

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION
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In re:

Ingersoll Financial, LLC,

Chapter 11

Case No.: 6:17-bk-07077-KSJ

Debtor.

DEBTOR'S MOTION TO ALLOW WITNESS TO TESTIFY BY VIDEO

The Debtor, Ingersoll Financial, LLC, files this motion to allow Todd Wohl to testify by video and says:

1. On November 14, 2018, at 2:45 P.M. ET, the Court will hold its final hearing to approve the Auction Sale of the Debtor's property.

2. Todd Wohl is principal of Braunco Inc., the Auctioneer that was hired with authority of the Court to conduct the Auction, and he has been acting in that capacity for the estate.

3. Mr. Wohl's office is located at 1230 Rosecrans Ave., Suite 160, Manhattan Beach, California. His telephone number is 866-568-6638 .

4. The nearest Federal Courthouse to Mr. Wohl is The Edward R. Roybal Federal Building and Courthouse 255 E Temple Street, Los Angeles CA 90012.

5. The Debtor will, prior to the hearing, file the proffered testimony of Mr. Wohl to address the conduct of the Auction Sale and the results thereof. The proffer will be made available to the Parties in interest prior to the hearing.

6. The Debtor intends to make Mr. Wohl available for cross examination on the proffer by video conference at the hearing on November 14, 2018 at 2:45 p.m. ET.

7. The Debtor believes that it is in the best interest of the estate to avoid the cost of Mr. Wohl's travel from California for the hearing, in that most, if not all, of his testimony will be made by proffer.

THEREFORE the Debtor requests that the Court permit Todd Wohl to testify by video at the hearing scheduled for November 14, 2018, and grant such other and further relief as may be appropriate.

CERTIFICATE OF SERVICE

I certify that a copy of this motion has been served on October 25, 2018 on all filing users through the CM/ECF filing system.

/s/ Frank M. Wolff
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