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9 Attorneys for Debtor and Debtor in Possession

10
11
12 **UNITED STATES BANKRUPTCY COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA, LOS ANGELES DIVISION**
14

15 IN RE:	}	Case No.: 2:16-bk-12068-VZ
16 FELAHY LAW GROUP, APC	}	Chapter 11
17 Debtor and Debtor in Possession.	}	MOTION FOR ORDER APPROVING
18	}	(1) THE ADEQUACY OF DEBTOR'S
19	}	DISCLOSURE STATEMENT;
20	}	(2) APPROVING DEBTOR'S
21	}	SOLICITATION PACKAGE AND
22	}	NOTICE THEREOF
23	}	(3) ESTABLISHING
24	}	CONFIRMATION PROCEDURES
25	}	AND DEADLINES;
26	}	(4) FORM OF BALLOTS AND
27	}	PROCEDURE FOR TABULATION
28	}	(5) MEMORANDUM OF POINTS AND
	}	AUTHORITIES AND
	}	DECLARATION OF ALLEN
	}	FELAHY IN SUPPORT
	}	Date: December 15th, 2016
	}	Time: 1:30pm
	}	Ctrm: 1368
	}	Place: 255 E Temple Street, Los Angeles,
	}	CA 90012

29 COMES NOW Debtor and Debtor in Possession, FELAHY LAW GROUP, APC, who
30 hereby files this Motion for the entry of an order approving the adequacy of the Disclosure
31 Statement filed by Debtors and Debtor in Possession., pursuant to 11 USC sections 105, 1125

1 and 1126. Further, Debtor seeks orders governing notice procedures; confirmation procedures;
2 and all associated deadlines. More specifically, Debtor seeks orders

- 3 1. Approving Debtor's Disclosure Statement;
- 4 2. Establishing vote solicitation and notice procedures;
- 5 3. Establishing the deadline for soliciting votes;
- 6 4. Establishing the deadline by which those entitled to vote must return their ballots;
- 7 5. Approving the notice of the confirmation hearing;
- 8 6. Establishing the deadline by which the Debtor must file a motion in support of
9 confirmation of Debtor's plan; and
- 10 7. Establishing the confirmation date and related dates.

11 12 **STATEMENT OF FACTS**

13 **I. JURISDICTION**

14 This Court has subject matter jurisdiction to consider this matter pursuant to 28 USC
15 section 157 and section 1334. This is a core proceeding pursuant to 28 USC section 157(b). The
16 statutory basis for the relief sought is 11 USC sections 105, 1125 and 1126 of the Bankruptcy
17 Code, Rule 2002, 3017, and 3018 of the Federal Rules of Bankruptcy Procedure;
18 and LBR 3017-1.

19 20 **II. BACKGROUND**

21 On February 19th, 2016, FELAHY LAW GROUP, APC ("Debtor") filed a bankruptcy
22 petition under Chapter 11 of the Bankruptcy Code. Debtor is an active California Corporation
23 (Please see Exhibit "A", a copy of the California Secretary of State's Business Entity Detail,
24 attached hereto and made a part of) that ceased all business activity in and around December
25 2014. On or about April 28th, 2016, this Court entered an Order After Initial Status Conference
26 setting Deadlines for Filing Proofs of Claim; Setting Deadline for Hearing on Objections to
27 Claims; and, Setting Hearing on Motion for Order Approving Adequacy of Disclosure
28

1 Statement. Subject to the aforementioned Order, Debtor filed a Small Business Disclosure
2 Statement and Plan on August 31st, 2016. On or about September 22nd, 2016, Creditor Barbara
3 Anderson (“Creditor”) filed her Opposition to Debtor’s Small Business Disclosure Statement.
4 Debtor’s Disclosure Statement was not approved and this Court order Debtor to file an Amended
5 Disclosure Statement subject to the Court’s findings of fact and conclusions of law. Debtor will
6 file the amended disclosure statement concurrently with this motion.

7
8 **III. DEBTOR’S PLAN AND DISCLOSURE STATEMENT**

9 The Debtor will file an Amended Disclosure Statement and Plan concurrently with this
10 Motion. Debtor was a professional, legal corporation with its place of business in Long Beach,
11 California. Debtor ceased operating business in mid December 2014 and has no current plans to
12 engage in business. In or about November 15, 2014, one of the Debtor’s principle attorneys left
13 the firm resulting in a significant loss of business for Debtor. Additionally, one of Debtor’s
14 clients, Garcia Suarez Construction (“Creditor”) indicated to Debtor that it would be pursuing a
15 malpractice action against Debtor. Said malpractice action was precipitated by a letter to Debtor
16 in or about February 13th, 2015; and followed by the filing of a state court action on or about
17 March 4th, 2015.

18 Debtor’s plan includes just one class of creditors, Class 2. Administrative expenses and
19 priority tax claims, of which there is one of each are not classified, pursuant to 11 USC 1123.
20 Class 2 creditors are impaired and therefore eligible to vote on the plan. Debtor’s plan contains
21 adequate information, sufficient for members of Class 2 to make an informed judgment about the
22 plan.

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1 **IV. REQUESTED RELIEF**

2 **A. Approval of the Adequacy of Debtor’s Disclosure Statement**

3 The Debtor will file an Amended Disclosure Statement and Plan concurrently with this
4 Motion. Debtor requests that this Court find that the Disclosure Statement contains “adequate
5 information” within the meaning of 11 USC §1125 and approve the form of and authorize Debtor
6 to disseminate the Disclosure Statement pursuant to the procedures set forth in the herein motion.

7 11 U.S.C. § 1125 (a)(1) reads in part:

8 “means information of a kind, and in sufficient detail...that would enable such a hypothetical
9 investor of the relevant class to make an informed judgment about the plan, but adequate
10 information need not include such information about any other possible or proposed plan and in
11 determining whether a disclosure statement provides adequate information”

12 Sufficient information is that which will allow a hypothetical investor to make an
13 informed decision. The Debtor’s Disclosure Statement provides sufficient information about the
14 debtor’s business; its income and assets; and the source of funds to pay the proposed plan
15 payments.

16
17 **B. Approval of the Solicitation Packages and Procedures for Solicitation and Notice**

18 The Debtor also requests that this Court authorize Debtor and or their agent to
19 disseminate the Disclosure Statement and Plan, related notices and solicitation materials.

20 Bankruptcy Rule 3017(d) reads in part:

21 “Upon approval of a disclosure statement,— except to the extent that the court orders
22 otherwise with respect to one or more unimpaired classes of creditors or equity security
23 holders—the debtor in possession, trustee, proponent of the plan, or clerk as the court
24 orders shall mail to all creditors and equity security holders, and in a chapter 11
25 reorganization case shall transmit to the United States trustee,

- 26 (1) the plan or a court-approved summary of the plan;
27 (2) the disclosure statement approved by the court;
28 (3) notice of the time within which acceptances and rejections of the plan may be filed;

and

1 (4) any other information as the court may direct, including any court opinion
2 approving the disclosure statement or a court-approved summary of the opinion.

3 Debtor respectfully requests that on or before the first business day that is at least
4 fourteen (14) days after the date on which an order granting this Motion is entered (“Service
5 Date”), the Debtor or their agent will serve a solicitation package (“Solicitation Package”), on
6 the following entities: a) all known creditors (1) that have filed a proof of claim in this case,
7 other than disallowed, or waived claims, (2) or if no such proof of claim had been filed, on
8 whose behalf Debtor scheduled as holding a claim, in Debtor’s schedules of assets and liabilities;
9 b) All parties who filed a request for special notice; and, c) the Office f the Unites States Trustee
10 and governmental entities listed in FRBP 2002(j). The proposed date by which Debtor must
11 serve the Solicitation Package is December 29th, 2016. The Solicitation Package shall include
12 the following: the combined Disclosure Statement and Plan, attached hereto as Exhibit A;
13 Proposed Order on Adequacy of Debtor’s Disclosure Statement and Nature of Solicitation,
14 Balloting and Tabulation and Establishing Deadlines and procedures, attached hereto as Exhibit
15 B; Notice of the Hearing on Approval of Adequacy of Debtor’s Amended Disclosure Statement
16 and Hearing on Confirmation of Debtor’s Plan of Reorganization, attached hereto as Exhibit C; a
17 Ballot, to those creditors entitled to vote, attached hereto as Exhibit D. Debtor will also serve a
18 Notice of Non Voting to those classes not entitled to vote. As a practical matter, this notice will
19 be sent to the taxing authority who has a priority tax claim. Debtor’s other creditors fall into
20 Class 2 and are entitled to vote.

21 **C. Establishing Deadlines**

22 Subject to the approval of and in conjunction with this Motion, the Debtor requests that
23 the Court establish the following dates: the date by which Debtor must serve the Solicitation
24 Package and Confirmation Notice; the last day by which votes in favor or rejecting the Debtor’s
25 plan be received; the last day by which the ballots must be tabulated and the tabulation results be
26 filed; the date for the Hearing on Confirmation; the last day by which Debtor must file a Brief in
27 Support of Confirmation; and the date by which any party in interest must file any objections to
28 the Debtor’s Plan and date by which any reply to an objection must be filed.

