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7 Attorneys for Michael G. Kasolas, Trustee

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10 UNITED STATES BANKRUPTCY COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 OAKLAND DIVISION  
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14 In re

15 FOX ORTEGA ENTERPRISES, INC.,  
dba PREMIER CRU,

16  
17 Debtor.  
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Case No. 16-40050-WJL

Chapter 7

**APPLICATION FOR ORDER SHORTENING  
TIME FOR NOTICE OF HEARING ON  
MOTION FOR ORDER APPROVING  
SURCHARGE AGREEMENT**

20 TO THE HONORABLE WILLIAM J. LAFFERTY, UNITED STATES BANKRUPTCY  
21 JUDGE:

22 Michael G. Kasolas, the duly appointed chapter 7 trustee of the above-captioned estate  
23 (“Trustee”), hereby requests that the Court enter an order reducing the time required for notice of  
24 hearing on his *Motion for Order Approving Surcharge Agreement* (the “Motion”), a copy of which  
25 is attached to the Declaration of Mark S. Bostick filed in support hereof.

26 The reduction of time for notice is requested in order that the Motion may be heard and  
27 determined at the same time as the professionals’ fees applications set for hearing on December  
28 14, 2016, so that distributions to the professionals may be made before the end of the year.

1 The parties to the Agreement consent to the entry of an order shortening time.

2 WHEREFORE, the Trustee submits that good cause exists to reduce the time required for  
3 notice of the Motion under Bankruptcy Rule 9006(c) and requests that an order reducing the time  
4 required for notice and setting the hearing date be entered herein.

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6 DATED: December 7, 2016

WENDEL, ROSEN, BLACK & DEAN LLP

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8 By: /s/ Mark S. Bostick

9 Mark S. Bostick

10 Attorneys for Michael G. Kasolas, Trustee

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