

Background

6. Prepetition, the Debtor operated a scaffolding rental services company. The Debtor was headquartered in leased space at 1177 Patuxent Road, Odenton, MD 21113 ("Headquarters"). Historically, the Debtor's geographic footprint was Maryland, Virginia and Washington D.C. Recently, the Debtor also began providing services in the Southern Florida market from leased space at 20208 Northeast 15th Court, Miami, FL 33179 (the "Florida Office"). Both the Maryland and Florida locations have been surrendered to their respective landlords.

7. As of the filing of this case the Debtor was actively involved in approximately 24 projects. A majority of those projects have already concluded. However, the Trustee still has equipment on several active construction sites.

8. As a means of monetizing the Debtor's assets, the Trustee had hoped to sell its existing contracts to third parties. This has proven more difficult than anticipated and the Trustee requires additional time in which to wind down the remaining projects in an orderly and controlled fashion.

Cash Flow and Anticipated Costs

9. The Debtor has significant outstanding and ready to be billed receivables. The Trustee has collected some receivables as well as sold tangible assets. In addition there are postpetition receivables that have been accrued and must be collected.

10. During the Extended Wind Down Period the Trustee will continue to incur expenses similar to those incurred during the Initial Wind Down Period all as set forth in ¶ 13 of the *Motion of Chapter 7 Trustee for Authority to Wind Down Debtor's Business and for Rule 9001 Designation*. (e.g., insurance, clerical, record retention, contract preservation, taxes, etc.)

Period of Wind Down

11. The Trustee seeks to continue to wind down the Debtor's operations for an additional 45 days.

Miscellaneous

12. During the wind down, the Trustee will continue to maintain insurance, and banking relationships with Bank of America and First National Bank of Pennsylvania.

WHEREFORE, the Trustee moves for the entry of an Order substantially in the form attached hereto:

- a. Authorizing the Trustee to wind down the Debtor's business as proposed herein; and
- b. Granting such other and further relief as is just and proper.

/s/ Zvi Guttman

Zvi Guttman (06902)

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CERTIFICATE OF SERVICE

I certify that on this November 12, 2019, a copy of the foregoing *Motion of Chapter 7 Trustee for Further Authority to Wind Down Debtor's Business* were served as follows:

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/s/ Zvi Guttman

if, in his sole discretion he determines that the wind down is no longer in the best interest of the estate, or (ii) may seek an order authorizing him to continue the wind down for a longer period of time if he determines that such additional time is necessary and in the best interest of the estate;

- C. The Trustee may bill and collect all sums due the Debtor for any and all pre and post petition services and rentals. Any entity that owes a debt to the Debtor or the estate shall promptly pay such debt to, or on the order of, the Trustee;
- D. The Trustee may pay such expenses as are reasonable and necessary to carry out the wind down including those expenses enumerated in & 13 of the original Wind Down Motion;
- E. Creditors, customers, banks, governmental entities, insurance companies, and third parties shall recognize the Trustee's authority over the assets and records of the Debtor and as the authorized representative of the bankruptcy estate. A copy of this Order shall be sufficient evidence of said authority;
- F. Bank of America and First National Bank of Pennsylvania shall continue to accept deposits and maintain the freeze placed by the Trustee on debit transactions in the Debtor's bank accounts as and until otherwise directed by the Trustee. The Trustee shall be the sole signatory and authorized person relative to the accounts, the Banks shall treat the Trustee as the owner of the said accounts for all purposes, and shall provide, upon request by the Trustee, copies of past and present statements, check images, deposits and wires;
- G. The Trustee shall provide the Office of the U.S. Trustee with such reports regarding the wind down as the U.S. Trustee may from time to time request.

and it is

FURTHER ORDERED, that the Trustee is authorized to take any and all actions and to execute any and all documents necessary and appropriate to effectuate and consummate the terms of this Order; and it is

FURTHER ORDERED, that this Order shall be immediately effective upon its entry.

Suggested Distribution List

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End of Order