1 **a. Establishing the Deadline by Which Debtor Must Serve the Solicitation**
2 **Package and the Deadline by Which Those Entitled to Vote Must Return**
3 **Their Ballots**

4 Debtor respectfully requests that on or before the first business day that is at least
5 fourteen (14) days after the Service Date on which an order granting this Motion is entered, the
6 Debtor or their agent will serve a Solicitation Package on all creditors and equity holders
7 regardless of their entitlement to vote. Said deadline is December 29th, 2016. As indicated
8 above, Class 2 is the only Class entitled to vote on Debtor's Plan of reorganization. The Debtor
9 proposes that the deadline by which ballots be returned ("Voting Deadline") to Debtor's counsel
10 be no later than 14 days after the last date by which the Debtor must serve the Solicitation
11 Package on creditors. The proposed date by which votes must be received by Debtor's counsel
12 is January 12th, 2017.

13 **b. Form of Ballots and Tabulation Thereof**

14 Debtor requests that the Court approve and authorize the use by Debtor of a ballot which
15 substantially conforms to Official Form No. 14. Please see Exhibit D, a copy of Debtor's
16 proposed ballot. Ballots must comply with the following requirements or they will not be
17 counted: a) only ballots in the form authorized by this Court, unless otherwise ordered by this
18 Court; b) only ballots received on or before the Voting Deadline as defined herein, unless
19 otherwise ordered by the Court; c) only ballots signed by the authorized representative of
20 creditor; d) only ballots which check a box indicating either the Plan is accepted, or the Plan is
21 rejected; and e) only ballots sent to Debtor's Counsel of Record via US Post, facsimile or
22 electronic mail at the below address, email or facsimile number:

23 Todd B Becker, Esq
24 The Becker Law Group
25 3750 E Anaheim Street, Suite 100
26 Long Beach, CA 90804
27 **brief@beckerlawgroup.com**
28 562-494-8904 (fax).

Debtor proposes that the January 26th, 2017, be the last date by which Debtor may file a Plan
Ballot Summary, tabulating the results of all ballots received by Debtor as defined above.

1 Debtor further requests the following tabulation procedures:

- 2 1. For a claim identified in Debtor's schedules as not contingent, not
3 unliquidated and not disputed, and that has not been disallowed, waived or
4 withdrawn by order of the Court, stipulation of otherwise prior to the
5 Confirmation Hearing, and for which no proof of claim has been timely filed,
6 the claim amount identified in Debtor's schedules;
- 7 2. For a timely filed claim that is filed in a specified, liquidate amount and that is
8 not the subject of an objection filed before the Confirmation Hearing and that
9 has not been allowed, waived or withdrawn by order of the Court, stipulation
10 or otherwise prior to Confirmation Hearing, the specified liquidated amount in
11 such proof of claim; and
- 12 3. For a claim that is the subject of an objection to claim in whole or in part
13 before the Confirmation Hearing, the undisputed amount, if any, of such claim
14 unless such claim is temporarily allowed under FRBP 3018(a).
- 15 4. If an entity submits a ballot for a claim (i) for which there is no timely proof
16 of claim filed and for which there is no corresponding schedule amount, or (ii)
17 which is the subject of an unresolved objection prior to the Confirmation
18 Hearing, such ballot will not be counted unless otherwise ordered by the
19 Court.
- 20 5. Creditors that may have claims in more than one class under the Plan must
21 submit separate ballots for voting their claims in each such class. Any
22 creditor that requires additional copies of a ballot may either photo copy the
23 original ballot or obtain an additional ballot pursuant to the instructions set
24 forth in the Confirmation Hearing Notice and the proposed ballot. If a
25 creditor uses one ballot to vote claims in more than one class, such combined
26 ballot will not be counted.
- 27 6. If an entity casts more than one eligible ballot with respect to the same claim
28 before the Voting Deadline, as established herein, the last ballot received prior

1 to the deadline shall supersede any prior ballot(s) by such entity with respect
2 to such claim.

3 7. Any ballot that is incomplete or is not received by the Voting Deadline shall
4 not be counted.

5 8. General Counsel for Debtor, Todd B Becker, shall tabulate the ballots and
6 prepare the appropriate reports with respect thereto in compliance with
7 sections 1126(c) and (d) and LBR 3018-1.

8 **c. Establishing the Date of the Confirmation Hearing & Deadline by Which**
9 **the Debtor Must File a Motion in Support of Confirmation of Debtor's**
10 **Plan; and Form of Notice of Confirmation Hearing**

11 Pursuant to FRBP 2002(b) the Debtor hereby requests that the Court set February 23rd,
12 2017 as the date of Debtor's Confirmation hearing. Debtor further requests approval of January
13 26th, 2017, as the last date by which Debtor must file Debtor's Brief in Support of Confirmation,
14 the Ballot Tabulation; and Notice of the Hearing on Confirmation. Debtor's Solicitation Package
15 includes the proposed Notice of Hearing of Confirmation Hearing on Debtor's Plan, attached
16 hereto as Exhibit B. Debtor is not assuming any contracts or leases. As such, Debtor is not
17 proposing a procedure for curing amounts under a contract or lease.

18
19 **d. Establishing the Date by Which Parties in Interest Must File any**
20 **Objections to the Debtor's Plan and Date by Which any Reply to an**
21 **Objection Must be Filed**

22 Debtor hereby requests that the Court establish February 9th, 2017, as the last date by
23 which any party in interest must file objections to the confirmation of Debtor's Plan of
24 reorganization. This date is at least 35 days after the last day for mailing the Solicitation
25 Package by the Debtor, December 29th, 2016. Debtor requests that this Court order the following
26 procedures related to any objections to confirmation of Debtor's Plan: a) any objection to
27 Debtor's Plan must be served on Debtor, Debtor's General Counsel, Todd B Becker, the United
28 States Trustee and any other objecting party; b) any such objection must be in writing and

1 accompanied by a memorandum of points and authorities which sets forth in detail the name and
2 address of the party objecting, the grounds for the objection, evidentiary support for the objection
3 in the form of declarations submitted under penalty of perjury; and the amount of the objecting
4 parties' claim or such other grounds that give the objecting party standing to assert any
5 objection; c) any objection not timely filed and served shall be deemed to be waived and to be a
6 consent to the Court's entry of an Order Confirming Debtor's Plan; d) any evidence not that is
7 not timely filed and served will be stricken from the record and will not be considered in
8 determining any contested matter at the Confirmation Hearing; and e) all declarants must be
9 available, without need for subpoena, to appear for cross examination at the Confirmation
10 Hearing. The testimony of any declarant not present at the Confirmation Hearing will be
11 stricken from the record and will not be considered in determining contested matters at the
12 Confirmation Hearing. Finally, Debtor requests that this Court set February 16th, 2017 as the last
13 date by which Debtor must file a reply to any objection to confirmation.

14
15 **D. CONCLUSION**

16 As set forth in the attached Memorandum of Points and Authorities, the relief requested
17 in this motion is fair and reasonable. The relief requested is authorized by the Federal Rules of
18 Bankruptcy Procedure, the Bankruptcy Code and Local Bankruptcy rules. The procedures
19 requested by Debtor in the above Motion for Order Approving the Adequacy of Debtor's
20 Disclosure Statement are efficient, while at the same time providing all interested parties the
21 required notice and time to evaluate Debtor's Combined Disclosure Statement and Plan. Debtor
22 respectfully requests that this Court approve Debtor's Amended Disclosure Statement and Plan
23 and Debtor's proposed Ballot Tabulation, and Notice procedures.

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THE BECKER LAW GROUP

Date: November 12th, 2016



Todd B. Becker, Esq.
Attorneys for debtors

In re: Felahy Law Group, APC	Debtor(s). CHAPTER: 11 CASE NUMBER: 2:16-bk-12068-VZ
--	--

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
3750 E. Anaheim St. Suite 100
Long Beach, CA 90804

A true and correct copy of the foregoing document entitled (*specify*): **MOTION FOR ORDER APPROVING 1)THE ADEQUACY OF DEBTOR'S DISCLOSURE STATEMENT; 2) APPROVING DEBTOR'S SOLICITATION PACKAGE AND NOTICE THEREOF; 3) ESTABLISHING CONFIRMATION PROCEDURES AND DEADLINES; 4) FORM OF BALLOTS AND PROCEDURE FOR TABULATION; 5) MEMORANDUM OF POINTS AND AUTHORITIES AND DECLARATION OF ALLEN FELAHY IN SUPPORT**

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On 11/09/2016, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

United States Trustee (LA)
Attorney for Debtor

Todd B Becker

ustpregion16.la.ecf@usdoj.gov
brief@beckerlawgroup.com

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On 11/09/2016, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Honorable Vincent P. Zurzolo
United States Bankruptcy Judge
255 E. Temple Street, Suite 1360
Los Angeles, CA 90012

Debtor
Felahy Law Group, APC
400 Cover Street, Suite 100
Long Beach, CA 90807

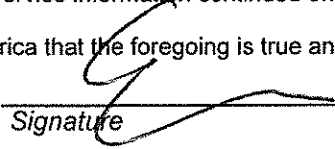
Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

November 9, 2016 Elvira Mota
Date Printed Name


Signature

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Signal Hill, CA 90755-2279

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EXHIBIT "A"

California Secretary of State Alex Padilla

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Business Entities (BE)

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- [Business Search](#)
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- [Disclosure Search](#)

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- [Starting A Business](#)

Customer Alerts

- [Business Identity Theft](#)
- [Misleading Business Solicitations](#)

Business Entity Detail

Data is updated to the California Business Search on Wednesday and Saturday mornings. Results reflect work processed through Tuesday, November 08, 2016. Please refer to **Processing Times** for the received dates of filings currently being processed. The data provided is not a complete or certified record of an entity.

