

Helge Naber
Montana Bar Id. 7059
NABER PC
300 Central Avenue Suite 320
Great Falls Montana 59401
T (406) 452 3100
F (406) 452 6599
e naber@naberpc.com
ATTORNEY FOR CREDITOR

UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

In re CASE NO. 9:08-BK-04360-MGW

ULRICH F. ENGLER, CHAPTER 7
PRIVATE COMMERCIAL OFFICE INC. (substantively consolidated)
et. alt.
- Debtors -

_____ /

MOTION TO EXTEND TIME

Creditor Marianne STOCKINGER, by and through counsel, hereby respectfully moves the Court to extend the time set forth in Trustee’s Objection to Claim Nos. 568 and 594 by an additional 30 days in order to allow statement of a position:

1. Counsel for creditor had translated and forwarded the Trustee’s Objection and proposed treatment of claim to the creditor upon receipt.
2. Counsel has not heard back from the creditor whether creditor opposes the proposed treatment.
3. Due to the time spent to prepare the translation, and mailing times between counsel and creditor, an extension is sought to allow the Creditor to review the basis of the Trustee’s objection, confer with counsel about the possibility of opposing such objection, and transmit and translate documents in furtherance of an opposition, if one is meritorious to submit.
4. Counsel for the Trustee has been contacted concerning the extension of time sought, but no response was received by the time this motion is submitted for the Court’s consideration.

WHEREFORE, Creditor respectfully moves the Court to

- a. grant an extension of 30 days to oppose Trustee’s Objection to Claim; and
- b. grant Creditor any other relief the Court deems appropriate under the circumstances.

Respectfully submitted on 19 October 2015.

/s/ Helge Naber
ATTORNEY FOR CREDITOR
appearing pro hac vice

CERTIFICATE OF ELECTRONIC SERVICE

I hereby certify that a true and accurate copy of the foregoing MOTION TO EXTEND TIME has been distributed to all creditors and/or interested parties currently registered with the Court's CM/ECF electronic filing and notification system on **19 October 2015**.

/s/ Helge Naber
Montana Bar Id. 7059
ATTORNEY FOR CREDITOR
APPEARING PRO HAC VICE