## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF MARYLAND (Baltimore Division)

In re:

The Law Offices of Jonathan S. Resnick, LLC

The Law Offices of Perry A. Resnick, LLC

The Law Offices of Jonathan S. Resnick, PLLC

Debtors \* \* \* \* \* \* \*

Zvi Guttman, Trustee

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The Law Offices of Jonathan S. Resnick, LLC

The Law Offices of Perry A. Resnick, LLC

The Law Offices of Jonathan S. Resnick, PLLC

Jonathan S. Resnick

Perry A. Resnick

David B. Cohen

Joy Wise

Cindy Tokarski

Respondents

 Case No: 20-12822-NVA Chapter 11

Case No: 20-14188-NVA

\* Chapter 11

\* Case No: 20-14188-NVA Chapter 11

(Jointly Administered under Case No.: 20-12822-NVA)

CONTESTED MATTER

\* \* \* \* \* \* \* \* \* \* \*

MOTION TO SHORTEN TIME AND/OR REQUEST FOR EXPEDITED HEARING RE: EMERGENCY MOTION FOR ORDER

(A) DESIGNATING RESPONDENTS PURSUANT TO RULE 9001(5), (B) COMPELLING DEBTORS AND THOSE ACTING FOR OR IN CONCERT WITH THEM TO TURN OVER RECORDED INFORMATION TO TRUSTEE, (C) DIRECTING AN ACCOUNTING, AND (D) ENJOINING DEBTORS AND THOSE ACTING FOR OR IN CONCERT WITH THEM FROM FURTHER VIOLATING THE AUTOMATIC STAY

Zvi Guttman, Esq. (the "Trustee"), chapter 11 trustee of The Law Offices of Jonathan S. Resnick, LLC (the "JSR LLC Debtor") The Law Offices of Jonathan S. Resnick, PLLC (the "JSR PLLC Debtor") and The Law Offices of Perry A. Resnick, LLC (the "PAR Debtor," and together with the JSR LLC Debtor and the JSR PLLC Debtor, the "Debtors"), pursuant to Local Bankruptcy Rule 9013-7, files this Motion to Shorten Time and/or Request For Expedited Hearing, and states:

**Request**: The Movant requests that the Court shorten the time to object to the motion or other paper identified herein in accordance with and for the reasons explained below. If a timely objection is filed or the Court otherwise finds a hearing necessary, the Movant requests that the Court set a hearing on the motion or other paper on the date requested below or as soon as reasonably practicable.

**Title of Motion**: Emergency Motion for Order (A) Designating Respondents Pursuant to Rule 9001(5), (B) Compelling Debtors and Those Acting for or in Concert with Them to Turn over Recorded Information to Trustee, (C) Directing an Accounting, and (D) Enjoining Debtors and Those Acting for or in Concert with Them from Further Violating the Automatic Stay.

Requested Objection Deadline: May 20, 2020 Requested Hearing Date: May 22 or 27, 2020

**Reasons for Request**: In order to operate the Debtors' businesses and to generally fulfil his statutory duties as a chapter 11 trustee, the Trustee requires the books and records characteristic of any operating business. The Respondents appear to have possession, custody and/or control of these books and records and other information needed by the Trustee to operate the Debtors' business but refuse to provide same to him.

### Parties affected by the relief requested in the Motion or Other Paper:

Jonathan S. Resnick
Perry A. Resnick
David B. Cohen
Joy Wise
Cindy Tokarski

I hereby certify that the reduction of the time period is not prohibited under Fed. R. Bankr. P 9006(c)(1).

/s/ Zvi Guttman
Zvi Guttman (06902)
The Law Offices of Zvi Guttman, P.A.
Post Office Box 32308
Baltimore, Maryland 21282
(410) 580-0500
zvi@zviguttman.com

Counsel to the Trustee

### **CERTIFICATE OF SERVICE**

I hereby certify that on 14<sup>th</sup> day of May, 2020, copies of the foregoing Motion to Shorten were served by first class mail, postage prepaid, on:

Joy Wise 39 Cougar Drive Hanover, PA 17331

Cindy Tokarski 6630 Washington Blvd., Apt 1 Elkridge, MD 21075

Jonathan Resnick, Esq. (Individually and as principal of JSR PLLC and JSR LLC) 7483 Valencia Drive Boca Raton, FL 33433

Perry Resnick, Esq. (Individually and as principal of PAR LLC) 7483 Valencia Drive Boca Raton, FL 33433