Entity Name:	FELAHY LAW GROUP, A P C
Entity Number:	C3259237
Date Filed:	11/09/2009
Status:	ACTIVE
Jurisdiction:	CALIFORNIA
Entity Address:	550 S. HOPE ST. SUITE 2655
Entity City, State, Zip:	LOS ANGELES CA 90071
Agent for Service of Process:	ALLEN B FELAHY
Agent Address:	550 S. HOPE ST. SUITE 2655
Agent City, State, Zip:	LOS ANGELES CA 90071

* Indicates the information is not contained in the California Secretary of State's database.

- If the status of the corporation is "Surrender," the agent for service of process is automatically revoked. Please refer to California Corporations Code [section 2114](#) for information relating to service upon corporations that have surrendered.
- For information on checking or reserving a name, refer to [Name Availability](#).
- For information on ordering certificates, copies of documents and/or status reports or to request a more extensive search, refer to [Information Requests](#).
- For help with searching an entity name, refer to [Search Tips](#).
- For descriptions of the various fields and status types, refer to [Field Descriptions and Status Definitions](#).

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EXHIBIT "B"

1 **TODD B. BECKER, ESQ. SBN 127567**
2 **GARRETT M. BRIEF, ESQ. SBN. 180907**
3 **THE BECKER LAW GROUP**
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8 **becker@toddbeckerlaw.com**

9 **Attorneys for Debtor**

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UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION

IN RE:

FELAHY LAW GROUP, APC,

Debtor

) **Case No. 2:16-bk-12068-VZ**

) **IN A CASE UNDER CHAPTER 11 OF THE**
) **BANKRUPTCY CODE**

) **(11 U.S.C. § 1101)**

) **DEBTOR'S AMENDED DISCLOSURE**
) **STATEMENT AND PLAN**

) **Amended Disclosure Statement and Plan**
) **Hearing**

) **Date: December 15th, 2016**

) **Time: 1:30 pm**

) **Ctrm: 1368, 13th Floor**
) **255 E Temple Street**

) **Los Angeles, CA 90012**

FINPLAN 06/2006

AMENDED DISCLOSURE STATEMENT AND PLAN OF REORGANIZATION FOR
FELAHY LAW GROUP, APC

FINPLAN 06/2005

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FINPLAN 06/2006

I. INTRODUCTION

On February 19th, 2016, FELAHY LAW GROUP, APC ("Debtor") filed a bankruptcy petition under Chapter 11 of the Bankruptcy Code ("Code"). The document you are reading is both the Plan of Reorganization ("Plan") and the Disclosure Statement. Debtor ("Proponent") has proposed the Plan to treat the claims of the Debtor's creditors and, if applicable, the interests of shareholders or partners and to reorganize the Debtor's business affairs. A disclosure statement describes the assumptions that underlie the Plan and how the Plan will be executed. The Bankruptcy Court ("Court") has approved the form of this document as an adequate disclosure statement, containing enough information to enable parties affected by the Plan to make an informed judgment about the Plan. The Court has not yet confirmed the Plan, which means the terms of the Plan are not now binding on anyone.

The Proponent had reserved October 6th, 2016, at 1:30 pm in Courtroom 1368 for a hearing to determine the adequacy of Debtor's Disclosure Statement. The Court ruled that the Disclosure Statement was not adequate and scheduled a hearing on the adequacy of Debtor's Amended Disclosure Statement on December 15th, 2016, at 1:30 pm, at 255 E Temple Street, Los Angeles, CA 90012, Courtroom 1368.

Any interested party desiring further information should contact: Debtor's Counsel, The Becker Law Group, 3750 E Anaheim Street, Suite 100, Long Beach, CA 90804; 562-495-1500.

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FINPLAN 06/2006

II. GENERAL DISCLAIMER AND VOTING PROCEDURE

PLEASE READ THIS DOCUMENT, INCLUDING THE ATTACHED EXHIBITS, CAREFULLY. IT EXPLAINS WHO MAY OBJECT TO CONFIRMATION OF THE PLAN. IT EXPLAINS WHO IS ENTITLED TO VOTE TO ACCEPT OR REJECT THE PLAN. IT ALSO TELLS ALL CREDITORS AND ANY SHAREHOLDERS OR PARTNERS WHAT TREATMENT THEY CAN EXPECT TO RECEIVE UNDER THE PLAN, SHOULD THE PLAN BE CONFIRMED BY THE COURT.

THE SOURCES OF FINANCIAL DATA RELIED UPON IN FORMULATING THIS DOCUMENT ARE SET FORTH IN THE DECLARATION IN SECTION XXI BELOW. ALL REPRESENTATIONS ARE TRUE TO THE PROPONENT'S BEST KNOWLEDGE.

NO REPRESENTATIONS CONCERNING THE DEBTOR THAT ARE INCONSISTENT WITH ANYTHING CONTAINED HEREIN ARE AUTHORIZED EXCEPT TO THE EXTENT, IF AT ALL, THAT THE COURT ORDERS OTHERWISE.

After carefully reviewing this document and the attached exhibits, please vote on the enclosed ballot and return it in the enclosed envelope.

The Proponent will reserve a hearing date for a hearing to determine whether the Court will confirm the Plan, pursuant to this Court's order. Please refer to Section I above for the specific hearing date. If, after receiving the ballots, it appears that the Proponent has the requisite number of votes required by the Code, the Proponent will file a motion for an order confirming the Plan.

The Motion shall be served on at least all impaired creditors and partners or shareholders and on the Office of the United States Trustee. Any opposition to the Motion shall be filed and served on the Proponent no later than eleven days prior to the hearing date. Failure to oppose the

confirmation of the Plan may be deemed consent to the Plan's confirmation.

III. WHO MAY OBJECT TO CONFIRMATION OF THE PLAN

Any party in interest may object to confirmation of the Plan, but as explained below not everyone is entitled to vote to accept or reject the Plan.

IV. WHO MAY VOTE TO ACCEPT OR REJECT THE PLAN

It requires both an allowed and impaired claim or interest in order to vote either to accept or reject the Plan. A claim is defined by the Code to include a right to payment from the Debtor. An interest represents an ownership stake in the Debtor.

In order to vote a creditor or interest-holder must first have an allowed claim or interest. With the exceptions explained below, a claim is allowed if proof of the claim or interest is properly filed before any bar date and no party in interest has objected, or if the court has entered an order allowing the claim or interest. Please refer to Section VI below for specific information regarding bar dates in this case.

Under certain circumstances a creditor may have an allowed claim even if a proof of claim was not filed and the bar date for filing a proof of claim has passed. A claim is deemed allowed if the claim is listed on the Debtor's schedules and is not scheduled as disputed, contingent, or unliquidated. Exhibit "A" contains a list of claims that are not scheduled as disputed, contingent, or unliquidated. It should be noted that creditor Garcia Juarez Construction, Inc. holds a disputed, contingent, and unliquidated claim. This Court on or about June 2nd, 2016, entered an order allowing Creditor Garcia Juarez to continue pursuit of its action in state court. Said Order, attached hereto and made a part of as Exhibit "B" indicated the following:

"As to Movant, the stay of 11 U.S.C. 362(a) is

- Terminated as to the Debtor and the Debtor's bankruptcy estate, as modified below."

This Court's order further stated that as to Limitations on Enforcement of Judgment, "Movant is permitted to enforce its final judgment *only* (Emphasis added) by,

- "Collecting upon any available insurance in accordance with applicable non-bankruptcy law."

Finally, the Order states,

- "The stay is modified under 11 U.S.C. § 362(d)(1) and modified to the extent to allow moving party to continue prosecuting to a final judgment, including any appeal periods, the Orange County Superior Court case of Garcia Juarez Construction, Inc. v. Felahy Law Group, APC, case no. 30-2015-00775077. Moving party can satisfy any final judgment form applicable insurance proceeds."

Similarly, an interest is deemed allowed if it is shown on the list of equity security holders filed by the Debtor with the court and is not scheduled as disputed. In order to vote, an allowed claim or interest must also be impaired by the Plan.

Impaired creditors include those whose legal, equitable, and contractual rights are altered by the Plan, even if the alteration is beneficial to the creditor. A contract provision that entitles a creditor to accelerated payment upon default does not, however, necessarily render the claimant impaired, even if the Debtor defaulted and the Plan does not provide the creditor with accelerated payment. The creditor is deemed unimpaired so long as the Plan cures the default, reinstates the maturity of such claim as it existed before default, compensates for any damages incurred as a result of reasonable reliance upon the acceleration clause, and (except for a default arising from failure to operate a nonresidential lease subject to 11 U.S.C.A. § 365 (b)(1)(A) (West Supp. 2006)) compensates for any actual pecuniary loss incurred as a result of any failure to perform a non-monetary obligation.

Impaired interest-holders include those whose legal, equitable, and contractual rights are altered by the Plan, even if the alteration is beneficial to the interest holder.

There are also some types of claims that the Code requires be treated a certain way. For

that reason they are considered unimpaired and therefore holders of these claims cannot vote.

