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8 Attorneys for Reorganized Debtor

9 **IN THE UNITED STATES BANKRUPTCY COURT**
10 **FOR THE DISTRICT OF ARIZONA**

11 In re:
12 CONTINENTAL COUNTRY CLUB,
13 INC., an Arizona Nonprofit corporation,
14 EIN 86-0414438
15 Reorganized Debtor.

Chapter 11 Proceeding

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

**NOTICE OF FILING KRUPNIK &
SPEAS, PLLC'S ELEVENTH
INTERIM AND FINAL
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., an Arizona non-profit
18 corporation, the above-captioned reorganized debtor (“Reorganized Debtor”), has filed its
19 *Eleventh Interim and Final Application for Allowance and Payment of Fees and*
20 *Reimbursement of Expenses for Services Rendered as Special HOA Counsel for the Debtor*
21 (the “Application”) with the Court on March 17, 2023.

22 The Application seeks: (1) interim and final approval and allowance of \$5,347.00 in
23 fees, incurred from January 1, 2023 through March 16, 2023 (the “Eleventh Application
24 Period”); (2) final approval of the fees approved and allowed on an interim basis under prior
25 Court Orders, totaling \$123,779.60; (3) an order directing the Reorganized Debtor to
26 immediately pay all approved and allowed fees incurred during the Eleventh Application
27

1 Period; and (4) an order declaring that any unpaid approved fees and costs are deemed an
2 administrative expense claim as defined in the Debtor's Second Amended Plan of
3 Reorganization, which was confirmed on March 2, 2023 (the "Confirmed Plan").

4 **NOTICE IS FURTHER GIVEN** that you may obtain a copy of the Application by
5 accessing the Court's ECF system, or by contacting counsel for the Reorganized Debtor, Attn:
6 Alyssa C. Moomaw, Engelman Berger, P.C. ("EB"), at 602.222.4962, or email
7 acm@eblawyers.com.

8 **NOTICE IS FURTHER GIVEN** that any objection to the Application must be in
9 writing and the original filed with the Clerk of the United States Bankruptcy Court, 230 North
10 1st Avenue, Suite 101, Phoenix, Arizona 85003, with a copy served upon EB at the address
11 listed below.

12 Scott B. Cohen
13 Engelman Berger, P.C.
14 2800 North Central Avenue, Suite 1200
15 Phoenix, Arizona 85004
16 sbc@eblawyers.com

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

22 **SUBMITTED AND NOTICE GIVEN** this 17th day of March, 2023.

23 **ENGELMAN BERGER, P.C.**

24 By: /s/Scott B. Cohen
25 Scott B. Cohen
26 Patrick A. Clisham
27 *Attorneys for Reorganized Debtor*

28 **COPY** of the foregoing transmitted via
29 the Court's ECF system, and as indicated
30 this 17th day of March, 2023, to the
31 following parties, **and posted to Reorganized
32 Debtor's web portal for homeowners**

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2 OFFICE OF THE U.S. TRUSTEE
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22 By: /s/ Alyssa C. Moomaw
23 Alyssa C. Moomaw