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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:	Chapter: 11
471 Haworth Ave, LLC	Case No.: 17-12174
Debtor(s).	Hearing Date: 11/21/2017 @ 11:00 a.m.
	Judge: Hon. Stacey L. Meisel, U.S.B.J.

DEBTORS' MOTION TO EXTEND TIME TO FILE PLAN OF REORGANIZATION
PURSUANT TO 11 U.S.C. §1121(d)(1)

The Debtor-in-Possession, 471 Haworth Ave., LLC (hereinafter "Debtor"), by and through its counsel, Gillman & Gillman, LLC, hereby moves for the entry of an Order Extending Time to File a Plan of Reorganization Pursuant to 11 U.S.C. § 1121(d)(1) and, in support thereof, Debtor respectfully states as follows:

1. On February 3, 2017 (the "Petition Date"), Debtor filed a Petition for relief under Chapter 11, Title 11 of the United States Code (the "Bankruptcy Code"). The Debtor is a single-asset real estate LLC in the Chapter 11 case within the meaning of Bankruptcy Code.

2. Debtor is operating and managing its property and assets as Debtor-in-possession pursuant to 11 U.S.C. §1107(a) and 1108.

3. No trustee or examiner has been appointed in Debtor's case. No Creditors' Committee has been formed.

4. Debtor owns the Property at 471 Haworth Ave., Haworth, NJ 07641 (“Property”).
5. The Debtor’s exclusive right to file a Plan pursuant to 11 U.S.C. §1121(b) was originally due to expire on August 2, 2017.
6. On August 2, 2017, the Debtor filed a Motion to Extend the Debtor’s exclusive right to file a Plan pursuant to 11 U.S.C. §1121(b) (See Docket Entry No. 31).
7. On August 29, 2017, the Court entered an Order Extending the “exclusivity period” to November 1, 2017. (See Docket Entry No. 34).
8. Pursuant to 11 U.S.C. §§ 1121 (d) (1) and (2) (A) and (B), the Debtor respectfully requests that the Court extend the time for the Debtor to file a Plan through November 30, 2017.
9. The Debtor is a “small business” within the meaning of the Code and therefore, pursuant to §1121(e)(2) is due to file a Plan no later than November 30, 2017.
10. The Debtor has listed the Property for sale at a list price exceeding the liens on the Property with an appointed realtor.
11. The Debtor anticipates that the Debtor will obtain a Contract for Sale of the Property in the near future and that the sale will resolve all outstanding obligations.
12. The Debtor is current in the filing of all Monthly Operating Reports and payment of any quarterly fees or will become current in the immediate future.
13. Debtor submits that it is more likely than not that Debtor’s Small Business Plan, as may be modified, will be confirmed within a reasonable period of time.
14. Debtor, therefore, seeks the entry of an Order Extending Time to Confirm Debtor’s Plan.

WHEREFORE, Debtor, 471 Haworth Ave., LLC, respectfully request the entry of the proposed form of Order submitted with this Motion extending the exclusive right to file a Plan pursuant to 11 U.S.C. §1121(b) until November 30, 2017, and for any additional and further relief as may be deemed appropriate.

Dated: October 27, 2017

GILLMAN & GILLMAN, LLC

/s/ Justin M. Gillman

Justin M. Gillman, Esq.
Attorney for Debtor