To summarize, there are two prerequisites to voting: a claim or interest must be both allowed and impaired under the Plan.

If a creditor or interest-holder has an allowed and impaired claim or interest, then he or she may vote either to accept or reject the Plan (unimpaired claimants or interest-holders are deemed to have accepted the Plan). Impaired claims or interests are placed in classes and it is the class that must accept the Plan. Members of unimpaired classes do not vote, although as stated above, they may object to confirmation of the Plan. Even if all classes do not vote in favor of the Plan, the Plan may nonetheless be confirmed if the dissenting classes are treated in a manner prescribed by the Code. Please refer to Section VI below for information regarding impaired and unimpaired classes in this case.

Section X sets forth which claims are in which class. Secured claims are placed in separate classes from unsecured claims. Fed. R. Bankr. P. 3018(d) provides: "A creditor whose claim has been allowed in part as a secured claim and in part as an unsecured claim shall be entitled to accept or reject a plan in both capacities."

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V. VOTES NECESSARY TO CONFIRM THE PLAN

The Court may confirm the Plan if at least one noninsider impaired class of claims has accepted and certain statutory requirements are met as to both nonconsenting members within a consenting class and as to dissenting classes. A class of claims has accepted the Plan when more than one-half in number and at least two-thirds in amount of the allowed claims actually voting, vote in favor of the Plan. A class of interests has accepted the Plan when at least two-thirds in amount of the allowed interests of such class actually voting have accepted it. It is important to remember that even if the requisite number of votes to confirm the Plan are obtained, the Plan will not bind the parties unless and until the Court makes an independent determination that confirmation is appropriate. That is the subject of any upcoming confirmation hearing.

VI. INFORMATION REGARDING VOTING IN THIS CASE

The bar date for filing a proof of claim in this case was June 21st, 2016.

The bar date for objecting to claims was August 26th, 2016.

In this case the Proponent believes that Class Two is impaired and therefore entitled to vote. There are no unimpaired Classes. A party that disputes the Proponent's characterization of its claim or interest as unimpaired may request a finding of impairment from the Court in order to obtain the right to vote.

Ballots must be received by the Proponent, addressed to General Counsel, Todd B Becker, Esq., 3750 E Anaheim Street, Suite 100, Long Beach, CA 90804 by TO BE DETERMINED BY THE COURT.

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**VII. DESCRIPTION OF DEBTOR'S PAST AND FUTURE BUSINESS AND EVENTS
PRECIPITATING BANKRUPTCY FILING**

The Debtor is a Professional Corporation and defined as a Small Business under 11 USCA 101 (51D).

Debtor conducted 100% of its business activity in Long Beach, California from November 2009 through mid December 2014.

What follows is a brief summary of the dates and circumstances that led Debtor to file bankruptcy. Debtor was a professional, legal corporation with its place of business in Long Beach, California. The Debtor ceased all business activity in late 2014 at which point Debtor had in excess of 30 creditors. Debtor is also the defendant in 10 lawsuits. In or about November 15, 2014, one of the Debtor's principle attorneys left the firm resulting in a significant loss of business for Debtor. Additionally, one of Debtor's clients, Garcia Juarez Construction ("Creditor") indicated to Debtor that it would be pursuing a malpractice action against Debtor. Said malpractice action was precipitated by a letter to Debtor in or about February 13th, 2015; and followed by the filing of a state court action on or about March 4th, 2015.

What follows is a brief description of the Debtor's business and future business plans. Further details relating to the Debtor's financial condition and post-confirmation operation of the Debtor are found in sections XI, XII, and XIII.

Debtor provided the last available income statements with the Disclosure Statement, dated 2013. Said statements indicate a negative net income of -\$13,598.40. Please see Exhibit "D", a copy of Debtor's 2013 Income Statement and Asset Statement. Debtor ceased operating business in mid-December 2014 and has no current plans to engage in business.

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VIII. PRE-CONFIRMATION REQUIREMENTS OF DEBTOR

Debtor has complied with the requirements of 11 U.S.C § 1116. Debtor provided to the United States Trustee, Debtor's most recent financial statements and tax returns on or about March 1st, 2016. Said documents were sent multiple times thereafter as they were not received UST. The UST confirmed receipt on or about March 9th, 2016.

Debtor timely filed all schedules and statements required of Debtor's bankruptcy petition. Debtor filed an initial petition on or about February 19th, 2016. The balance of Debtor's schedules were filed February 26th, 2016.

Debtor continues to file all appropriate monthly operating statements with the most recent being filed on July 13th, 2016.

Debtor maintains a trailing insurance policy.

IX. CRITICAL PLAN PROVISIONS

Listed below are the sources of money earmarked to pay creditors and interest-holders.

- a. Future earnings from continued operations of the Debtor: \$0.00
- b. Additional Sources of Funds are as follows: Allen Felahy as an individual will be paying the monthly plan payment contemplated by Debtor's plan. These payments are a gift and not a loan to the Debtor. Please see Exhibit "E", Declaration of Allen Felahy. Debtor's Plan payment will be made monthly by Allen Felahy from an account he will establish with sufficient funds to pay the proposed plan payments for 60 months, *Ibid*.

Most likely, general unsecured creditors can expect payment on:

- a. March 1st, 2017
- b. in the amount of \$375.00
- c. and continuing every month for 60 months.

X. DESCRIPTION AND TREATMENT OF CLAIMS

a. Overview of Plan Payments

Below is a summary of who gets paid what and when and from what source. The identity of members within a particular class is explained beginning on the next page. The second column lists two amounts. First, the amount of each payment, or if only one is to be made, then that amount; second, the total amount that will be paid. The "Payment Due Date" column states the frequency with which payments will be made and the starting and ending dates. Look at the starting date to figure out who will be paid before and after you and in what amount. The "Source of Payment" column describes the expected source of payment. Further details regarding the source of payment are found in sections XI and XII.

The timing of payments to many creditors is determined by the "Effective Date." Administrative claims, unless otherwise stated, must be paid by the Effective Date. The timing of payments to impaired creditors is measured from the Effective Date. In this case, the Effective Date is TO BE DETERMINED BY THE COURT.

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<u>Payment Recipient</u>	<u>Amount of each Payment</u> <u>(Total amount to be paid)</u>	<u>Payment Due Date</u>	<u>Source of Payment</u>
1. Todd B Becker	Subject to Fee Applications \$0.00	Subject to Interim and Final Fee Fee Applications	Gift of Allen Felahy on behalf of Debtor Please see Exhibit "E" Declaration of Allen Felahy
2. Priority Tax Debt	\$900.00 \$900.00	Effective Date	Gift of Allen Felahy on behalf of Debtor Please see Exhibit "E" Declaration of Allen Felahy
3. Class Two	\$375.00 \$22,500.00	Monthly	Gift of Allen Felahy on behalf of Debtor Please see Exhibit "E" Declaration of Allen Felahy

All claims listed below are undisputed. However, the claim of Creditor Garcia Juarez Construction is contingent and unliquidated. No claimant or interest holder is an affiliate of the Debtor.

Below is a detailed description and treatment of administrative expenses, claims and interests

b. Administrative Expenses

1. These include the "actual, necessary costs and expenses of preserving the estate" as determined by the Court after notice to creditors of a request for payment and after a hearing thereon. Debtor is informed and believes that the only Administrative expenses herein are the quarterly fees due the United States Trustee.
2. The Code requires that allowed administrative expenses be paid on the effective date unless the party holding the administrative expense agrees otherwise. The claimant has not agreed otherwise.

Unsecured Tax Claims

3. These include certain types of property, sales, and income taxes.
4. The Code requires that the holders of such claims receive regular installment payments in cash over a period ending not later than five years after the date of the order for relief, unless agreed otherwise. The claimant

has not agreed otherwise. The total cash payments must have a present value equal to the amount of the allowed claim. The treatment of this claim is in a manner not less favorable than the most favored nonpriority unsecured claim provided in this Plan (other than any cash payments to an administratively convenient class). The amount of the allowed claim includes the amount of tax owed plus interest of 0.00%. The present value is calculated as of the effective date.

Tax Claim # 1.

Claimant: Internal Revenue Service

Date(s) of order for relief: February 19th, 2017

Total amount of allowed claim as of [date]:

June 26th, 2016

Total amount of cash payments (over time) to satisfy the claim: \$100.00

Interest rate (to compensate creditor because claim is paid over time): 0.00%

First payment date: Effective Date

Amount of each installment: \$100.00

Frequency of payments: One Payment Due on the Effective Date

Total yearly payments: 0

Final Payment date: Effective Date

Tax Claim # 2.

Claimant: Franchise Tax Board

Date(s) of order for relief: February 19th, 2017

Total amount of allowed claim as of [date]:

June 26th, 2016

Total amount of cash payments (over time) to satisfy the claim: \$800.00
Interest rate (to compensate creditor because claim is paid over time): 0.00%
First payment date: Effective Date
Amount of each installment: \$800.00
Frequency of payments: One Payment Due on the Effective Date
Total yearly payments: 0
Final Payment date: Effective Date
TOTAL UNSECURED TAX CLAIM(S) \$ 900.00

c. CLASS TWO

Unsecured Claims

See Exhibit "A" for list of claimants and amount owed each.

