

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

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 January 25, 2023, at DE 411, EB filed ***“Krupnik & Speas, PLLC’s Tenth***
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 412, EB filed the ***“Notice of Filing Krupnik & Speas,***
26 ***PLLC’s Tenth 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 16th day of February, 2023.

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
15 Possession*

16 **COPY** of the foregoing transmitted
17 via the Court’s ECF system, and
18 as indicated this 16th day of Feb.,
19 2023, to the following parties:

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

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

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

Matthew Silverman
ARIZONA ATTORNEY GENERAL
Email: Matthew.silverman@azag.gov
Attorneys for Arizona Dept. of Revenue

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

Randy Nussbaum
SACKS TIERNEY P.A.
Email: randy.nussbaum@sackstierney.com
*Attorneys for Flagstaff Golf Association dba
Aspen Valley Golf*

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

Beth Mulcahy
MULCAHY LAW FIRM, P.C.
Email: bmulcahy@mulcahylawfirm.com
Attorneys for Creditor

1 Valerie Smith
2 SYNCHRONY BANK
3 Email: Claims_RMSC@PRAGroup.com

Joel F. Newell
JENNINGS, STROUSS & SALMON,
P.L.C.
Email: jnewell@jsslaw.com
Attorneys for Brickhouse Trust

4 Jason J. Bliss
5 ASPEY, WATKINS, & DIESEL PLLC
6 Email: JBliss@awdlaw.com
7 *Co-Counsel for Lakeside Legionnaires in*
8 *Case No. CV 87-042997*

9 On February 16, 2023, 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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