

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

Case No. 6:16-bk-06350-CCJ
Chapter 11

CARTER TABERNACLE CHRISTIAN
METHODIST EPISCOPAL CHURCH, INC.

Debtor.

**MOTION FOR EXTENSION OF EXCLUSIVITY DEADLINE FOR OBTAINING
APPROVAL OF THE PLAN PURSUANT TO 11 U.S.C. § 1121(d)(1)**

CARTER TABERNACLE CHRISTIAN METHODIST EPISCOPAL CHURCH, INC.
("Debtor" or "Church"), through counsel, pursuant to 11 U.S.C. § 1121(d)(1), files this Motion for Extension of Exclusivity Period for Obtaining Approval of the Plan, and as cause therefor, states as follows:

1. Pursuant to the agreement of the parties, as approved by this Court, the Debtor timely filed its Plan of Reorganization (Doc. No. 171) (the "Plan") within the exclusivity period.
2. The deadline by which the Debtor must obtain approval of its Plan by all impaired classes in order to retain exclusivity is on or before May 4, 2018 (the "Exclusivity Deadline"), pursuant to 11 U.S.C. § 1121 (c)(3). The Court has scheduled an initial confirmation hearing for May 21, 2018, which is outside the Exclusivity Deadline. Debtor is working towards a consensual confirmation and hopes to confirm the case at the initial confirmation hearing.
3. To the extent a consensual confirmation is not possible, the Court has indicated that it does not have sufficient time for an evidentiary hearing on May 21st and therefore would need to schedule an evidentiary hearing for a later date.
4. By this Motion, Debtor seeks to extend the Exclusivity Deadline through the date of

entry of a final order as to whether this Plan may be confirmed by this Court. Competing plans would cause confusion for the creditors, burden the Debtor, and create unnecessary attorneys' fees and expenses. Debtor has timely met all obligations throughout this case and maintains that cause exists for this requested extension.

WHEREFORE, Debtor, CARTER TABERNACLE CHRISTIAN METHODIST EPISCOPAL CHURCH, INC., respectfully requests that the Court extend the exclusivity period through and including the date of entry of a Final Order by this Court as to whether the Plan may be confirmed.

Dated May 3, 2018.

/s/ Ryan E. Davis

RYAN E. DAVIS

Florida Bar No. 0179851

email: rdavis@whww.com

**WINDERWEEDLE, HAINES, WARD
& WOODMAN, P.A.**

329 Park Avenue North (zip code: 32789)

Second Floor

PO Box 880

Winter Park, FL 32790-0880

Attorneys for Debtor

Telephone: (407) 423-4246

Fax: (407) 645-3728

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 3, 2018, a true copy of the foregoing has been sent via:

CM/ECF to:

US Trustee, George C. Young Federal Bldg., 400 W. Washington Street, Suite 1100, Orlando, FL 32801;

Richard B. Webber, II, Esquire, a/f American First Federal, Zimmerman Kiser & Sutcliffe, PA, 315 East Robinson Street, Suite 600, Orlando, FL 32801 [rwebber@zkslawfirm.com]

US Mail to:

Carter Tabernacle Christian Methodist Episcopal Church, Inc., 1 South Cottage Hill Road, Orlando,
FL 32805

All Creditors and Parties in Interest listed on the mailing matrix attached hereto

/s/ Ryan E. Davis

RYAN E. DAVIS

Label Matrix for local noticing
113A-6
Case 6:16-bk-06350-CCJ
Middle District of Florida
Orlando
Thu May 3 19:15:52 EDT 2018

Winderweedle, Haines, Ward & Woodman, PA
Attn: Ryan E. Davis
PO Box 880
Winter Park, FL 32790-0880

Carter Tabernacle Christian Methodist Episco
1 South Cottage Hill Rd
Orlando, FL 32805-2068

Michael A Tessitore
Moran Kidd Lyons Johnson & Berkson PA
111 N Orange Ave, Suite 900
Orlando, FL 32801-2307

A & D Solutions
653 W. Michigan Street
Orlando, FL 32805-6203

ACS Technologies
PO Box 202010
Florence, SC 29502-2010

ADT
PO Box 371878
Pittsburgh, PA 15250-7878

AIT Life Safety/Fire Alarm
4617 Park Breeze Court
Orlando, FL 32808-1085

All States Lighting
3780 Silver Star Road
Orlando, FL 32808-6607

AmeriGas
2812 Silver Star Road
Orlando, FL 32808-3995

American Church, Inc.
PO Box 4014
Carol Stream, IL 60197-4014

American First Federal
155 B Avenue Suite 310
Lake Oswego, OR 97034-3181

American First Federal Inc
c/o Marc D. Chapman
Dean Mead Egerton Bloodworth
420 S Orange Ave Ste 700
Orlando FL 32801-4911

