

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE)
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 BELIEVERS BIBLE)
 CHRISTIAN CHURCH, INC.)
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 Debtor.)
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CASE NO. 16-65531-wlh

CHAPTER 11

NOTICE OF HEARING

PLEASE TAKE NOTICE that Believers Bible Christian Church, by and through its undersigned counsel, has filed its *Fifth Motion to Extend Exclusivity Period* and related papers with the Court.

PLEASE TAKE FURTHER NOTICE that the Court will hold a hearing on the motion in Courtroom **1403**, United States Courthouse, 75 Ted Turner Drive, SW, Atlanta, Georgia 30303 at **1:30 P.M.** on **December 7, 2017**.

Your rights may be affected by the court’s ruling on these pleadings. You should read these pleadings carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.) If you do not want the court to grant the relief sought in these pleadings or if you want the court to consider your review, then you and/or your attorney must attend the hearing. You may also file a written response to the pleading with the Clerk at the address stated below, but you are not required to do so. If you file a written response, you must attach a certificate stating when, how and on whom (including addresses) you served the response. Mail or deliver your response so that it is received by the Clerk. The address of the Clerk’s Office is: Clerk, U. S. Bankruptcy Court, Room 1340 Russell Federal Building, 75 Ted Turner Drive, S.W., Atlanta, Georgia 30303. You must also mail a copy of your response to the undersigned at the address stated below.

On this 16th day of November, 2017.

Macey, Wilensky & Hennings, LLC

/s/ William A. Rountree
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FIFTH MOTION TO EXTEND EXCLUSIVITY PERIOD

COMES NOW, Believers Bible Christian Church, Inc., Debtor and Debtor-in-Possession in the above-captioned Chapter 11 case (“Debtor”), and brings this Fifth Motion to Extend Exclusivity Period pursuant to 11 U.S.C. § 1121, and in support thereof respectively shows the Court as follows:

1. Debtor filed a voluntary petition pursuant to Chapter 11 of Title 11 of the United States Code on September 2, 2016 (the “Petition Date”). Since the Petition Date, Debtor has continued to manage its business as Debtor-in-Possession pursuant to 11 U.S.C. §§ 1107 and 1108.
2. The Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This is a "core" proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.
3. Debtor is still attempting to negotiate a plan with its major creditors.
4. Debtor is currently working with a Real Estate Agent to negotiate the sale of two parcels of land and the projected sale date is indeterminate.
5. Pursuant to 11 U.S.C. § 1121(b), Debtor would have the exclusive right to file a Plan of Reorganization until after 120 days following the date of the Order for Relief.

6. On October 31, 2016, Debtor filed its First Motion to Extend Exclusivity Period [Doc. No. 36]. On December 21, 2016, the Court entered an Order [Doc. No. 45] extending the exclusivity period and solicitation deadline ninety (90) days each through and including, respectively, April 3, 2017 and May 3, 2017.
7. On March 2, 2017, Debtor filed its Second Motion to Extend Exclusivity Period [Doc. No. 55]. On March 27, 2017, the Court entered an order [Doc. No. 57] extending the exclusivity period and solicitation deadline an additional ninety (90) days through and including, respectively, July 3, 2017, and August 1, 2017.
8. On May 24, 2017, Debtor filed its Third Motion to Extend Exclusivity Period [Doc. No. 61]. On June 19, 2017, the Court entered an order [Doc. No. 62] extending the exclusivity period and solicitation deadline an additional ninety (90) days through and including, respectively, October 2, 2017, and October 30, 2017.
9. On September 15, 2017, Debtor filed its Fourth Motion to Extend Exclusivity Period [Doc. No. 76]. On October 16, 2017, the Court entered an order [Doc. No. 79] extending the exclusivity period and solicitation deadline an additional ninety (90) days through and including, respectively, December 31, 2017, and January 30, 2018.
10. Accordingly, Debtor requests that the Court extend its exclusivity period pursuant to 11 U.S.C. § 1121(b) an additional ninety (90) days, through and including March 31, 2018, and extend its solicitation deadline through and including April 30, 2018. This is Debtor's fifth request for an extension of these deadlines.

WHEREFORE, the Debtor prays that the Court extend its exclusivity period per 11 U.S.C. § 1121 an additional ninety (90) days, through and including April 2, 2018; extend its solicitation

deadline through and including April 30, 2018; and grant such other and further relief as the Court may deem just and proper.

Respectfully submitted,

On this 16th day of November, 2017.

Macey, Wilensky & Hennings, LLC

/s/ William A. Rountree

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