

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-2(c)  
**WASSERMAN, JURISTA & STOLZ, P.C.**  
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**Counsel to Debtor-in-Possession**  
**DANIEL M. STOLZ, ESQ.**  
**LEONARD C. WALCZYK, ESQ.**

In Re:

ALTOMARE AUTO GROUP, LLC, d/b/a  
UNION VOLKSWAGEN,

Debtor.

Chapter 11

Case No. 16-22376 JKS

Honorable John K. Sherwood

Hearing Date: February 21, 2018  
10:00 a.m.

**NOTICE OF DEBTOR'S MOTION FOR SIXTH  
EXTENSION OF EXCLUSIVITY PERIODS**

TO: Office of the U.S. Trustee  
One Newark Center  
Suite 2100  
Newark, NJ 07102

**ALL PARTIES ON ATTACHED SERVICE LIST:**

**PLEASE TAKE NOTICE**, that on the date specified on *February 21, 2018 at 10:00 a.m.*, the undersigned, as counsel for ALTOMARE AUTO GROUP, LLC, d/b/a UNION VOLKSWAGEN (hereinafter "AAG"), the Debtor-in-Possession in the above captioned Chapter 11 case (the "Case"), shall move before the Honorable John K. Sherwood, United States Bankruptcy Judge, United States Bankruptcy Court, King Federal Building, 50 Walnut Street, 3<sup>rd</sup> Floor, P.O. Box 3152, Newark, New Jersey 07102, seeking the entry of an Order Granting Fifth Extension of Exclusivity Periods to file and obtain confirmation of Plan of Reorganization, and for such other relief that is just and proper.

**PLEASE TAKE FURTHER NOTICE**, that the undersigned shall rely upon the Motion filed herewith in support of the relief sought.

**PLEASE TAKE FURTHER NOTICE**, that oral argument is requested.

**PLEASE TAKE FURTHER NOTICE**, that no brief is being filed herewith since the legal basis upon which relief should be granted is set forth in the Motion.

**PLEASE TAKE FURTHER NOTICE**, that all objections must be in writing, filed with the Clerk of the United States Bankruptcy Court, King Federal Building, 50 Walnut Street, 3<sup>rd</sup> Floor, P.O. Box 1352, Newark, New Jersey 07102, and a copy thereof must simultaneously be served upon Wasserman, Jurista & Stolz, P.C., Attn: Leonard C. Walczyk, Esq., 110 Allen Rd., Ste. 304, Basking Ridge, New Jersey 07920.

**PLEASE TAKE FURTHER NOTICE**, that in the absence of any objections, the relief requested hereunder may be granted without further notice.

Respectfully submitted,

**WASSERMAN, JURISTA & STOLZ, P.C.**  
Counsel for Debtor-in-Possession,  
Altomare Auto Group, LLC d/b/a Union  
Volkswagen

Date: January 22, 2018

By: /s/ Leonard C. Walczyk.  
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Woodcliff Lake NJ 07677

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## Service List Page 2 of 7

10 Missions Media  
Commercial Recovery Bureau  
PO Box 59104  
Dallas, TX 75229

410 Clermont  
410 Clermont Terrace  
Union, NJ 07083

ABC Firelife  
PO Box 05229  
Brooklyn, NY 11205

AJR International  
300 Regency Drive  
Glendale Heights, IL 60139

Alexander Seabra  
33 Lebeda Dr West  
Fairfield, NJ 07004

Alldata  
9650 W. Taron Drive  
Elk Grove, CA 95757

Altomare 22 Union, LLC  
2155 Route 22 West  
Union, NJ 07083

American Wear  
261 No 18th St.  
East Orange, NJ 07017

Andres Branco-Rodriguez  
43 South St., 2nd Fl.  
Newark, NJ 07102

Arnum Wapples  
5 N. Koewing Place  
West Orange, NJ 07052

Autobytel  
PO Box 30860  
Los Angeles, CA 90030

Autopart  
PO Box 419250  
Boston, MA 02241

Autopoint  
10808 S. River Front Pkwy  
Suite 500  
South Jordan, UT 84095

Autotrader.com  
PO Box 932207  
Atlanta, GA 31193-2207

Autozone  
2501 Rt. 22 West  
Union, NJ 07083

Bank of the West  
475 Sansome St., 19th Fl  
San Francisco, CA 94111

BC Tire  
1266 Stelton Road  
Piscataway, NJ 08854

Benham's Garage  
414 Springfield Ave  
Berkeley Heights, NJ 07922

Bisogno, Loeffler & Zelle, LLC  
88 South Finley Avenue  
P.O. Box 408  
Basking Ridge, NJ 07920

