

<p>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-2(c) Jeffrey A. Lester, Esq. (JAL 7113) BRAVERMAN & LESTER 374 Main Street Hackensack, New Jersey 07601 (201) 487-5544 Attorneys for Trustee</p>	
<p>In Re: Florham Park Surgery Center, LLC</p>	<p>Case No.: 16-16964 JKS Judge: John K. Sherwood Chapter: 7</p>

**NOTICE OF MOTION TO REOPEN CASE
AND ALLOW CONTINUED ADMINISTRATION**

TO: Martha Hildebrandt, Esq.
Asst. United States Trustee
One Newark Center, 21st Floor
Newark, NJ 07102

Douglas J. McGill, Esq.
Webber McGill, LLC
765 Route 10, #104
Whippany, NJ 0798
Attorney for Debtor

SIRS/MADAM:

PLEASE TAKE NOTICE, that on the 12th day of June, 2018 at 10:00 a.m., or as soon thereafter as this matter may be heard, the undersigned Trustee will move before the Honorable John K. Sherwood, or such other Judge of the United States Bankruptcy Court to whom this matter may be assigned, 50 Walnut Street, 3rd Floor, Newark, New Jersey for an Order reopening the case, re-appointing Jeffrey A. Lester as Chapter 7 Trustee and directing the continued administration of the Estate by the trustee. In support thereof, Movant shall rely upon the annexed Certification and, if required by the Court, the arguments of counsel.

No brief is required in connection with this application as the issues are factual and do not need legal interpretation.

Pursuant to L.B.R. 9013, a proposed form of Order is submitted herewith. This matter will be decided on the papers unless oral argument is requested by respondent in his answering papers, or unless requested by the Court.

Braverman & Lester
Attorneys for Trustee

By: /s/ Jeffrey A. Lester
Jeffrey A. Lester, Esq.

DATED: May 14, 2018