UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF FLORIDA GAINESVILLE DIVISION

IN RE:

23 FARMS, LLC,

Debtor.

CASE NO.: 17-10015-KKS Chapter 11 JUDGE: Karen K. Specie

LIMITED OBJECTION OF WESTERN EQUIPMENT FINANCE COMPANY, INC. TO DISCLOSURE STATEMENT

Secured Creditor, Western Equipment Finance Company, Inc., hereby objects to the Debtor's Disclosure Statement and as grounds therefore, states that the Debtor has incorrectly asserted the value of Western Equipment Finance Company, Inc.'s collateral to be only \$40,000.00. Western Equipment Finance Company, Inc. believes the value of the equipment to be of greater value than \$40,000.00 as set forth in its Proof of Claim filed in this case.

WHEREFORE, Western Equipment Finance Company, Inc., requests that the Disclosure Statement be amended to correct the value of Western Equipment Finance Company, Inc.'s collateral, and for such other relief as is proper.

Dated this 26^{11} day of January, 2018.

Daryl J. Krauza, Esq. Fla. Bar No. 0147168 <u>dkrauza@deanmead.com</u> DEAN, MEAD, MINTON & ZWEMER 1903 South 25th Street, Suite 200 Fort Pierce, Florida 34947 Tele: (772) 464-7700 Fax: (772) 464-7877

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the Limited Objection of Western Equipment Finance Company, Inc. to Disclosure Statement was served on January 25, 2018, via electronic filing on all parties currently listed to receive e-mail notice/service for this case and by U.S. Mail to all interested parties who are non-CM/ECF participants, as listed below:

Electronic Mail Notice List:

Noel R. Boeke, Esq. on behalf of Creditor Growers Fertilizer Corporation; noel.boeke@hklaw.com, wendysue.henry@hklaw.com, doris.yates@hklaw.com

Seldon J. Childers, Esq. on behalf of Creditor Donald R. Green jchilders@smartbizlaw.com, melissa.kulczycke@martbizlaw.com, ellen.lord@smartbizlaw.com

Lisa Caryl Cohen, Esq. on behalf of Debtor 23 Farms, LLC lisacohen@bellsouth.net

Jason H. Egan, Esq. on behalf of the United States Trustee, 110 E. Park Avenue, Suite 128, Tallahassee, FL 32301 Jason.h.egan@usdoj.gov

Eric Golden, Esq. on behalf of Creditor Regions Bank egolden@burr.com, jmorgan@burr.com

John C. Hanson, II, Esq. on behalf of Creditor John Deere Financial jhanson@barthet.com

John H. Mueller, Esq. on behalf of Crop Production Services, Inc. jmueller@clarkmueller.com, jhmassistant@clarkmueller.com

Christopher R. Thompson, Esq. on behalf of Creditor Regions Bank crthompson@burr.com, ccrumrine@burr.com, jmorgan@burr.com

Office of United States Trustee, 110 E. Park Avenue, Suite 128, Tallahassee, FL 32301; USTPRegion21.TL.ECF@usdoj.gov

Non-CM/ECF Parties - Via U.S. Mail:

Lisa Cohen Ruff & Cohen 4010 W Newberry Road, Ste G Gainesville, FL 32607

23 Farms, LLC 8380 SE 110th Street Newberry, FL 32669-7406

Daryl . Krauza, Esq. Fla. Bar No. 0147168

F0294969.v1