Brad Anderson Gemelli  
215 24th St., Apt 720  
New York, NY 10010

Brandon Cleaning  
2 Roxboro Road  
Lawrence Township, NJ 08648

Brass Castle Import Salvage  
577 Brass Castle Road  
Oxford, NJ 07863

Bronx Glass  
1353 Randall Ave  
Bronx, NY 10474

Brooke Emery  
4 Yacht Club Dr  
Lake Hopatcong, NJ 07849

Buywise Auto Parts  
2087 Springfield Ave  
Vauxhall, NJ 07088

Capital One Auto Finance  
7933 Preston Road  
Plano, TX 75024

Car.com  
PO Box 30860  
Los Angeles, CA 90030-0860

Carfax  
16630 Collection Center Dr  
Chicago, IL 60693

Carlos Buenano  
501 White St  
Orange, NJ 07050

Carsdirect  
Dept LA 23419  
Pasadena, CA 91185

CDK Global  
PO Box 88921  
Chicago, IL 60695-1921

Celso Castro  
22 Briarheath Ln  
Clark, NJ 07066

Central Collection  
300 W. Preston St  
Baltimore, MD 21201

Chip Master  
998 Box 1225  
Fair Lawn, NJ 07410

Christopher Oluwaseun Awe  
124 Lincoln St  
East Orange, NJ 07017

Classic Auto Service  
999 Rahway Ave  
Union, NJ 07083

Classified Ventures  
2631 Solution Center  
Chicago, IL 60693

Cleanedge  
3121 Wilmarco Dr  
Baltimore, MD 21233

Connectone Bank  
2455 Morris Avenue  
Union, NJ 07083

Costco  
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San Diego, CA 92121

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Elizabeth, NJ 07207

DCH Millburn Audi  
2211 Millburn Ave  
Maplewood, NJ 07040

Dealer Rater  
203 Crescent St  
Waltham, MA 02453

DMT Automotive  
170 Route 22 East  
Springfield, NJ 07081

Douglas Volkswagen  
491 Morris Ave  
Summit, NJ 07901

Dunkin Donuts  
130 Route 22 Center Lane  
Springfield, NJ 07081

Ehtisham Sayyed  
16 Marison Pl., Apt. 2  
Jersey City, NJ 07306

Every Car Listed  
1001 Ese Loop 323  
Tyler, TX 75701

Expert Scratch & Chip Corp.  
PO Box 571  
Hawthorn, PA 16230

Factory Motor Parts  
PO Box 9107  
Minneapolis, MN 55480

Federal Fire  
PO Box 470  
Berkeley Heights, NJ 07922

Fedex  
P.O. Box 371461  
Pittsburgh, PA 15250

Fil, Inc.  
c/o Edvie M. Castro, Esq.  
Carlin & Ward, PC  
PO Box 751  
Florham Park, NJ 07932

Filterfresh  
204 Columbus Avenue  
Roselle, NJ 07203

Flagship Credit Accepable, LLC  
PO Box 975658  
Dallas, TX 75397

Flemington BMW  
216 Route 202  
Flemington, NJ 08822

Flemington Chevrolet  
211 Route 202  
Flemington, NJ 08822

Flemington Chrysler  
204 Route 202/31  
Flemington, NJ 08822

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Flemington Ditschman  
215 Highway 202  
Flemington, NJ 08822

