#### UNITED STATES BANKRUPTCY COURT MIDDLE DISTRICT OF FLORIDA ORLANDO DIVISION www.flmb.uscourts.gov

In re:

Ingersoll Financial, LLC

Debtor.

Chapter 11 Case no: 6:17-07077-KSJ

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### MOTION FOR AND NOTICE OF ABANDONMENT

The Debtor, Ingersoll Financial, LLC, pursuant to § 554, Bankruptcy Code, F.R.B.P. 6007,

7004 and 7005, and applicable local bankruptcy rules, gives notice of the abandonment of the

following described property:

### **NOTICE OF OPPORTUNITY TO OBJECT AND REQUEST FOR HEARING**

Pursuant to Local Rule 2002-4, the Court will consider the relief requested in this paper without further notice or hearing unless a party in interest files a response within 14 days from the date set forth on the attached proof of service, plus an additional three days for service if any party was served by U.S. Mail.

If you object to the relief requested in this paper, you must file a response with the Clerk of the Court at George C. Young Federal Courthouse, 400 West Washington Street, Suite 5100, Orlando, FL 32801, and serve a copy on the movant's attorney, Frank M. Wolff, Frank Martin Wolff, P.A., 19 E. Central Blvd., Orlando, FL 32801 and any other appropriate persons within the time allowed. If you file and serve a response within the time permitted, the Court will either schedule and notify you of a hearing, or consider the response and grant or deny the relief requested without a hearing.

If you do not file a response within the time permitted, the Court will consider that you do not oppose the relief requested in the paper, will proceed to consider the paper without further notice or hearing, and may grant the relief requested.

1. Real property located at 2616 Orleans St, Baltimore, MD 21224, (the Property)

more particularly described as:

All that certain parcel of land situated in the City of Baltimore, State of Maryland, being known and designated as follows: all that property situate in Baltimore City, State of Maryland, described as follows, that is to say: Beginning for the same on the north side of Orleans Street at the distance of thirty-nine feet Easterly from the Northeast corner of Orleans street thirteen feet thence Northerly parallel with Glover Street and through the entire of a partition wall there situate, seventy feet to the south side of an alley ten feet wide there laid out; thence Westerly binding on the South side of said alley, with the use thereof in common and parallel with Orleans street thirteen feet and thence Southerly there situate seventy feet to the place of beginning. The improvements thereon being known as 2616 Orleans Street.

2. The Property is being abandoned because it appears that the Debtor lost clear title

to the Property prior to the Petition Date, and the cost of asserting any claim to the Property outweighs any benefit to the estate.

3. This abandonment is limited to the Property and does not include any other real

property, personal property, claim or right of the Debtor.

# 4. UNLESS WRITTEN OBJECTIONS ARE FILED WITHIN FOURTEEN

## DAYS (14) DAYS FROM THE DATE OF MAILING OF THIS NOTICE, THE PROPERTY

### SHALL BE ABANDONED BY ORDER OF THE BANKRUPTCY COURT

Dated 10/30/2018.

/s/ Frank M. Wolff Frank M. Wolff Florida Bar No. 319521 Frank Martin Wolff, P.A. 19 E. Central Blvd. Orlando, FL 32801 Telephone (407) 982-4448 Facsimile (407) 386-3364 Email: fwolff@fwolfflaw.com

Attorneys for the Debtor

### **CERTIFICATE OF SERVICE**

I certify that a copy of this Notice of Abandonment was served on October 30, 2018 on all filing users through the CM/ECF filing system.

<u>/s/ Frank M. Wolff</u> Frank M. Wolff