David Cohen ECP Capital 8177 Glades Road Boca Raton, FL 33434

### Via CM/ECF on:

Alan M. Grochal <u>agrochal@tydingslaw.com</u>, <u>mfink@tydingslaw.com</u>, <u>imurphy@tydingslaw.com</u>

Catherine Keller Hopkin <u>chopkin@yvslaw.com</u>, <u>pgomez@yvslaw.com</u>, <u>yvslawcmecf@gmail.com</u>, <u>stevenslr39990@notify.bestcase.com</u>, hopkincr39990@notify.bestcase.com, schroppjr39990@notify.bestcase.com

Katherine A. (UST) Levin Katherine.A.Levin@usdoj.gov, brenda.b.wilmore@usdoj.gov

Craig Palik <u>cpalik@mhlawyers.com</u>, <u>dmoorehead@mhlawyers.com</u>, <u>cpalik@ecf.inforuptcy.com</u>, <u>kolivercross@mhlawyers.com</u>

US Trustee - Baltimore <u>USTPRegion04.BA.ECF@USDOJ.GOV</u>

Maurice Belmont VerStandig mac@mbvesq.com, lisa@mbvesq.com

Richard G. Hackerman richard@richardhackerman.com

Patricia B. Jefferson pjefferson@milesstockbridge.com

Via email on:

Dcohen101@mac.com

joy.wise97@gmail.com

Via text message on:

Cindy Tokarski (443) xxx-5186)

/s/ Zvi Guttman

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Debtors \* \* \* \* \* \*

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\* Case No: 20-12822-NVA Chapter 11

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Chapter 11

Chapter 11

(Jointly Administered under Case No.: 20-12822-NVA)

**CONTESTED MATTER** 

Joy Wise

Cindy Tokarski

Respondents

\* \* \* \* \* \* \* \* \* \* \* \*

### ORDER GRANTING MOTION TO SHORTEN TIME AND REQUEST FOR EXPEDITED HEARING

Having considered the Motion to Shorten Time and/or Request for Expedited Hearing filed by Zvi Guttman, Chapter 11 Trustee, it appearing that cause exists to grant the relief requested, and pursuant to Local Bankruptcy Rule 9013-7, it is, by the United States Bankruptcy Court for the District of Maryland,

ORDERED, that the time to object to the *Emergency Motion for Order (A)*Designating Respondents Pursuant to Rule 9001(5), (B) Compelling Debtors and Those Acting for or in Concert with Them to Turn over Recorded Information to Trustee, (C)

Directing an Accounting, and (D) Enjoining Debtors and Those Acting for or in Concert with Them from Further Violating the Automatic Stay (the Emergency Motion") is shortened to the date and time set forth above; and it is further

ORDERED, that a hearing upon the Emergency Motion will be held on the date and time set forth via remote electronic means to be provide by the Court in a separate Notice or Order of this Court; and it is further

ORDERED, that the Movant shall serve by overnight delivery, electronic mail, or facsimile a copy of the Emergency Motion and this Order on the affected parties identified in the Motion to Shorten Time and/or Request for Expedited Hearing or their counsel and file the applicable Certificate of Service within one day of entry of this Order; and it is further

ORDERED, that if no objection is filed by any party in interest to the Emergency Motion, the Emergency may be granted without further notice or hearing.

### **Suggested Distribution List:**

Joy Wise 39 Cougar Drive Hanover, PA 17331

Cindy Tokarski 6630 Washington Blvd., Apt 1 Elkridge, MD 21075

Jonathan Resnick, Esq. (Individually and as principal of JSR PLLC and JSR LLC) 7483 Valencia Drive Boca Raton, FL 33433

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David Cohen ECP Capital 8177 Glades Road Boca Raton, FL 33434

Zvi Guttman, Esq. The Law Offices of Zvi Guttman, P.A. Post Office Box 32308 Baltimore, Maryland 21282

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Craig Palik <u>cpalik@mhlawyers.com</u>, <u>dmoorehead@mhlawyers.com</u>, <u>cpalik@ecf.inforuptcy.com</u>, <u>kolivercross@mhlawyers.com</u>

US Trustee - Baltimore <u>USTPRegion04.BA.ECF@USDOJ.GOV</u>

Maurice Belmont VerStandig mac@mbvesq.com, lisa@mbvesq.com

Richard G. Hackerman <u>richard@richardhackerman.com</u>

Patricia B. Jefferson <u>pjefferson@milesstockbridge.com</u>

**END OF ORDER**