Flemington Nissan  
215 US 202  
Flemington, NJ 08822

Flemington Porsche  
213 Route 202  
Flemington, NJ 08822

Forrest & Blake Marketing  
77 Brant Ave., Suite 105  
Clark, NJ 07066

Grazyna Kosieki  
18 Shelly Dr.  
New Providence, NJ 07974

Great American Business Products  
PO Box 4422  
6701 Concord Park Drive  
Houston, TX 77210

Greg Killian  
21 Madison Ct  
Newtown, PA 18940

Heartland Business Credit  
c/o Fein, Such, Kahn & Shepard PC  
7 Century Dr., Suite 201  
Parsippany, NJ 07054

Ideal Image, Inc.  
Accounts Receivable  
115 Haas Drive  
Englewood, OH 45322

IHeart Radio  
7 Century Dr  
Suite 201  
Parsippany, NJ 07054

Image Systems  
655 Business Center Drive  
Horsham, PA 19044

IP Networked Services  
88752 Expedite Way  
Chicago, IL 60695-1700

It's Easy Out of State MV  
30 Rockefeller Plaza  
Concourse Level  
New York, NY 10112

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Springfield, NJ 07081

John Nix  
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Piscataway, NJ 08854

Juaquadah Cox  
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Maplewood, NJ 07040

Karsay Coffee  
1050 Hamilton St  
Somerset, NJ 08875

Keytrak  
PO Box 4346  
Houston, TX 77210-4346

Lash VW  
376 Tarrytown Rd  
White Plains, NY 10607

Law Office of John McGovern  
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Newark, NJ 07102

Leonardo Tilesio  
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Staten Island, NY 10305

Lightning Mechanical  
65 Newark Way  
Maplewood, NJ 07040

Linden Volkswagen  
900 East Elizabeth Ave  
Linden, NJ 07036

LKQ Potomac German Auto  
4305 Lime Kiln Road  
Frederick, MD 21703

Lorco Petroleum Services  
450 South Fron St  
Elizabeth, NJ 07202

McCoy Motorsports  
559 North Mayo TR  
Pikeville, KY 41501

## Service List Page 5 of 7

Metropolitan  
PO Box 129  
Chanhassen, MN 55317

Michael Power, Esq.  
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Glen Mills, PA 19342

