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6 Counsel for Reorganized Debtor

7 **IN THE UNITED STATES BANKRUPTCY COURT**
8 **FOR THE DISTRICT OF ARIZONA**

9 In re:

10 CONTINENTAL COUNTRY CLUB,
11 INC., an Arizona Nonprofit corporation,
12 EIN 86-0414438

13
14 Reorganized 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 SCOTT B. COHEN, a shareholder with the law firm of Engelman Berger, P.C. (“EB”),
19 attorneys for Continental Country Club, Inc., an Arizona non-profit corporation, the above-
20 captioned reorganized debtor (“Reorganized Debtor”), hereby certifies, under oath and
21 penalty of perjury, as follows:

- 22 1. On March 17, 2023, at DE 447, EB filed ***“Krupnik & Speas, PLLC’s Eleventh***
23 ***Interim and Final Application for Allowance and Payment of Fees and Reimbursement of***
24 ***Expenses for Services Rendered as Special HOA Counsel for the Debtor*”** (“Application”).
25 2. On that same date, at DE 448, EB filed the ***“Notice of Filing Krupnik & Speas,***
26 ***PLLC’s Eleventh Interim and Final 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 Reorganized 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 Application. That deadline has expired.

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

7 In light of the foregoing, the Reorganized Debtor requests that the Court enter an order
8 approving the Application on a final basis without further notice or hearing.

9 RESPECTFULLY SUBMITTED this 10th day of April, 2023.

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

12 By: /s/ Scott B. Cohen

13 Scott B. Cohen

Patrick A. Clisham

Attorneys for Reorganized Debtor

14 **COPY** of the foregoing transmitted
15 via the Court’s ECF system, and
16 as indicated this 10th day of April,
2023, to the following parties:

17 Larry L. Watson
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*Co-Counsel for Lakeside Legionnaires in
Case No. CV 87-042997*

14 On April 10, 2023, a copy of the foregoing document was also posted on Reorganized
15 Debtor's court-approved web portal for the benefit of all property owners who have not
16 otherwise opted out of this form of service.

16 /s/ Alyssa C. Moomaw
17 Alyssa C. Moomaw
18 Paralegal
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