fee Application shall not preclude them from asserting such objections upon the Krupnik
6 Firm's filing of a final fee application.

7 **NOTICE IS FURTHER GIVEN** that you may obtain a copy of the Sixth Interim Fee
8 Application by accessing the Court's ECF system, or by contacting counsel for the Debtor,
9 Attn: Cindy K. Solomon, Engelman Berger, P.C. ("EB"), at 602.222.4978, or email
10 cks@eblawyers.com.

11 **NOTICE IS FURTHER GIVEN** that any objection to the Sixth Interim Fee
12 Application must be in writing and the original filed with the Clerk of the United States
13 Bankruptcy Court, 230 North 1st Avenue, Suite 101, Phoenix, Arizona 85003, with a copy
14 served upon EB at the address listed below.

15 Patrick A. Clisham
16 Engelman Berger, P.C.
2800 North Central Avenue, Suite 1200
17 Phoenix, Arizona 85004
pac@eblawyers.com

18 **FURTHER NOTICE IS GIVEN** that, pursuant to Local Bankruptcy Rule 2002-2 and
19 9014-1(k), if no written objection is filed with the Court and a copy served upon EB
20 **WITHIN 21 DAYS** of service of this notice (plus an additional 3 days if this notice was
21 served by mail), an Order granting the Sixth Interim Fee Application may be entered without
22 further hearing or notice.

23 **DATED** this 14th day of February, 2022.

24 **ENGELMAN BERGER, P.C.**

25
26 By: /s/ Patrick A. Clisham, SBA # 023154

27 Scott B. Cohen
Patrick A. Clisham

Attorneys for Debtor and Debtor in Possession

1 **COPY** of the foregoing transmitted
2 via the Court's ECF system, and
3 as indicated this 14th day of February,
4 2022, to the following parties, **and posted**
5 **to Debtor's web portal for homeowners.**

6 Larry L. Watson
7 OFFICE OF THE U.S. TRUSTEE
8 Email: Larry.Watson@usdoj.gov

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17 *Party*

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Case No. CV 87-042997

By: /s/ Cindy K. Solomon, CP
Cindy K. Solomon, CP