Michelle Lamota  
195B Main St  
Little Falls, NJ 07424

Micro Graphic  
244 Saddle River Road  
Saddle Brook, NJ 07663

Missions Media  
1043 Grand Ave  
Saint Paul, MN 55105

MMG Collections

Multi Subaru  
2685 US Route 22  
Union, NJ 07083

Nadiya Lukyanenko  
20 Claire Ave, Apt. A5  
Woodbridge, NJ 07095

New England Car Co.  
344 Broad St  
Manchester, CT 06040

New Millennium  
551 Pennsylvania Ave  
Elizabeth, NJ 07208

Nextgear Capital  
11799 North College Avenue  
Carmel, IN 46032

Nick Stroboulis  
11 Bunker Kill Dr  
Manalapan, NJ 07726

NJ Car  
PO Box 7510  
856 River Road  
Trenton, NJ 08628

NJ Car  
770 River Road  
Trenton, NJ 08628-3347

Northside Imports  
835 New Durham Road  
Edison, NJ 08817

OEC Connection  
PO Box 92315  
Cleveland, OH 44193

One Command  
PO Box 671240  
Dallas, TX 75267

Paola Candamil  
68 E. 22nd St., Apt. 3  
Bayonne, NJ 07002

Patrick Codjoe  
2145 Gillian Lane  
Easton, PA 18040

Peak Performance  
PO Box 2880  
Agoura Hills, CA 91376

Peotter's Auto Body  
186 Broad St  
Summit, NJ 07901

Quality Auto Glass  
2300 S. Clinton Avenue  
South Plainfield, NJ 07080

RCC Services, LLC  
PO Box 75013  
Fort Thomas, KY 41075

Redicare  
616 Corporate Way, Suite 6  
Valley Cottage, NY 10989

Redline  
230 Kings Highway East  
Haddonfield, NJ 08033

Republic Services  
5 Industrial Drive  
New Brunswick, NJ 08901

Reydel Volkswagen  
2034 NJ 27  
Edison, NJ 08817

Rhett Omark  
19 S Cottenet St  
Irvington, NY 10533

Ricoh/Wells Fargo Financial Service  
PO Box 41564  
Philadelphia, PA 19101

Riverside  
1600 Route 208 North  
Hawthorne, NJ 07506

S. Brown & Associates, Inc.  
4 Century Drive  
Parsippany, NJ 07054

Safety-Kleen Corporation  
PO Box 382066  
Pittsburgh, PA 15250

Santander Consumer USA, Inc.  
4201 Rufe Snow Drive  
Suite 400  
North Richland Hills, TX 76180

Sarah Brand  
17 Waverly Pl., Apt. 8  
Madison, NJ 07940

Schiller & Pittenger, P.C.  
1771 Front Street, Suit D  
Scotch Plains, NJ 07076

Seat Surgeon  
PO Box 563  
Rocky Hill, NJ 08553

Shred It  
81 Walsh Dr  
Parsippany, NJ 07054

Siegel  
197 Ford Road  
Breinigsville, PA 18031

Smart Water  
1 Beekman Road, Suite 4  
Kendall Park, NJ 08824

Snap On  
27001 Network Place  
Chicago, IL 60673-1270

Staples Advantage  
Dept. NY PO Box 415256  
Boston, MA 02241-5256

State of New Jersey  
Sales & Use Tax  
CN 999  
Trenton, NJ 08695-0999

State of New Jersey  
Division of Taxation  
50 Barrack Street  
PO Box 269  
Trenton, NJ 08695-0269

Stephne Abo  
713 Girard Ave  
Westfield, NJ 07090

Steven Kallert  
20 Jensen Lane  
Union, NJ 07083

Sunoco  
2350 Route 22 Center Island  
Union, NJ 07083

The Mironov Group, LLC  
2025 Lincoln Highway  
Suite 330  
Edison, NJ 08817

The Warranty Group  
175W Jackson Blvd  
11th Floor  
Chicago, IL 60604

Thomas Greco  
244 Chestnut St  
Nutley, NJ 07110

Time Fastener CP, Inc.  
Longley Lane  
Reno, NV 89511

Tire Management, LLC  
PO Box 404  
Saddle Brook, NJ 07663

Tire Rack Wholesale  
7101 Vorden Parkway  
South Bend, IN 46628

Township of Union  
1976 Morris Ave  
Union, NJ 07083

Tradepending  
PO Box 2881  
Chapel Hill, NC 27515

Travelers Insurance  
Kazlow Fields  
8100 Sandpiper Circle, Suite 204  
Nottingham, MD 21236

True Car  
Dept LA 24198  
Pasadena, CA 91185

TSD Rental  
1620 Turnpike St  
North Andover, MA 01845

Unique Alloy  
603 Washington Ave  
Bldg. 9C  
South Amboy, NJ 08879-3000

United Radio  
5705 Enterprise Parkway  
East Syracuse, NY 13057

United Service Workers Union  
138-50 Queens Boulevard  
Briarwood, NY 11435



US Coffee  
51 Alpha Plaza  
Hicksville, NY 11801

V Auto  
PO Box 935202  
Atlanta, GA 31193

Veldman's Auto Parts, Inc.  
25926 IN-2  
South Bend, IN 46619

Viking Pest Control  
PO Box 230  
Bound Brook, NJ 08805

Volkswagen of America  
300 Tice Blvd  
Suite 230  
Woodcliff Lake, NJ 07677

VW Credit  
1401 Franklin Blvd  
Libertyville, IL 60048

WASCO Auto Supply  
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South Hackensack, NJ 07606

Wheel Fix It  
55 St. Mary's Place  
Freeport, NY 11520

Wurth USA  
PO Box 415889  
Boston, MA 02241-5889

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Internal Revenue Service  
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Philadelphia, PA 19101