Total amount of allowed claims: \$727,560.06
Total amount of payments (over time) to satisfy claims: \$22,500.00
Interest rate: 0.00%

Impaired

First payment date: (projected date) March 1st, 2016

Amount of each installment: \$375.00

Frequency of payments: monthly

Total yearly payments: \$4,500.00

Final payment date: 59 months after initial payment

Additional comments: Source of funds for payment shall come from Allen Felahy, an individual. Proposed payments shall result in a dividend to general unsecured creditors of 3%. If it is later determined that Creditor Garcia Juarez has an allowed claim and is permitted to collect a dividend under Debtor's Plan, the dividend to General Unsecured Creditors will decrease from 3% to 1%

XI. SOURCE OF MONEY TO PAY CLAIMS AND INTEREST-HOLDERS

The Plan cannot be confirmed unless the Court finds that it is "feasible," which means that the Proponent has timely submitted evidence establishing that the Debtor will have sufficient funds available to satisfy all expenses, including the scheduled creditor payments discussed above. What follows is a statement of projected cash flow for the duration of the Plan. The focus is on projected cash receipts and cash disbursements. All non-cash items such as depreciation, amortization, gains and losses are omitted. A positive number reflects a source of cash; a (negative number) reflects a use of cash. A more detailed statement of cash flow projections for the duration of Plan payments is attached as Exhibit "C".

Years of Plan Payments

Year#1	Year#2	Year #3	Year #4	Year #5	Year #6
2017	2018	2019	2020	2021	2022

Debtor projects that in year 1 only 11 monthly payments will be made as the first payment is projected for March 1st, 2017. Additionally, in 2022, Debtor projects that 1 monthly payment will be made. Each year after Year 1, Debtor's payment will occur monthly for 49 additional payments. The payments will be made by Allen Felahy out of a fund established by Mr. Felahy as a gift. Please see Exhibit "E", Declaration of Allen Felahy.

Net cash flow

From operating activities:

\$0.00, please see Exhibit "C"

Section XV(c)states the assumptions and details surrounding the statement of projected cash flow.

On the effective date, the Plan pays \$1,225.00

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**XII. FINANCIAL RECORDS TO ASSIST IN DETERMINING WHETHER
PROPOSED PAYMENT IS FEASIBLE**

Attached as Exhibit “D” are the following financial documents: 2013 income statement and balance sheet. Debtor does not have any income and expense documents, cash flow documents or balance sheets for years 2014, 2015 or 2016. Debtor ceased taking new cases in or about 2012 and all of Debtor’s cases were resolved prior to the end of 2013.

XIII. ASSETS AND LIABILITIES OF THE ESTATE

Assets – Debtor has no Assets - The Debtor ceased all business activity in late 2014 at which point Debtor had in excess of 30 creditors. Debtor is also the defendant in 10 lawsuits. Debtor provided the last available income statements with the Disclosure Statement, dated 2013. Said statements indicate a negative net income of -\$13,598.40. *Ibid.*

Debtor’s 2013 Income statement and Asset Statement, indicate a business in the red with no assets. As indicated above, the net income of the business was negative. Additionally, the “assets” of the company, listed in the asset documentation, were depreciated to an extent that *in 2013* (emphasis added) they had little to no value. *Ibid.* The shareholder loan listed in the 2013 income and an asset statement was forgiven in lieu of compensation to one of the partners, Allen Felahy. The forgiveness of this debt occurred more than 2 years prior to the filing of the instant case. In short, the top line gross income Debtor derived is not indicative of Debtor’s overall health as a business. Debtor employed 5-6 attorneys during 2013 in addition to support staff. In total, Debtor employed 10-12 people with salary obligations in excess of \$500,000.00. Please see Exhibit “E”, Declaration of Felahy.

a. Liabilities

Exhibit “A” shows the allowed claims against the estate, claims whose treatment is explained in detail by section X.

b. Summary

The fair market value of all assets equals \$0.00

Total liabilities equal \$ 727,560.06.

XIV. TREATMENT OF NONCONSENTING CLASSES

As stated above, even if all classes do not consent to the proposed treatment of their claims under the Plan, the Plan may nonetheless be confirmed if the dissenting classes are treated in a manner prescribed by the Code. The process by which dissenting classes are forced to abide by the terms of a plan is commonly referred to as "cramdown." The Code allows dissenting classes to be crammed down if the Plan does not "discriminate unfairly" and is "fair and equitable." The Code does not define discrimination, but it does provide a minimum definition of "fair and equitable." The term can mean that secured claimants retain their liens and receive cash payments whose present value equals the value of their security interest. For example, if a creditor lends the Debtor \$100,000 and obtains a security interest in property that is worth only \$80,000, the "fair and equitable" requirement means that the claimant is entitled to cash payments whose present value equals \$80,000 and not \$100,000. The term means that unsecured claimants whose claims are not fully satisfied at least know that no claim or interest that is junior to theirs will receive anything under the Plan, except where the Debtor is an individual, has elected to retain property included in the Estate under 11 U.S.C.A. § 1115 (West Supp. 2006) and has satisfied 11 U.S.C.A. § 1129(b)(2)(B)(ii) (West Supp. 2006). "Fair and equitable" means that each holder of an interest must receive the value of such interest or else no junior interest is entitled to receive anything.

Therefore, if a class of general unsecured claims votes against the Plan, the Plan cannot be confirmed where the Debtor or a class of interest holders (e.g. shareholders or partners) will receive or retain any property under the Plan, unless the Plan provides that the class of general unsecured claims shall be paid in full with interest. If a class of interest holders votes against the

Plan, the Plan cannot be confirmed where the Debtor will receive or retain any property under the Plan, unless the Plan provides that the class or interest holders shall be paid in full with interest. These are complex statutory provisions and the preceding paragraphs do not purport to state or explain all of them.

XV. TREATMENT OF NONCONSENTING MEMBERS OF CONSENTING CLASS (CHAPTER 7 LIQUIDATION ANALYSIS)

The Plan must provide that a nonconsenting impaired claimant or interest holder of a consenting class receive at least as much as would be available had the Debtor filed a Chapter 7 petition instead.

In a Chapter 7 case the general rule is that the Debtor's assets are sold by a trustee. Unsecured creditors generally share in the proceeds of sale only after secured creditors and administrative claimants are paid. Certain unsecured creditors get paid before other unsecured creditors do. Unsecured creditors with the same priority share in proportion to the amount of their allowed claim in relationship to the total amount of allowed claims.

A creditor would recover from the assets of the bankruptcy estate less under Chapter 7 than under Chapter 11 for three reasons. First, the liquidation value of Debtor's estate is \$0.00. Second, in a chapter 7 case a trustee is appointed and is entitled to compensation from the bankruptcy estate in an amount no more than 25% of the first \$5,000 of all moneys disbursed, 10% on any amounts over \$5,000 and up to \$50,000, 5% on all amounts over \$50,000 and up to \$1,000,000, and such reasonable compensation no more than 3% of moneys over \$1,000,000. Finally, a chapter 7 recovery may be less because an individual debtor is permitted to exempt a certain amount of the sales proceeds before unsecured creditors are paid anything.

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	Chapter 7	Chapter 11
1. value of assets	\$0.00	\$0.00
2. administrative exp. secured claims priority unsecured claims	\$900.00	\$900.00
3. chapter 7 trustee fee	n/a	n/a
4. exemption(s)	n/a	n/a

TOTAL AVAILABLE FOR DISTRIBUTION TO GENERAL UNSECURED CR.

0.00%

unsecured creditors
receive payment of
0.00% of total
claims

0.00%

unsecured creditors
receive payment of
3% of total allowed
claims under Plan

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XVI. FUTURE DEBTOR

- a. Management of Debtor – Debtor Does Not Anticipate any Future Operations

- b. Future Financial Outlook

The Proponent believes that the Debtor's economic health will remain constant from its pre-bankruptcy state for the following reasons: Debtor ceased operations in Mid December 2014 and does not anticipate any future income.

Section XI provides a summary of the projected cash flow of the Debtor for the duration of the Plan. The following assumptions underlie the projections. Debtor does not project any cash flow from the operation of its business. Debtor assumes that ongoing, monthly Plan payments will be made by Allen Felahy as an individual. As previously stated, Plan payments will come from individual, Allen Felahy. Debtor does not require a Disbursing Agent, as Debtor has ceased operations. Allen Felahy as an individual will tender monthly, Plan payments to Debtor's creditors from an account established with sufficient funds to pay the funds proposed in Debtor's Plan. Mr. Fleahy is under no obligation to make the payments and does so as a gift to the Debtor and an attempt to ensure his continued good name in the Long Beach legal community. The Proponent's financial solvency, which is relevant to its ability to honor its commitment to make up any shortfall, is demonstrated by the following facts. Please see Exhibit "E", Declaration of Allen Felahy.

