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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

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 November 21, 2022 at DE 389, EB filed ***“Krupnik & Speas, PLLC’s Ninth***
23 ***Interim Application for Allowance and Payment of Fees and Reimbursement of Expenses***
24 ***for Services Rendered as Special HOA Counsel for the Debtor*”** (“Krupnik Fee Request”).

25 2. On that same date at DE 390, EB filed the ***“Notice of Filing Krupnik & Speas,***
26 ***PLLC’s Ninth Interim Application for Allowance and Payment of Fees and***
27 ***Reimbursement of Expenses for Services Rendered as Special HOA Counsel for the***

1 **Debtor**” (“Notice”), and served the Notice upon all interested parties, which included posting
2 the Notice on the Debtor’s online portal.

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

5 4. As of the date of this certification, EB has received no objection to the Krupnik
6 Fee 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 Krupnik Fee Request on an interim basis without further notice or hearing.

9 RESPECTFULLY SUBMITTED this 12th day of December, 2022.

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

11 By: /s/ Patrick A. Clisham

12 Scott B. Cohen
13 Patrick A. Clisham
14 *Attorneys for Debtor and Debtor in Possession*

15 **COPY** of the foregoing transmitted
16 via the Court’s ECF system, and
17 as indicated this 12th day of Dec.,
18 2022, to the following parties:

19 Larry L. Watson
20 OFFICE OF THE U.S. TRUSTEE
21 Email: Larry.Watson@usdoj.gov

22 Alissa Brice Castaneda
23 DORSEY & WHITNEY LLP
24 Email: Castaneda.alissa@dorsey.com
25 *Attorneys for Sunwest Bank*

26 Robert J. Berens
27 SMTD LAW LLP
28 Email: rberens@smtdlaw.com
29 *Interested Party*

30 Matthew Silverman
31 ARIZONA ATTORNEY GENERAL
32 Email: Matthew.silverman@azag.gov
33 *Attorneys for Arizona Dept. of Revenue*

34 Jon S. Musial
35 LAW OFFICE OF JON S. MUSIAL
36 Email: jon.musial@musiallawoffice.com
37 *Attorneys for Amy Jo Marshall, Interested Party*

38 Randy Nussbaum
39 SACKS TIERNEY P.A.
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41 *Attorneys for Flagstaff Golf Association dba Aspen Valley Golf*

42 Warren J. Stapleton
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45 *Attorneys for Lakeside Legionnaires*

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4 Jason J. Bliss
5 ASPEY, WATKINS, & DIESEL PLLC
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7 *Co-Counsel for Lakeside Legionnaires in*
8 *Case No. CV 87-042997*

9 On December 12, 2022, a copy of the foregoing document was also posted on Debtor's court-
10 approved web portal for the benefit of all property owners who have not otherwise opted out
11 of this form of service.

12 /s/ Lydia K. Miller
13 Lydia K. Miller
14 Legal Assistant
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