Internal Revenue Service  
District Director's Office  
Newark District Office  
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<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>	
Caption in Compliance with D.N.J. LBR 9004-2(c) <b>WASSERMAN, JURISTA &amp; STOLZ, P.C.</b> <b>110 Allen Road, Suite 304</b> <b>Basking Ridge, NJ 07920</b> <b>Phone: (973) 467-2700</b> <b>Fax: (973) 467-8126</b> <b>Counsel to Debtor-in-Possession</b> <b>DANIEL M. STOLZ, ESQ.</b> <b>LEONARD C. WALCZYK, ESQ.</b>	
In Re:	
ALTOMARE AUTO GROUP, LLC, d/b/a UNION VOLKSWAGEN,	
Debtor.	

Chapter 11

Case No. 16-22376 JKS

Honorable John K. Sherwood

Hearing Date: February 21, 2018, 10:00 a.m.

**APPLICATION IN SUPPORT OF DEBTOR'S MOTION  
FOR SIXTH EXTENSION OF EXCLUSIVITY PERIODS TO FILE AND  
OBTAIN CONFIRMATION OF PLAN OF REORGANIZATION**

**TO: HONORABLE JOHN K. SHERWOOD  
UNITED STATES BANKRUPTCY JUDGE**

ALTOMARE AUTO GROUP, LLC, d/b/a UNION VOLKSWAGEN (hereinafter "AAG" or "Debtor"), the Debtor-in-Possession in the above captioned Chapter 11 case (the "Case"), by and through its counsel, Wasserman, Jurista & Stolz, P.C., respectfully provides this Court with the following Application in Support of the Debtor's Motion for an Order extending the Debtor's fifth exclusive period for filing a Plan of Reorganization from February 21, 2018 through May 21, 2018, and extending the Debtors' exclusive period in which to obtain confirmation of a Plan of Reorganization from April 22, 2018 through July 22, 2018 (the "Motion"):

1. On June 27, 2016, Debtor AAG filed a voluntary petition for relief under Chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”).

2. The Debtor continues to manage and operate its business as a Debtor-in-Possession pursuant to §§ 1107 and 1108 of the Bankruptcy Code.

3. AAG owned and operated a Volkswagen Automobile Dealership, pursuant to *inter alia*, a Dealer Sales and Service Agreement with Volkswagen of America (“VOA”), (the “Franchise Agreement”). The Franchise Agreement authorizes AAG to sell new Volkswagen vehicles and perform authorized warranty and service work on Volkswagen automobiles.

4. AAG conducted its business at three (3) locations: 2155 U.S. Route 22 West, Union, New Jersey 07083 (the “New Car Showroom”); 2135 U.S. Route 22 West, Union New Jersey 07083 (the “Used Car Showroom”); and 1180 Springfield Road, Union, New Jersey 07083 (the “Service Facility”).

5. The New Car Showroom and Used Car Showroom were owned by Altomare 22 Union LLC. (“Altomare 22”). Anthony Altomare is the managing member of Altomare 22.

6. The Service Facility is owned by ConnectOne Bank, successor to Union Center National Bank and is leased to AAG.

7. This Court entered an order on September 8, 2016 [Docket No. 140] authorizing the sale of substantially all of the Debtors assets free and clear of liens, claims, encumbrances and interests, except as set forth in the Order.

8. Excluded from the sale are potential causes of action and general intangibles, including, but not limited to, the cause of action pending in Union County, as well as any funds which will be flowing to AAG as a result of a recent settlement between Volkswagen of America and its dealers.

9. Additional background history of the Debtors is set forth in the Certification of Anthony Altomare in Support of First Day Motions (Docket No. 19, filed on June 30, 2016).

**REQUESTED RELIEF**

10. Pursuant to 11 U.S.C. §1121, the Debtor is provided with an exclusive period in which to file a Plan of Reorganization for the first 120 days of a Chapter 11 case. The Debtor is provided an exclusive period in which to obtain Confirmation of a Plan of Reorganization during the first 180 days of a Chapter 11 case. 11 U.S.C. §1121(b)(c). The Court entered an Order on August 17, 2017 (docket entry No. 329) extending these exclusive periods to November 21, 2017 and January 22, 2018 respectively.