XVII. SALE OR TRANSFER OF PROPERTY; ASSUMPTION OF CONTRACTS AND

LEASES; OTHER PROVISIONS – Debtor has no Unexpired leases or Executory Contracts

XVIII. BANKRUPTCY PROCEEDINGS

- Debtor filed a voluntary Chapter 11 on February 19th, 2016;

- Debtor filed a an Application to Employ General Counsel Todd Becker, on or about February 23rd, 2016;
- An Order approving the Employment of Todd b Becker, was entered on or about April 15th, 2016;
- On or about March 3rd, 2016, this Court entered an order regarding the setting of a status conference to be held on April 7th, 2016;
- On or about March 10th, 2016, creditor Garcia Juarez filed a Motion for Relief;
- On or about March 22nd, 2016, Debtor filed an opposition to Creditor's motion for relief;
- On or about April 6th, 2016, Creditor Garcia Juarez withdrew its motion for relief;
- On or about April 19th, 2016, Creditor Garcia Juarez refiled its motion for relief
- On or about April 28th, 2016, this Court entered an order After Initial Status Conference, setting a claims bard date, a date by which any objections to claims must be heard and a hearing date re the adequacy of Debtor's Disclosure Statement;
- On or about May 3rd, 2016, Debtor filed its opposition to Creditor Garcia Juarez's re-filed motion for relief;
- On or about June 2nd, 2016, this Court entered an order granting Creditor Garcia Juarez's motion for relief;
- On or about July 22nd, 2016, Debtor file an objection to the claim of CIT Finance, LLC.;
- On or about August 30th, 2016, this Court entered an order granting Debtor's motion, objecting to the claim of CIT Finance.
- A hearing on the adequacy of Debtor's Disclosure Statement was held October 6th, 2016, and this Court determined that the Disclosure Statement was inadequate
- The Court then scheduled a hearing on Debtor's Amended Disclosure Statement for December 15th, 2016.

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XIX. TAX CONSEQUENCES OF PLAN

Debtor does not anticipate any tax consequences of this Plan. Debtor has ceased operations and does not anticipate any new or continuing tax obligations or liabilities.

XX. EFFECT OF CONFIRMATION OF PLAN

a. General comments

The provisions of a confirmed Plan bind the Debtor, any entity acquiring property under the Plan, and any creditor, interest holder, or general partner of the Debtor, even those who do not vote to accept the Plan.

The confirmation of the Plan vests all property of the estate in the Debtor.

The automatic stay is lifted upon confirmation as to property of the estate. However, the stay continues to prohibit collection or enforcement of pre-petition claims against the Debtor or the Debtor's property until the date the Debtor receives a discharge, if any. If the Debtor does not seek a discharge, the discharge is deemed denied, and the stay as to the Debtor and the Debtor's property terminates upon entry of the order confirming the Plan.

b. Discharge of liability for payment of debts; status of liens; equity security holders

Debtor is not entitled to receive a discharge pursuant to 11 U.S.C.A. 1141(d)(3) (West 2004), the debtor may obtain a discharge only upon specific order of the Court.

c. Modification of the Plan

The Proponent may modify the Plan pursuant to 11 U.S.C.A. § 1127 (West 2004 & Supp. 2006).

d. Post-Confirmation Causes of Action

To the best knowledge of the Proponent, the estate has the following causes of action: Debtor has no beneficial causes of action but is the defendant in the following action: Garcia Juarez v Felahy Law Group, APC, State Case No., 30-2015-00775077, filed in the County

of Orange, State of California.

e. Final Decree

Once the Plan has been consummated, a final decree may be entered upon motion of the Proponent. The effect of the final decree is to close the bankruptcy case. After such closure, a party seeking any type of relief relating to a Plan provision can seek such relief in a state court of general jurisdiction.

XXI. DECLARATION IN SUPPORT OF DISCLOSURE STATEMENT AND PLAN

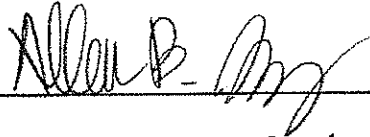
I, Allen Felahy, on behalf of Felahy Law Group, APC, declare under penalty of perjury under the laws of the United States of America that the following statements are true and based upon personal knowledge.

1. Todd B Becker, Esq General Counsel for Debtor and Allen Felahy, authorized agent for Debtor are the individuals who prepared this document.
2. The source of all financial data is Allen Felahy, Authorized Agent of Debtor.
3. All facts and representations in the Plan and Disclosure Statement are true to the best of my knowledge.
4. No fact material to a claimant or equity security holder in voting to accept or reject the proposed Plan has been omitted.
5. The name of the person(s) who prepared the cash flow projections and the other financial documents is(are) Allen

Felahy, Authorized Agent of Debtor, and such person(s) was(were)
acting within the capacity of Authorized Agent for the Debtor.

6. The accounting method(s) used to prepare the cash flow
projections and the other financial documents is accrual.

Date: 11/08/2016

A handwritten signature in black ink, appearing to read "Allen B. Felahy", is written over a horizontal line.

Allen Felahy, Authorized Agent

XXII. BALLOT FOR ACCEPTING OR REJECTING PLAN

BALLOT FOR ACCEPTING OR REJECTING PLAN

FELAHY LAW GROUP, APC filed an Amended Disclosure Statement and Plan of Reorganization on November 9th, 2016. By this ballot you will decide whether to accept or reject this Plan.

The Plan referred to in this ballot can be confirmed by the Court and thereby bind you if it is accepted by the holders of two-thirds in amount and more than one-half in number of claims in each class and the holders of two-thirds in amount of equity security interests in each class voting on the Plan.

If the requisite acceptances are not obtained, the Court may nevertheless confirm the Plan if the Court finds that the Plan accords fair and equitable treatment to the class or classes rejecting it and otherwise satisfies the requirements of 11 U.S.C.A. § 1129(b) (West 2004 & Supp. 2006).

Check the appropriate line below, which describes your interest:

_____ The undersigned, a creditor with an allowed claim in the amount of \$ _____ :

_____ The undersigned, a holder of a bond in the amount of \$ _____, with a stated maturity date of _____, registered in the name of _____, and bearing serial number(s) _____ :

_____ The undersigned, the holder of _____ shares of _____ (explain type of stock) stock, with a certificate(s) No. _____ :

Accepts the Plan

Rejects the Plan

Print or type name: _____

State which class you are a member of: _____

Signed: _____

If appropriate, by: _____ as _____

Address:

Return this ballot on or before _____ to The Becker Law Group, 3750 E Anaheim Street, Long Beach, CA 90804.

In re: Felahy Law Group, APC Debtor(s).	CHAPTER: 11 CASE NUMBER: 2:16-bk-12068-VZ
--	--

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
3750 E. Anaheim St. Suite 100
Long Beach, CA 90804

A true and correct copy of the foregoing document entitled (*specify*): **DISCLOSURE STATEMENT AND PLAN OF REORGANIZATION FOR FELAHY LAW GROUP, APC** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On 11/09/2016, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

United States Trustee (LA)
Attorney for Debtor

Todd B Becker

ustpregion16.la.ecf@usdoj.gov
brief@beckerlawgroup.com

Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL:**

On 11/09/2016, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Honorable Vincent P. Zurzolo
United States Bankruptcy Judge
255 E. Temple Street, Suite 1360
Los Angeles, CA 90012

Debtor
Felahy Law Group, APC
400 Cover Street, Suite 100
Long Beach, CA 90807

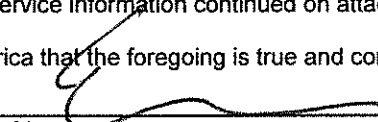
Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

November 9, 2016 Elvira Mota
Date Printed Name



Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

Thompson & Colegate LLP
c/o John A. Boyd
PO Box 1299
Riverside, CA 92502-1299

c/o LIT.ECON, LLP
Timothy Aires, Esq.
6 Huges, Suite 205
Irvine, CA 92618-2063

tkinson-Baker, Inc.
100 N. Brand Blvd 3rd Flr.
Glendale, CA 91203-1945

Barbara Anderson
c/o Law Offices of Victor George
20355 Hawthorne Blvd
First Floor
Torrance, CA 90503-3264

CIT FINANCE LLC
c/o Weltman, Weinberg & Reis Co., L.P.A.
3705 Marlane Drive
Grove City, OH 43123-8895

IT Finance, LLC
c/o LeClari Ryan LLP
Mary Simonian, Esq
25 S Figueroa St, Suite 350
Los Angeles, CA 90017-5674

Commercial Collection Corp
34 Seymour St
Tonawanda, NY 14150-2126

Dahl Administration
6465 Wayzata Blvd.
Suite 420
Minneapolis, MN 55426-1721

David Beryj
c/o Employment Lawyers Group
Karl Garber, Esq
3418 Ventura Blvd.
Sherman Oaks, CA 91423-3914

Employment Lawyers Group
Karl Garber, Esq
13418 Ventura Blvd.
Sherman Oaks, CA 91423-3914

Esquire
2700 Centennial Tower
101 Marietta Street
Atlanta, GA 30303-2720

Farmers & Merchant's Bank
102 Pine Ave
Long Beach, CA 90802-2326

Franchise Tax Board
Bankruptcy Section MS A340
PO Box 2952
Sacramento, CA 95812-2952

GB Collects LLC
145
Bradford Drive
West Berlin, NJ 08091-9269

Garcia Juarez Construction, Inc.
c/o Fred J. Knez
NEZ LAW GROUP, LLP
1780 Indiana Avenue, Suite 150
Riverside, CA 92506-4253

Garcia Juarez Corp
c/o Knez Law
Fred Knez, Esq.
PO Box 70090
Riverside, CA 92513-0090

Golden State Reporting
601 University Ave
Suite 135
Sacramento, CA 95825-6738

Light Brown & Bonesteel LLP
Jennifer Saunders, Esq.
PO Box 17939
Los Angeles, CA 90017-0939

