

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION  
[www.flmb.uscourts.gov](http://www.flmb.uscourts.gov)

In re:

Ingersoll Financial, LLC

Chapter 11

Case no: 6:17-07077-KSJ

Debtor.

**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 2411 E 36th, Kansas City, MO 64101 (the Property).

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 11/1/2018.

/s/ Frank M. Wolff  
Frank M. Wolff  
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Frank Martin Wolff, P.A.  
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Attorneys for the Debtor

**CERTIFICATE OF SERVICE**

I certify that a copy of this Notice of Abandonment was served on November 1, 2018 on all filing users through the CM/CEF filing system.

/s/ Frank M. Wolff  
Frank M. Wolff