11. Pursuant to 11 U.S.C. §1121(d)(1), the Court is empowered to extend the 120 day exclusive period during which only the Debtor may file a Plan of Reorganization and the 180 day exclusive period of time during which only the Debtor may seek confirmation of a Plan. 11 U.S.C. §1121(d)(1).

12. In making a determination whether to extend the exclusivity period, the Courts have considered:

- (1) the size and complexity of the case,
- (2) the necessity of sufficient time to negotiate and prepare adequate information,
- (3) the existence of good faith progress,
- (4) whether the Debtor is paying its debts as they become due,
- (5) whether the Debtor has demonstrated reasonable prospects for filing a viable Plan,
- (6) whether the Debtor has made progress negotiating with creditors,
- (7) the length of time the case has been pending,
- (8) whether the Debtor is seeking an extension to pressure creditors, and

(9) whether or not unresolved contingencies exist.

In re Central Jersey Airport Services, LLC., 282 B.R. 176, 184 (Bankr. D. N.J. 2002); In re Dow Corning Corp., 208 B.R. 661 (Bankr. E.D. Mich. 1997); In re Adelphia Communications Corp., 352 B.R. 578 (Bankr. S.D.N.Y. 2006).

13. Courts generally agree that a mechanical application of the enumerated factors should not be the extent of the analysis, but that it should include an evaluation of a global view of the case. In re Adelphia Communications Corp., 352 B.R. 578, 582, 590 (Bankr. S.D.N.Y. 2006) (a practical call can override a mere toting up of the factors); In re Dow Corning Corp., 208 B.R. 661 (Bankr. E.D. Mich. 1997).

14. **Size and Complexity of Cases.** The Debtor has taken substantial steps to streamline its business, disposing of excess inventory, and processing a sale of substantially all of its assets. The Debtor has resolved contested secured claims and is in the process of pursuing litigation against third parties in an attempt to increase available assets for distribution to creditors. The Debtor has filed four omnibus claim objections resulting in a reduction of claims of record by over \$700,000.

15. **Necessity of Sufficient Time to Formulate a Plan.** The Debtor has spent the bulk of its time in Chapter 11 (i) negotiating cash collateral arrangements with the secured creditors, (2) negotiating and ultimately obtaining approval for a sale of substantially all of the assets in this estate, (3) engaging in the aforesaid litigation, and (4) objecting to claims. Unfortunately, there was insufficient time before the current exclusivity period expires to prepare, circulate and file a Plan of Reorganization and Disclosure Statement in this case. A mediation hearing is scheduled regarding the Volkswagen litigation which, hopefully, will provide more certainty as to what creditors may receive under a plan in this case. Therefore,

additional time is necessary for the Debtors to formulate a Plan of Reorganization, now that there is more certainty as to the prospects of, and timing for, distribution to creditors in this case.

16. **Good Faith Progress Towards Reorganization.** In the short period of time that the Debtor has been the subject of these Chapter 11 proceedings, the Debtor has accomplished a great deal. The Debtor has negotiated a sale of assets, and obtained an Order approving the sale of substantially all of its assets. The Debtor has resolved contested claims with the secured and other creditors which will be satisfied through the proceeds of sale derived from the sale of their assets. The Debtor has been actively and consistently engaged with creditors in an effort to keep an open line of communication as to the progress of this case.

17. **Post Petition Obligations.** The Debtor is current with Monthly Operating Reports and all other obligations which have accrued since the Chapter 11 filing, with the exception of accrued professional fees.

18. **Reasonable Prospects for Filing a Viable Plan.** This factor requires only that the Debtor show it is able to obtain confirmation of at least some viable Plan in a reasonable period of time. The Debtor submits that it is likely it will be in a position to file a Plan of Reorganization in the near future. The Debtor expects to circulate its proposed plan prior to filing, and ultimately secure the approval of any impaired creditors.

19. **Progress of Negotiations.** As set forth hereinabove, the Debtor has resolved disputes regarding secured and other claims in this case. The Debtor is confident that the unsecured creditors will vote in favor of confirmation of a Plan.