HinesReporters.com
888 S Figueroa St
Suite 840
Los Angeles, CA 90017-5306

Internal Revenue Service
300 North Los Angeles, Street, Stop 5022
Los Angeles, CA 90012-3478

AMS
801 W Olympic Blvd
Pasadena, CA 91199-0001

KARL GERBER, ESQ
13418 VENTURA BLVD
SHERMAN OAKS CA 91423-3914

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Fred Knez, Esq.
PO Box 70090
Riverside, CA 92513-0090

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c/o Aires Law Firm
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Irvine, CA 92618-2063

Law Office of Howard Goodman
Howard Goodman, Esq
18321 Ventura Blvd.
Suite 755
Tarzana, CA 91356-4250

Law Offices of Tripodes
Peter Tripodes, Esq
1111 Tahquitz Canyon Way
Suite 121
Palm Springs, CA 92262-0102

Law Offices of Victor L. George
20355 Hawthorne Blvd
First Floor
Torrance, CA 90503-3264

LeClair Ryan LLP
Gary Simonian, Esq
725 S Figueroa St
Suite 350
Los Angeles, CA 90017-5674

Lexis Nexis
PO Box 894166
Los Angeles, CA 90189-4166

(p)MOSS AND BARNETT
150 SOUTH FIFTH STREET
SUITE 1200
MINNEAPOLIS MN 55402-4129

PITNEY BOWES, INC.
27 WATERVIEW DR., 3RD FL
SHELTON, CT 06484-4361

PRA Recovery
1045 Route 109
Suite 105
Lindenhurst, NY 11757-1040

Pacific Connecteq Inc
2740 E Spring Street
Long Beach, CA 90806-2221

RMS
1250 E Diehl Road
Suite 300
PO Box 3099
Naperville, IL 60566-7099

Reliable Plant Service
1116 8th Street
Suite E
Manhattan Beach, CA 90266-6034

Signal Attorney Service
Kelly Ruby, Esq
PO Box 91985
Long Beach, CA 90809-1985

Thomson Reuters
Payment Center
PO Box 6292
Carol Stream, IL 60197-6292

Treuting and Associates
Forensic Toxicologist
1318 Willsbrook Ct
Westlake Village, CA 91361-1425

US Legal Support
5200 N Palm Ave
Suite 110
Fresno, CA 93704-2225

United States Trustee (LA)
915 Wilshire Blvd, Suite 1850
Los Angeles, CA 90017-3560

VW Quality Maint. & Janitorial Inc.
2667 East 28th Street, Suite 522
Signal Hill, CA 90755-2279

VW Quality Maintenance
110 W Ocean Blvd.
Suite 335
Long Beach, CA 90802-7953

Vavoulis, Winer & McNulty, LLC
1111 Tahquitz Canyon Way Ste 121
Palm Springs CA 92262-0102

Barbara Anderson
c/o Law Offices of Victor L. George
20355 Hawthorne Blvd.
First Floor
Torrance, CA 90503-3264

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EXHIBIT "C"

1 **TODD B. BECKER, ESQ. SBN 127567**
2 **GARRETT M. BRIEF, ESQ. SBN. 180907**
3 **THE BECKER LAW GROUP**
4 **3750 E. ANAHEIM ST., SUITE 100**
5 **LONG BEACH, CA 90804**
6 **PH. (562) 495-1500**
7 **FAX (562) 494-8904**
8 **becker@toddbeckerlaw.com**

9 **Attorneys for Debtor**

10
11 **UNITED STATES BANKRUPTCY COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION**

13 **IN RE:**) **Case No. 2:16-bk-12068-VZ**
14)
15 **FELAHY LAW GROUP, APC,**) **IN A CASE UNDER CHAPTER 11 OF THE**
16) **BANKRUPTCY CODE**
17)
18) **(11 U.S.C. § 1101)**
19)
20) **[PROPOSED] ORDER APPROVING:**
21) **ADEQUACY OF DEBTOR'S AMENDED**
22) **DISCLOSURE STATEMENT; FORM AND**
23) **NATURE OF SOLICITATION,**
24) **BALLOTING AND TABULATION; AND**
25) **ESTABLISHING DEADLINES AND**
26) **PROCEDURES.**
27) **Amended Disclosure Statement Hearing**
28) **Date: December 15th, 2016**
) **Time: 1:30 pm**
) **Ctrm: 1368, 13th Floor**
) **255 E Temple Street**
) **Los Angeles, CA 90012**

23 This matter coming before the Court on the Motion for Order Approving, The Adequacy of
24 Debtor's Amended Disclosure Statement; Approving Debtor's Solicitation Package; Form of Ballots
25 and Tabulation Procedures; Notice Procedures; and Establishing Procedures and Deadlines.

26 This Court having reviewed the Motion, any evidence submitted in support of the Motion and
27 the record in this case; and having heard the arguments of counsel in support of the relief requested
28 in the Motion, at the above captioned hearing; the Court finds that: 1) the Court has jurisdiction

1 over this matter pursuant to 11 USC section 157 and section 1334; 2) that Debtor's Motion and
2 Notice of Motion were sufficient and appropriate; 3) the relief requested is reasonable and
3 appropriate; 4) the time periods, deadlines and procedures proposed by the Debtor are reasonable and
4 afford sufficient notice to all interested parties; 5) and that the form and dissemination procedures
5 proposed by Debtor are reasonably calculated to give interested parties notice of the applicable time
6 periods, deadlines, and procedures established by this Order; 6) and this Court finds just cause for
7 the relief requested,

8 THE COURT HEREBY ORDERS:

- 9 1. The Motion is Granted;
- 10 2. Debtor's Disclosure Statement contains adequate information as defined by 11 USC
11 1125;
- 12 3. The Debtor is hereby authorized to disseminate the Solicitation Package and related
13 notices and solicitation materials per the procedures enumerated in the Motion and establishes the
14 deadlines described I the Motion, specifically,

15 **a) The Deadline by Which Debtor Must Serve the Solicitation Package and the**
16 **Deadline by Which Those Entitled to Vote Must Return Their Ballots**

17 On or before the first business day that is at least fourteen (14) days after the Service Date on
18 which an order granting this Motion is entered, the Debtor or their agent will serve a Solicitation
19 Package on all creditors and equity holders regardless of their entitlement to vote. Said deadline is
20 December 29th, 2016. As indicated above, Class 2 is the only Class entitled to vote on Debtor's Plan
21 of reorganization. The deadline by which ballots be returned ("Voting Deadline") to Debtor's
22 counsel be no later than 14 days after the last date by which the Debtor must serve the Solicitation
23 Package on creditors. The date by which votes must be received by Debtor's counsel is January 12th,
24 2017.

25 **b) Form of Ballots and Tabulation Thereof**

26 Debtor is authorized to use a ballot which substantially conforms to Official Form No. 14,
27 identified in the Debtor's Solicitation Package as the Proposed ballot. Ballots must comply with the
28 following requirements or they will not be counted: a) only ballots in the form authorized by this

1 Court, unless otherwise ordered by this Court; b) only ballots received on or before the Voting
2 Deadline as defined herein, unless otherwise ordered by the Court; c) only ballots signed by the
3 authorized representative of creditor; d) only ballots which check a box indicating either the Plan is
4 accepted, or the Plan is rejected; and e) only ballots sent to Debtor's Counsel of Record via US Post,
5 facsimile or electronic mail at the below address, email or facsimile number:

6 Todd B Becker, Esq
7 The Becker Law Group
8 3750 E Anaheim Street, Suite 100
9 Long Beach, CA 90804
brief@beckerlawgroup.com
562-494-8904 (fax).

10 That January 26th, 2016, be the last date by which Debtor may file a Plan Ballot Summary, tabulating
11 the results of all ballots received by Debtor as defined above.

12 IT IS FURTHER ORDERED that the Debtor is authorized to employ the following
13 tabulation procedures:

14 1. For a claim identified in Debtor's schedules as not contingent, not unliquidated and not
15 disputed, and that has not been disallowed, waived or withdrawn by order of the Court, stipulation of
16 otherwise prior to the Confirmation Hearing, and for which no proof of claim has been timely filed,
17 the claim amount identified in Debtor's schedules;

18 2. For a timely filed claim that is filed in a specified, liquidate amount and that is not the
19 subject of an objection filed before the Confirmation Hearing and that has not been allowed, waived
20 or withdrawn by order of the Court, stipulation or otherwise prior to Confirmation Hearing, the
21 specified liquidated amount in such proof of claim; and

22 3. For a claim that is the subject of an objection to claim in whole or in part before the
23 Confirmation Hearing, the undisputed amount, if any, of such claim unless such claim is temporarily
24 allowed under FRBP 3018(a).

25 4. If an entity submits a ballot for a claim (I) for which there is no timely proof of claim filed
26 and for which there is no corresponding schedule amount, or (ii) which is the subject of an
27 unresolved objection prior to the Confirmation Hearing, such ballot will not be counted unless
28 otherwise ordered by the Court.

5. Creditors that may have claims in more than one class under the Plan must submit separate

1 ballots for voting their claims in each such class. Any creditor that requires additional copies of a
2 ballot may either photo copy the original ballot or obtain an additional ballot pursuant to the
3 instructions set forth in the Confirmation Hearing Notice and the proposed ballot. If a creditor uses
4 one ballot to vote claims in more than one class, such combined ballot will not be counted.