American First Federal, Inc -
c/o Zimmerman, Kiser Sutcliffe
315 E Robinson St, Ste. 600
Orlando, FL 32801-4341
Attn: Richard B. Webber II

American First Federal, Inc.
c/o Joel C. Zwemer, Esq.
Dean Mead
1903 S. 25th St, Suite 200
Fort Pierce, FL 34947-4740

Anthem Blue Cross
PO Box 6406
Carol Stream, IL 60197-6406

Banner International
2038 Gulfview Drive
Holiday, FL 34691-9724

Bighthouse Networks
PO Box 30574
Tampa, FL 33630-3574

CIT
21146 Network Place
Chicago, IL 60673-1211

CIT Finance, LLC -
CIT Finance LLC
C/O Bankruptcy Processing Solutions, Inc
PO Box 593007
San Antonio, TX 78259-0200

Cokesbury
Payment Processing Center
PO Box 2252
Birmingham, AL 35246-0069

Department of Publications
PO Box 161212
Memphis, TN 38186-1212

Federal Express
PO Box 660481
Dallas, TX 75266-0481

Florida Department of Revenue
Bankruptcy Unit
Post Office Box 6668
Tallahassee FL 32314-6668

Gem Supply -
1312 W. Washington Street
Orlando, FL 32805-1736

Internal Revenue Service -
Post Office Box 7346
Philadelphia PA 19101-7346

Jacksonville/Orlando Distric
PO Box 77085
Jacksonville, FL 32226-7085

Michael A. Tessitore Esq
Moran Kidd Lyons & Johnson, P.A.
111 N. Orange Ave., Suite 900
Orlando, FL 32801-2307

Navitas Lease Corp
PO Box 935204
Atlanta, GA 31193-5204

Orange County Tax Collector -
PO Box 545100
Orlando FL 32854-5100

Orlando Utilities
PO Box 31329
Tampa, FL 33631-3329

Pinkie P. Freeman
7300 Katy Noll Court
Orlando, FL 32818-8723

Premium Assignment Corp.
PO Box 8000
Tallahassee, FL 32314-8000

Rose Oak Florist
3927 W. Columbia Street
Orlando, FL 32805-3425

Ryan E. Davis
Winderweedle Haines Ward & Woodman PA
PO Box 880
Winter Park, FL 32790-0880

Star 2 Star Communications
Dept. CH 16873
Palatine, IL 60055-6873

Terminix
5790 Hoffner Ave
Orlando, FL 32822-4824

The Battery Bank
2565 Pemberton Drive
Apopka, FL 32703-9458

The Fifth Episcopal District
PO Box 13383
Birmingham, AL 35202-3383

Marc D Chapman +
Marc D Chapman, Esq
420 S Orange Ave Suite 700
Orlando, FL 32801-4911

Ryan E Davis +
Winderweedle Haines Ward & Woodman P.A.
329 Park Avenue North, Second Floor
Winter Park, FL 32789-7421

Joel C Zwemer +
Dean Mead Minton and Zwemer
1903 South 25th Street
Suite 200
Fort Pierce, FL 34947-4740

United States Trustee - ORL +
Office of the United States Trustee
George C Young Federal Building
400 West Washington Street, Suite 1100
Orlando, FL 32801-2210

Elena L Escamilla +
Office of the United States Trustee
400 W. Washington Street
Suite 1100
Orlando, FL 32801-2440

Richard B Webber II +
Zimmerman Kiser & Sutcliffe PA
315 East Robinson Street
Suite 600
Orlando, FL 32801-4341

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(u)American First Federal, Inc.

(u)CRE Solutions & Analytics, LLC

(u)Christopher D. Starkey

(du)American First Federal, Inc.

(d)Carter Tabernacle Christian Methodist Epis
1 South Cottage Hill Rd
Orlando, FL 32805-2068

(d)Michael A Tessitore +
Moran Kidd Lyons Johnson & Berkson PA
111 N. Orange Avenue
Suite 900
Orlando, FL 32801-2307

(u)Cynthia C. Jackson +
Orlando

(u)Note: Entries with a '+' at the end of the
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