

1 Mark J. Giunta (#015079)  
Liz Nguyen (#030282)  
2 Law Office of Mark J. Giunta  
245 West Roosevelt Street, Suite A  
3 Phoenix, AZ 85003  
Phone (602) 307-0837  
4 Fax (602) 307-0838  
Email [markgiunta@giuntalaw.com](mailto:markgiunta@giuntalaw.com)  
5 Email [liz@giuntalaw.com](mailto:liz@giuntalaw.com)

6 *Attorneys for Debtor*

7  
8 IN THE UNITED STATES BANKRUPTCY COURT  
9 FOR THE DISTRICT OF ARIZONA

10 In re:	Chapter 11 Proceeding
11 JOSE DIEGO ESPINOZA,	Case No. 2:15-bk-14649-EPB
12 Debtor.	<b>SUPPLEMENT TO DISCLOSURE</b>
	<b>STATEMENT IN SUPPORT OF PLAN OF</b>
	<b>REORGANIZATION DATED MARCH 16,</b>
	<b>2016</b>

15 Jose Diego Espinoza ("Debtor"), by and through undersigned counsel, hereby  
16 supplements his disclosure statement with the following statement provided by Erika Espinoza  
17 Ayala, Jose J. Ayala, and Ayala Family Trust ("Ayala Creditors") with the below paragraph, but  
18 by doing so the Debtor does not agree to or adopt said statement:

19 "Creditors Ayala have reviewed the Debtor's disclosure statement and object to his  
20 [Debtor's] characterization that creditor Jose J. Ayala embezzled funds from the bar and  
21 restaurant while he was a partner with the Debtor. These claims are unsubstantiated. Mr. Ayala  
22 contends that the business experienced significant cash flow losses, consistent with many "start-  
23 up" businesses, which led to the Debtor purchasing Mr. Ayala's interest in the bar and restaurant  
24 and consolidating his ownership thereof."  
25

1 DATED this 25th day of October, 2016.

2 LAW OFFICE OF MARK J. GIUNTA

3 By /s/ Mark J. Giunta  
4 Mark J. Giunta, Esq.  
5 Liz Nguyen, Esq.  
6 *Attorneys for Debtors*

7 A Copy of the foregoing was electronically filed  
8 This 25<sup>th</sup> day of October, 2016 with the U.S. Bankruptcy Court.

9 COPY of the foregoing mailed (and/or served via  
10 fax\* or e-mail\*\* if so marked) 25<sup>th</sup> day of October, 2016, to:

11 Elizabeth C. Amorosi  
12 United States Trustee  
13 230 North First Avenue, Suite 204  
14 Phoenix, AZ 85003-1706

15 John D. Parker, II [\\*jpark@ptlaw.net](mailto:*jpark@ptlaw.net)  
16 P.O. Box 63098  
17 Phoenix, Arizona 85082-3098  
18 *Attorney for Erika Espinoza Ayala, Jose J.  
19 Ayala, Ayala Family Trust*

20 Patrick Murphy  
21 Guttilla Murphy Anderson  
22 5415 East High Street, Suite 200  
23 Phoenix, Arizona 85054  
24 *Attorney for Landmarc Capital and Investment  
25 Company*

26 Stanley M Hammerman, Esq.  
27 Stephanie A. Webb, Esq.  
28 Hammerman & Hultgren, P.C.  
29 3101 North Central Avenue, Suite 500  
30 Phoenix, Arizona 85012  
31 *Attorneys for Mountain States Commercial  
32 Collections, Inc.*

33 Patricia Doyle-Kossick [\\*patricia.doyle-](mailto:*patricia.doyle-kossick@azbar.org)  
34 [kossick@azbar.org](mailto:kossick@azbar.org)  
35 4500 South Lackshore Drive, Suite 575  
36 Tempe, Arizona 85282-7187  
37 *Attorney for JPMorgan Bank*

38 Alan A. Meda, Esq. [\\*ameda@bcattorneys.com](mailto:*ameda@bcattorneys.com)  
39 Burch & Cracchiolo PA  
40 702 East Osborn Road, Suite 200  
41 Phoenix, Arizona 85014  
42 *Attorney for Landmarc Capital and Investment  
43 Company*

44 Logan Schutz