5 6. If an entity casts more than one eligible ballot with respect to the same claim before the
6 Voting Deadline, as established herein, the last ballot received prior to the deadline shall supersede
7 any prior ballot(s) by such entity with respect to such claim.

8 7. Any ballot that is incomplete or is not received by the Voting Deadline shall not be
9 counted.

10 8. General Counsel for Debtor, Todd B Becker, shall tabulate the ballots and prepare the
11 appropriate reports with respect thereto in compliance with sections 1126© and (d) and LBR 3018-1.

12 **c) Establishing the Date of the Confirmation Hearing & Deadline by Which the**
13 **Debtor Must File a Motion in Support of Confirmation of Debtor's Plan; and Form of Notice**
14 **of Confirmation Hearing**

15 Pursuant to FRBP 2002(b) the he Court sets February 23rd, 2017 as the date of Debtor's
16 Confirmation hearing. This Court further sets January 26th, 2017, as the last date by which Debtor
17 must file Debtor's Brief in Support of Confirmation, the Ballot Tabulation; and Notice of the
18 Hearing on Confirmation. Debtor's Solicitation Package includes the proposed Notice of Hearing of
19 Confirmation Hearing on Debtor's Plan

20
21 **d) Establishing the Date by Which Parties in Interest Must File any Objections**
22 **to the Debtor's Plan and Date by Which any Reply to an Objection Must be Filed**

23 The Court establishes February 9th, 2017, as the last date by which any party in interest must
24 file objections to the confirmation of Debtor's Plan of reorganization. This date is at least 35 days
25 after the last day for mailing the Solicitation Package by the Debtor, December 29th, 2016. The
26 Court further Orders the following procedures related to any objections to confirmation of Debtor's
27 Plan: a) any objection to Debtor's Plan must be served on Debtor, Debtor's General Counsel, Todd B
28 Becker, the United States Trustee and any other objecting party; b) any such objection must be in

1 writing and accompanied by a memorandum of points and authorities which sets forth in detail the
2 name and address of the party objecting, the grounds for the objection, evidentiary support for the
3 objection in the form of declarations submitted under penalty of perjury; and the amount of the
4 objecting parties' claim or such other grounds that give the objecting party standing to assert any
5 objection; c) any objection not timely filed and served shall be deemed to be waived and to be a
6 consent to the Court's entry of an Order Confirming Debtor's Plan; d) any evidence not that is not
7 timely filed and served will be stricken from the record and will not be considered in determining
8 any contested matter at the Confirmation Hearing; and e) all declarants must be available, without
9 need for subpoena, to appear for cross examination at the Confirmation Hearing. The testimony of
10 any declarant not present at the Confirmation Hearing will be stricken from the record and will not
11 be considered in determining contested matters at the Confirmation Hearing. The last date by which
12 Debtor must file a reply to any objection to confirmation is February 16th, 2017.

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EXHIBIT "D"

1 **TODD B. BECKER, ESQ. SBN 127567**
2 **GARRETT M. BRIEF, ESQ. SBN. 180907**
3 **THE BECKER LAW GROUP**
4 **3750 E. ANAHEIM ST., SUITE 100**
5 **LONG BEACH, CA 90804**
6 **PH. (562) 495-1500**
7 **FAX (562) 494-8904**
8 **becker@toddbeckerlaw.com**

9 **Attorneys for Debtor**

10
11 **UNITED STATES BANKRUPTCY COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION**

13 **IN RE:**) **Case No. 2:16-bk-12068-VZ**
14)
15 **FELAHY LAW GROUP, APC,**) **IN A CASE UNDER CHAPTER 11 OF THE**
16) **BANKRUPTCY CODE**
17) **(11 U.S.C. § 1101)**
18) **[PROPOSED] NOTICE OF HEARING ON**
19 **Debtor**) **APPROVAL OF ADEQUACY OF**
20) **DEBTOR'S AMENDED DISCLOSURE**
21) **STATEMENT; AND HEARING ON**
22) **CONFIRMATION OF DEBTOR'S PLAN**
23) **OF REORGANIZATION**
24) **Confirmation Hearing**
25) **Date:**
26) **Time: 1:30 pm**
27) **Ctrm: 1368, 13th Floor**
28) **255 E Temple Street**
) **Los Angeles, CA 90012**

29 **TO ALL INTERESTED PARTIES AND THEIR ATTORNEYS OF RECORD:**

30 Please take notice that the Hearing on the Adequacy of Debtor's Amended Disclosure
31 Statement and Plan took place in the above location on December 15th, 2016.

32 At the Hearing on the Adequacy of Debtor's Amended Disclosure State and Plan, the Court
33 considered the adequacy of the information contained in said Disclosure Statement. The Court
34 Approved the Debtor's Amended Disclosure Statement and Plan as providing adequate information
35 pursuant to 11 USC section 1125 of the Bankruptcy Code, allowing parties in interest to make an

1 informed decision regarding whether to accept or reject the Debtor's Plan. This Court further
2 authorized the Debtor to disseminate the Solicitation Package, which includes the Disclosure
3 Statement and Plan, and Ballot for voting.

4 In accordance with the Court's ruling at the Haring on Debtor's Amended Disclosure
5 Statement, NOTICE IS HEREBY GIVEN THAT:

6 1. The Court ha authorized Debtor to transmit and disseminate to you, the Amended
7 Disclosure Statement and Plan, together with the attached ballot;

8 2. Creditors who wish to vote on the Plan must return their ballots to Counsel for
9 Debtor, Todd B Becker. Creditors who wish to vote on the Plan must return their ballots to accept or
10 reject Debtor's Plan to

11 Todd B Becker, Esq;
12 The Becker Law Group
13 3750 E Anaheim Street, Suite 100
14 Long Beach, CA 90804

15 Ballots must be received no later than 5:00 pm, Pacific Standard Time, on **January**
16 **12th, 2017. Ballots received after the time and date listed above will not be counted.**

17 3. The Court will hold a hearing to consider confirmation of the Plan on February 23rd,
18 2017, at 1:30 pm, in Courtroom 1368, at 255 E Temple Street, Los Angeles, CA 90012 ("The
19 Confirmation Hearing"). The Confirmation Hearing may be continued by the Court.

20 4. The Plan Ballot Summary shall be submitted by the Debtor no later than January 26th,
21 2017;

22 5. The last date by which Debtor must file and serve a brief in support of confirmation
23 of Debtor's Plan, shall be January 26th, 2017, which shall be served on all interested parties, the
24 Debtor, the Office of the United States Trustee, and Special Notice Parties;

25 6. The last date to file and serve any objections to confirmation of the Plan and evidence
26 in support thereof, shall be February 9th, 2017. Any such objections must be served on the Debtor,
27 Debtor's Counsel, the Office of the United States Trustee, and all parties in interest. The objection
28 must be in writing and accompanied by a memorandum of points and authorities and set forth in
detail the name, and address of the party filing the objection, the grounds for the objection, signed

1 under penalty of perjury, and the amount of the objecting party's claim;

2 7. The last day by which Debtor must reply to any objections to confirmation shall be
3 February 16th, 2017;

4 8. Any objections not timely filed and served will be deemed to be waived and to be
5 consent to the Court's entry of an order confirming the Plan;

6 9. Any evidence not that is not timely filed and served will be stricken from the record
7 and will not be considered in determining any contested matter at the Confirmation Hearing; and e)
8 all declarants must be available, without need for subpoena, to appear for cross examination at the
9 Confirmation Hearing. The testimony of any declarant not present at the Confirmation Hearing will
10 be stricken from the record and will not be considered in determining contested matters at the
11 Confirmation Hearing

12

13

The Becker Law Group

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15

16

Dated:

17

Todd B. Becker, Esq.
Attorneys for Debtor and
Debtor in Possession

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EXHIBIT "E"

BALLOT FOR ACCEPTING OR REJECTING PLAN

FELAHY LAW GROUP, APC filed an Amended Disclosure Statement and Plan of Reorganization on November 9th, 2016. By this ballot you will decide whether to accept or reject this Plan.

The Plan referred to in this ballot can be confirmed by the Court and thereby bind you if it is accepted by the holders of two-thirds in amount and more than one-half in number of claims in each class and the holders of two-thirds in amount of equity security interests in each class voting on the Plan.

If the requisite acceptances are not obtained, the Court may nevertheless confirm the Plan if the Court finds that the Plan accords fair and equitable treatment to the class or classes rejecting it and otherwise satisfies the requirements of 11 U.S.C.A. § 1129(b) (West 2004 & Supp. 2006).

Check the appropriate line below, which describes your interest:

_____ The undersigned, a creditor with an allowed claim in the amount of \$ _____:

_____ The undersigned, a holder of a bond in the amount of \$ _____, with a stated maturity date of _____, registered in the name of _____, and bearing serial number(s) _____:

_____ The undersigned, the holder of _____ shares of _____ (explain type of stock) stock, with a certificate(s) No. _____:

Accepts the Plan

Rejects the Plan

Print or type name: _____

State which class you are a member of: _____

Signed: _____

If appropriate, by: _____ as _____

Address:

Return this ballot on or before _____ to The Becker Law Group, 3750 E Anaheim Street, Long Beach, CA 90804.