20. **Lapse Time of the Case.** The Chapter 11 Case is just over fifteen months old.

21. **Impact on Creditors.** The Debtor is not seeking an extension of the exclusive period to pressure creditors to submit to the Reorganization Plan. As set forth hereinabove, the Debtor contemplates a consensual Plan of Reorganization in this case, which will provide a meaningful distribution to creditors.

22. **Unresolved Contingencies.** Additional time is needed in order to advise creditors as to the proposed distribution of the portion of settlement proceeds anticipated to be received by the estate from settlement of the Volkswagen of America litigation. There needs to be a determination as to the allocation to each individual dealer such as the Debtor from the settlement proceeds derived from that litigation. Once that is learned, the Debtor will be able to inform creditors as to what portion of the settlement proceeds will be received by the estate, which will then be made available for distribution. As of this time, that information has not yet been made available to the Debtor.

### **CONCLUSION**

23. Based upon the foregoing facts and legal authority, the Debtor respectfully submits that sufficient cause exists for the fourth extension of the Debtor's exclusive period in which to propose and confirm a Plan of Reorganization in this case.

**WHEREFORE**, the Debtor respectfully requests the entry of the Order submitted herewith, *extending the Debtors' exclusive period for filing a Plan of Reorganization from February 21, 2018 through May 21, 2018, and extending the Debtors' exclusive period*

*in which to obtain confirmation of a Plan of Reorganization from April 22, 2018 through July 22, 2018*, together with such other and further relief as is just and equitable.

Respectfully submitted,

**WASSERMAN, JURISTA & STOLZ, P.C.**  
Counsel for Debtor-in-Possession,  
Altomare Auto Group, LLC d/b/a Union  
Volkswagen

Date: January 22, 2018

By: /s/ Leonard C. Walczyk.  
**LEONARD C. WALCZYK**



**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-2(c)  
**WASSERMAN, JURISTA & STOLZ, P.C.**  
**110 Allen Road, Suite 304**  
**Basking Ridge, NJ 07920**  
**Phone: (973) 467-2700**  
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**Counsel to Debtor-in-Possession**  
**DANIEL M. STOLZ, ESQ.**  
**LEONARD C. WALCZYK, ESQ.**

In Re:

ALTOMARE AUTO GROUP, LLC, d/b/a  
UNION VOLKSWAGEN,

Debtor.

Chapter 11

Case No. 16-22376 JKS

Honorable John K. Sherwood

Hearing Date: February 21, 2018, 10:00 am

**ORDER GRANTING SIXTH EXTENSION OF EXCLUSIVITY PERIOD TO FILE  
AND OBTAIN CONFIRMATION OF PLAN OF REORGANIZATION**

The relief set forth on the following page is hereby **ORDERED**.

(Page 2)

Debtor: Altomare Auto Group, LLC, d/b/a Union Volkswagen

Case Nos.: 16-22376 JKS

Caption of Order: Order Granting Sixth Extension of Exclusivity Periods to File and Obtain Confirmation of Plan of Reorganization

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**THIS MATTER**, having come before the Court upon a Motion of the Altomare Auto Group, LLC, d/b/a Union Volkswagen (hereinafter “AAG” or “Debtor”), and the Debtor-in-Possession in the above captioned Chapter 11 case (the “Case”), by and through its counsel, Wasserman, Jurista & Stolz, P.C., seeking a sixth extension of the exclusivity period in which to file and seek a confirmation of a Plan of Reorganization in this case, and the Court having reviewed the Debtor’s Application and any opposition thereto and finding good cause for the entry of the within Order,

**IT IS HEREBY ORDERED AS FOLLOWS:**

1. The Debtor’s exclusive period for filing a Plan of Reorganization, be and is hereby extended through and including May 21, 2018.
2. The Debtor’s exclusive period in which to obtain confirmation of a Plan of Reorganization, be and is hereby extended through and including July 22, 2018.
3. The entry of this Order is without prejudice to further requests for extension of said time periods by the Debtor.