

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

In re:

Chapter 11

Hiawatha Manor Association, Inc.,

Case No. 25-01916

Debtor.

Judge Randal S. Mashburn

**LIMITED OBJECTION TO DEBTOR’S MOTION
TO CONTINUE AND CONSOLIDATE HEARINGS**

Linda (Lindstrom) Simmons (“undersigned”), a co-owner of interests in the property subject to this bankruptcy, respectfully submits this limited objection to the Debtor’s motion to continue and consolidate the hearing currently scheduled for June 24, 2025, with a proposed date of July 8, 2025.

1. Undersigned received an email from Debtor’s counsel on the morning of June 17, 2025, indicating an intent to seek continuance. Undersigned’s response, declining to consent to consolidation, was sent later that same day and is attached hereto as *Exhibit A*.

2. Undersigned respectfully objects to the consolidation of the hearing currently scheduled for June 24 with matters proposed for July 8. As of this filing, no hearing has been set or noticed for that date in connection with Debtor’s pending application to employ counsel. The motion scheduled for June 24 raises threshold procedural concerns that, in undersigned’s view, warrant timely and independent review by the Court. To undersigned’s knowledge, no documentation has been filed establishing compliance with the procedural requirements applicable to such a retention request.

3. In addition, undersigned has recently filed a Motion to Compel the Debtor to Amend Schedule G or file a verified statement, which implicates separate and serious issues concerning

the Debtor's disclosure obligations under 11 U.S.C. § 521(a)(1)(B)(iii) and Bankruptcy Rule 1007(b)(1)(C). Undersigned believes that matter should proceed under standard response deadlines unless otherwise ordered by the Court.

4. Should the Debtor wish to pursue a continuance of the June 24 hearing, undersigned respectfully requests that such relief be sought by formal motion. Undersigned reserves all rights.

5. This objection is not intended to delay proceedings, but to ensure proper process is observed in advance of any substantive relief. Undersigned respectfully submits that the Court's consideration of these matters in their proper procedural posture is in the best interest of the estate and all co-owners.

6. Undersigned respectfully notes that consolidating matters prematurely may preclude timely consideration of issues bearing directly on the integrity of the case administration.

WHEREFORE, undersigned respectfully requests that the Court decline to consolidate or continue the June 24 hearing, and grant such other and further relief as the Court deems just and proper.

Dated: June 17, 2025

Respectfully submitted,

/s/ Linda (Lindstrom) Simmons
Linda (Lindstrom) Simmons, Pro Se
9643 Chanteclair Circle
Highlands Ranch, CO 80126
Telephone: (615) 594-2866
Email: lindasimmons2866@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2025, a true and correct copy of the foregoing Limited Objection to Debtor's Motion to Continue and Consolidate Hearings, including *Exhibit A*, was filed and served via the Court's CM/ECF system on all parties entitled to electronic notice in this case, in accordance with Bankruptcy Rule 2002 and Local Rule 9013-1. In addition, notice was mailed by United States Mail, first-class postage paid, to:

Hiawatha Manor Association, Inc.

c/o Lemonjuice Solutions, Inc.
7380 W Sand Lake Rd, Suite 130
Orlando, FL 32819-5285

Hiawatha Manor Association, Inc.

8007 Cherokee Trail
Crossville, TN 38572

EXHIBIT A

Email Exchange Re: Proposed Hearing Continuance (June 17, 2025)

Re: In re Hiawatha Manor Association, Inc., No. 25-01916 (Bankr. M.D. Tenn.)

Linda Simmons <lindasimmons2866@gmail.com>

2:35 PM
(2 hours
ago)

to Blake.Roth@hklaw.com

Mr. Roth,

Thank you for your message.

At this time, I do not consent to continuing the June 24 hearing or to consolidating it with the July 8 hearing. My objection to the pending motion stands, and I believe it warrants timely and independent consideration by the Court. Similarly, my recently filed Motion to Compel addresses a distinct issue concerning the Debtor's disclosure obligations and should proceed according to the standard response deadlines, unless otherwise directed by the Court.

I remain committed to participating fully and professionally in these proceedings, but I believe further delay in addressing key issues -- particularly those involving transparency and oversight -- would not be in the estate's best interest.

Should the Debtor wish to seek a continuance, I would expect that to be done by formal motion. I reserve all rights.

Best regards,
Linda Simmons
Pro Se
9643 Chantecclair Circle
Highlands Ranch, CO 80126
(615) 594-2866
lindasimmons2866@gmail.com

On Tue, Jun 17, 2025 at 9:46 AM Blake.Roth@hklaw.com <Blake.Roth@hklaw.com> wrote:

Ms. Simmons,

Good morning. As a heads up, we are looking at continuing this hearing to the already scheduled July 8 hearing. We could also have your motion to compel presumably set for that date as well. Can you confirm whether that works for you? Many thanks in advance.

Blake Roth | Holland & Knight

Partner

Holland & Knight LLP

511 Union Street, Suite 2700 | Nashville, Tennessee 37219

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